



ANNUAL REPORT 2024

2024



Traian Halalai Executive President



Continuous development, flexibility, adaptability, partnership and collaboration, professionalism, and responsibility remained the values that guided us throughout 2024—both in our relationships with partners and clients, and within our internal team. These are the principles that underpinned the remarkable results achieved in another successful year for Exim Banca Românească.

Over the past year, we maintained solid financial performance, built on efficiency, profitability, and customer experience optimization—further validating the soundness of the principles we applied in our strategic thinking.

We remained pragmatic and optimistic, turning each challenge into an opportunity. Our swift adaptability and effective responses to customer needs were reflected in the growth of consumer loan volumes and deposits, strengthening our competitive market position. We continued to gain recognition following our rebranding process, and the trust of our clients in the quality and appeal of our products enabled us to retain a leading position in the Romanian banking market.

What else did we accomplish in 2024? We remained committed to supporting the business environment—both SMEs and large corporations—through modern services and customized solutions, as well as through active participation in government programs and strategic partnerships, facilitating access to advantageous financing for our clients' projects. We continued to digitalize our services and modernize our IT infrastructure to provide clients with fast and secure solutions, while the steps taken toward sustainability align us with the new ESG requirements.

All these achievements reflect the commitment of the Exim Banca Românească team to support the development of our clients and the Romanian economy, maintaining high standards of professionalism, innovation, and responsibility.

We look to the future with the goal of becoming the preferred financial partner of our clients, continuing to invest in digital transformation to ensure a modern banking model centered on the client and their needs—ready to meet the challenges of the banking market. Our aim is to deliver comprehensive banking experiences and continue supporting the development of the banking system and Romania's economy, following the growth trend of recent years.

Romania is growing with us!

2024

2024

BOARD OF DIRECTORS' REPORT

FOR THE FINANCIAL YEAR
ENDED DECEMBER 31, 2024

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2024

GENERAL
PRESENTATION

1. GENERAL PRESENTATION

1.1 Exim Banca Românească

Exim Banca Românească S.A. is a legal entity governed by private law, a joint-stock company in which the Romanian State, through the Ministry of Finance, holds the majority shareholding. Exim Banca Românească operates in accordance with Law no. 96/2000, republished, with subsequent amendments and completions, with the provisions of banking legislation, Law no. 31/1990 on companies, republished, as well as with its own Articles of Association. Exim Banca Românească is a significant credit institution classified as another systemically important institution (O-SII).

The Bank was established in 1992 as a specialized institution whose main objective was to ensure financing for export or import operations, foreign investments, and other specific banking activities. Market segmentation and identification of the needs of new potential clients gradually led to a revision of the Bank's object of activity, through a legislative initiative that significantly broadened the scope of its offering. As a result of the extension of its activity, the Bank intensified its efforts to support and promote Romanian business, financing projects related to international trade, infrastructure development, public utility development, regional development, research and development activities, and environmental protection.

In January 2020, EximBank completed the acquisition of Banca Românească and initiated its integration, entering the retail banking market. The merger by absorption with Banca Românească, completed on 31 December 2022, marked the transformation of EximBank into a universal bank, followed in 2023 by a comprehensive rebranding process under the new name Exim Banca Românească.

In addition to its universal banking components, Exim Banca Românească is the only commercial bank in Romania that acts as the State's agent for financing, guarantees, and state-backed insurance, thereby supporting exports, international transactions, and other priority economic projects or EU fund absorption. Activities carried out on behalf and for the account of the State are functionally separate from commercial banking, with such operations approved by the Interministerial Committee for Financing, Guarantees, and Insurance—the only body authorized to establish eligibility criteria and the mechanisms for granting financial, guarantee, and insurance products offered by Exim Banca Românească in the name and on behalf of the State.

1.2 Structure of the Exim Banca Românească Group

As of 31 December 2024, the Exim Group consists of the parent company, Exim Banca Românească, and its subsidiary, the Insurance – Reinsurance Company Exim România.

The Insurance – Reinsurance Company Exim România (EximAsig) was established in 2009 as a specialized entity for the insurance of financial, export, and domestic commercial risks. Authorized in August 2010 to conduct credit and guarantee insurance, the company expanded its operations by obtaining authorization to underwrite 8 additional classes of insurance, including fire and natural disasters, property damage, civil liability, accidents, goods in transit, and financial loss insurance. EximAsig is controlled by Exim Banca Românească, which held 98.57% of its share capital as of 31 December 2024 (31 December 2023: 98.57%).

1.3 Business Model

The fundamental objectives of Exim Banca Românească are to support the national economy and to increase the degree of financial intermediation. For its activity carried out as a universal commercial bank, including retail, Exim Banca Românească addresses the needs of both the individual and corporate customer segments.

The Bank aims to lend responsibly, to encourage saving and, in general, to support all its clients with appropriate financial advice and solutions, whether they are retail, corporate or public sector clients.

Exim Banca Românească holds assets of RON 26.7 billion at the end of 2024, ranking 8th among credit institutions based on net asset value.

The national branch network of Exim Banca Românească comprises 108 territorial units (82 retail Branches and 26 Business Centers). The geographic footprint of the branch network is balanced, with the bank being represented in all counties. This facilitates both the financing of local business projects and the raising of resources from the population in a diversified manner.

The 82 Branches mainly serve the retail business line, but also the corporate business line for operations related to saving, performing cash and non-cash transactions, and using current account packages (including Internet Banking).

The 26 Business Centers are primarily responsible for selling credit products to customers in the legal entity segment with a turnover exceeding RON 2 million.

Mission

The mission of Exim Banca Românească is to support the increase of prosperity in Romania, to build sustainable partnerships for the social welfare and economic performance of its clients by accelerating financial intermediation.

Vision

Exim Banca Românească has an appetite for innovation and development and, being a solid credit institution, aims to offer personalized financial solutions to clients, confirming its status as a preferred banking partner in Romania. Exim Banca Românească fully leverages the resources and position it holds on the banking market, focuses on stimulating the business potential of its clients, and contributes to the sustainable development of Romania's economy and to the strengthening of the Romanian banking system. Moreover, as the performance of any organization is closely linked to the degree of development of the community in which it operates and the social environment, Exim Banca Românească continues to be actively involved in projects that contribute to the development of an educated and healthy society, with respect for the environment and sustainable development, building together Romania's future.

Values

The organizational culture of Exim Banca Românească has been formed and gradually developed through interactions between team members, with strong shaping factors that differentiate it, such as: leadership style and thus the way decisions are made, the level of formality, organizational structure, policies and know-how. Thus, a set of six values has emerged to contribute to increased efficiency and coherence in actions, namely: Partnership and Collaboration, Team Spirit, Flexibility and Adaptability, Continuous Development, Respect and Integrity, Professionalism and Responsibility.

2024



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BANCA ROMÂNEASCĂ'S ACTIVITY IN 2024

2. BANCA ROMÂNEASCĂ'S ACTIVITY IN 2024

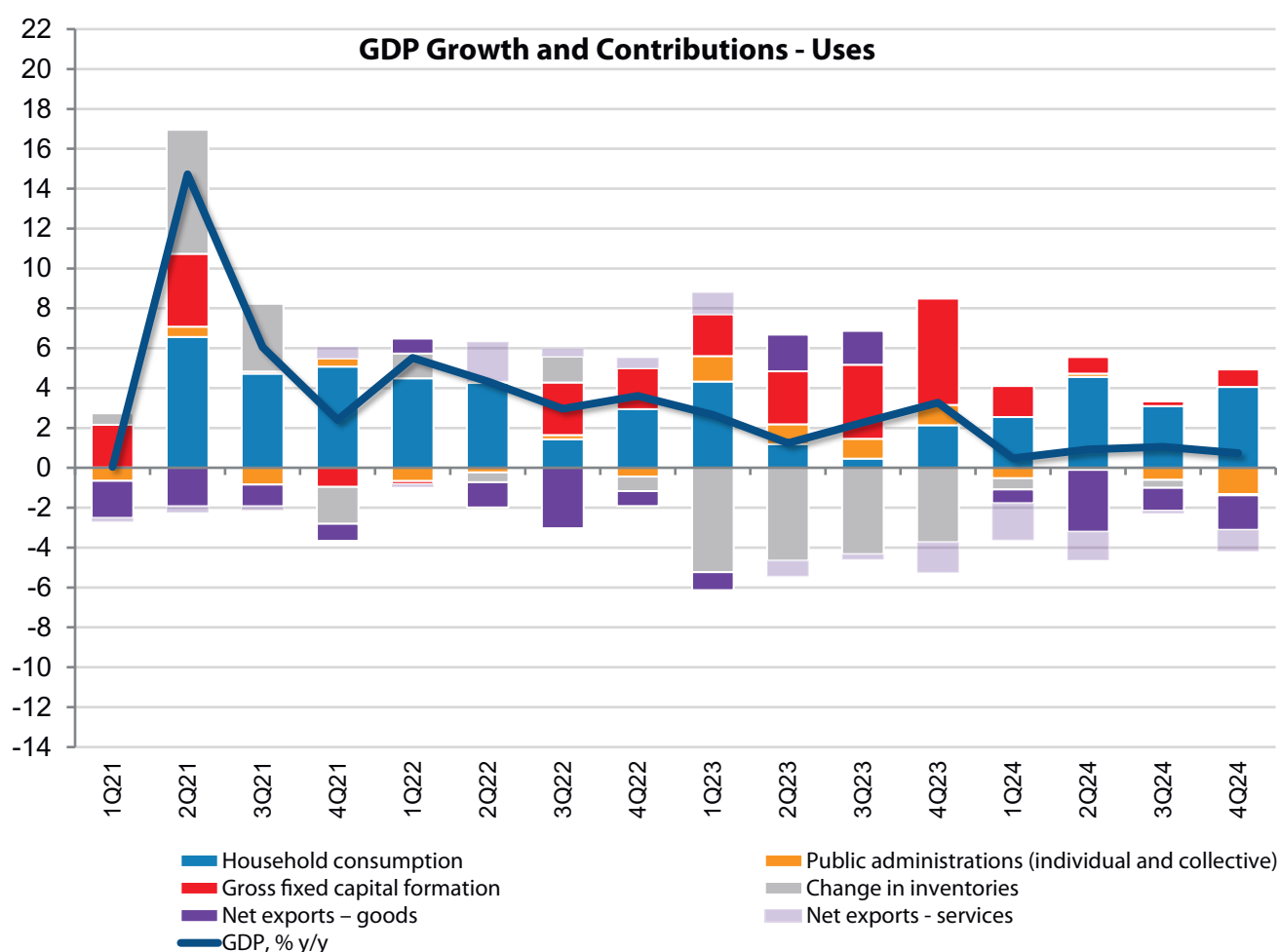
2.1 Macroeconomic and Banking Context

2.1.1 Macroeconomic Context

The performance of the Romanian economy took place in a complex geopolitical environment, marked by uncertainties regarding the continuation of the war in Ukraine, the conflicts in the Middle East, U.S.–China trade tensions, EU elections, as well as the economic developments in European countries that are Romania's main trading partners.

Domestically, economic growth remained at a moderate level in 2024, at 0.9%, with the GDP deflator standing 9.1% above the previous year's level.

On the demand side, private consumption was the main contributor. Stimulated by the increase in real disposable income of the population, falling inflation, improved consumer confidence, and easing of credit standards by banks, private consumption rose by 5.9%, contributing 3.6 percentage points to the real growth rate of gross domestic product. Gross fixed capital formation, after a strong increase in the first quarter, slowed in the following quarters, causing gross investments to register a negative dynamic of -1.7%. Given a limited domestic supply, demand was covered mainly by increased imports of goods and services (+3.4%), while exports of goods and services decreased by 3.6% amid weak external demand. Thus, net exports had a negative impact on the economy, significantly reducing economic growth by 2.9 percentage points.

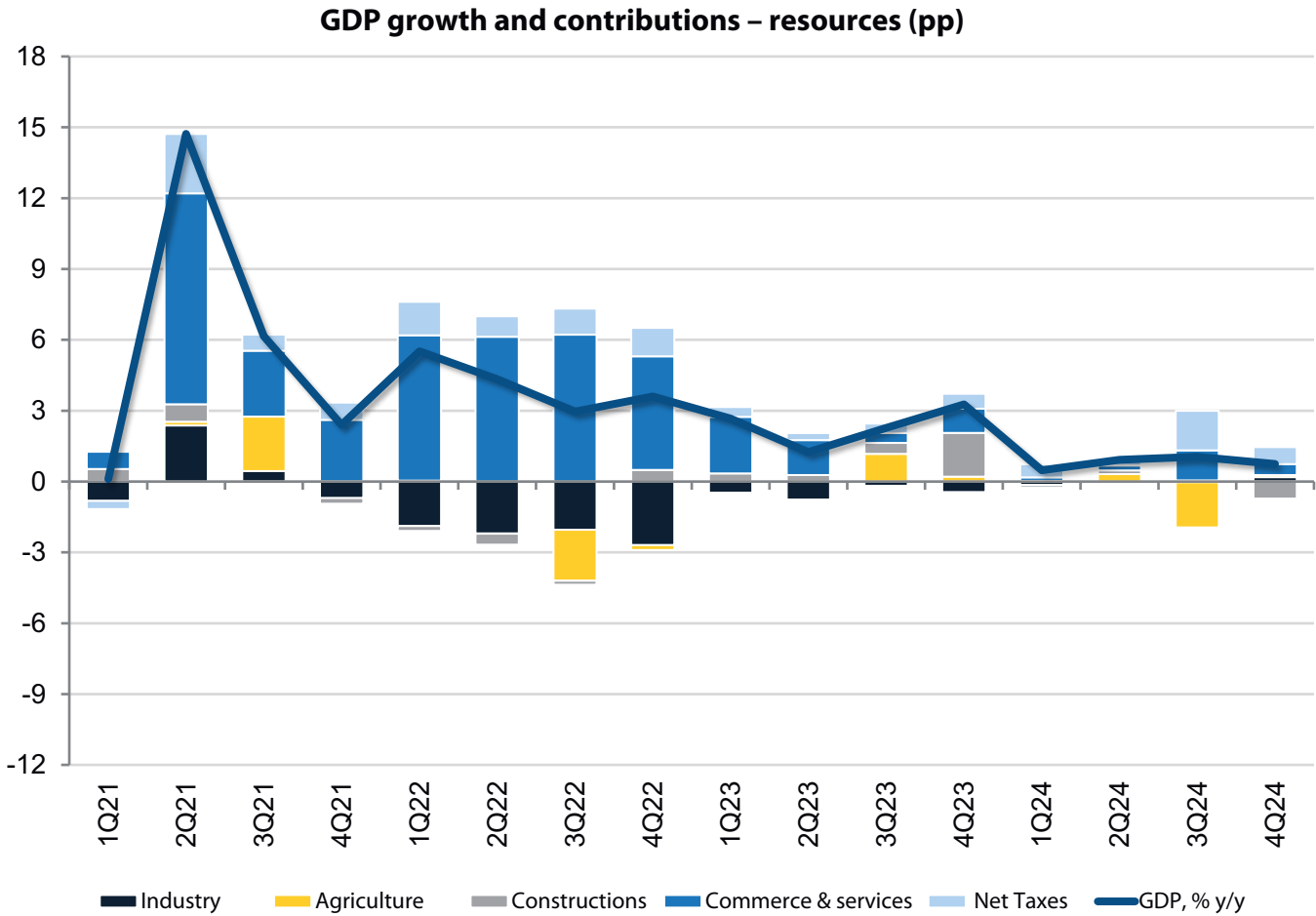


Source: INS, Exim Banca Românească

On the supply side, the modest dynamics of gross domestic product were driven by:

- the agricultural sector, with a decline in gross value added of 10.5%, affected in the summer by severe climatic conditions with unfavorable consequences on crop yields;

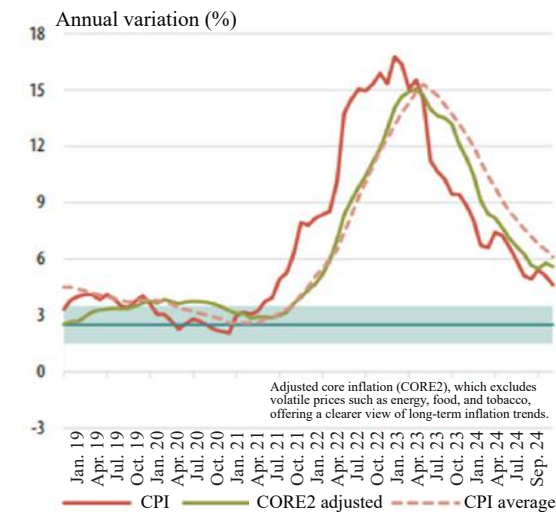
- the construction sector, which recorded a negative dynamic in gross value added compared to the previous year (-2.4%), caused by a contraction in activity in the first quarter.



Source: INS, Exim Banca Românească

In this context, the absorption of European funds becomes even more important, especially those from the National Recovery and Resilience Plan (NRRP), which could increase potential GDP by approximately 1% compared to the historical average economic growth.

Inflation and core inflation (CORE), %



Source of data: INS, NBR

The annual CPI inflation rate reached 5.1% at the end of 2024, a level 0.4 percentage points higher than three months earlier.

The downward trajectory was largely supported by exogenous components of the consumption basket, due to favorable statistical effects and benign developments in the oil market. However, factors such as severe drought and some temporary regional issues on the electricity market, along with a rapid wage dynamic that fuels cost-side pressures, have made the disinflation process slower. In this context, the adjustment of core inflation was modest, the indicator reaching 5.6% in December 2024.

Expressed as an annual average, in 2024 the inflation rate continued its downward trend: the value determined according to national methodology fell to 5.6%, while the indicator calculated based on the harmonized structure stood at 5.8%. However, Romania remains the EU member state with the highest average annual HICP rate.

As for the EUR/RON exchange rate, in 2024 the central bank's implicit preference was for a stable nominal exchange rate, while the draining of RON liquidity acted as an automatic stabilizer for the foreign exchange market when external pressures escalated. Uncertainties regarding fiscal policy and budgetary measures planned for 2025 generated a cautious atmosphere among investors, which could lead to a potential depreciation of the leu beyond the 5.06 threshold.

2.1.2 Banking Context

The Romanian banking market underwent major changes in 2024, marked by acquisitions that will lead to the disappearance of three major banks in 2025. Thus, First Bank will be integrated into the Intesa Sanpaolo Bank Group, Alpha Bank will become part of the UniCredit Group—which will thereby become the third-largest bank in Romania in terms of assets—and OTP Bank will be absorbed by the Banca Transilvania Group. These transformations will contribute to a consolidation of the banking market, resulting in a significant gap between the top seven banks and those ranked 8th to 10th, with a difference of at least 5 percentage points in market shares.

In 2024, the Romanian banking system continued to perform positively, with several significant indicators and trends reflecting its resilience and adaptability in the face of economic challenges.

The volume of liquid assets remained high, as a result of the substantial exposures of credit institutions to the central government (especially in government securities), and to the central bank (including due to the presence of excess liquidity). The trajectory of banks' direct exposures to the state was upward, with a 18.6% annual increase in balance, significantly above the annual growth rate of non-governmental sector lending.

Deposits attracted from the real sector account for 67.2% of total banking assets. The growth in deposits from individuals was more pronounced compared to those from companies, indicating a positive trend among Romanian households toward saving. This dynamic suggests increased financial stability among the population, in contrast with the challenges faced by the corporate sector.

The trend in non-governmental lending returned to growth, with household loans being the main driver, while loans to non-financial corporations recorded an almost full recovery in Q3 2024.

The estimated annualized profit of the banking system could reach approximately RON 15.4 billion by the end of 2024, with the return on equity (ROE) standing at 20.2%. There is a growing divergence in performance between large and medium-sized banks, with the difference between average ROE values increasing to 8.6 percentage points in June 2024.

In terms of efficiency, the cost-to-income ratio rose to 49.9% from 47.6% in December 2023, but remains within the low-risk threshold set by the EBA. It is worth noting that, under Law 290/2024, a supplementary tax on credit institutions has been applied starting in 2024. This tax is levied on turnover, set at 2% for the period from 1 January 2024 to 31 December 2025, and will decrease to 1% starting on 1 January 2026.

The non-performing loan (NPL) rate increased marginally from 2.4% in December 2023 to 2.5% in September 2024, indicating a good quality of assets.

2.2 Exim Banca Românească Results in 2024

Exim Banca Românească's overall performance was marked by a 23% increase in operating profit compared to the previous year. Consolidated post-tax profit rose to RON 86.4 million, nearly double the previous year's result; as a consequence, return on equity (ROE) reached 5.1%, reflecting a significant improvement year-over-year.

Key figures for Exim Banca Românească in 2024:

Net Profit

- Group: RON 86.4 million, up 89% compared to 2023
- Bank: RON 73.1 million, up 26% compared to 2023

Operating Income

- Group: RON 757.0 million, up 13%
- Bank: RON 739.9 million, up 17%

Operating Expenses

- Group: RON 434.0 million, up 7%
- Bank: RON 434.0 million, up 12%
- Cost-to-Income ratio: 57% compared to 61% in 2023. This improvement in efficiency occurred despite the introduction in 2024 of a turnover tax; excluding this additional cost, the Cost-to-Income ratio would have been 52%.

Total Assets

- Group: RON 26.782 million, up 1%
- Bank: RON 26.740 million, up 1%
- Exim Banca Românească maintains its 8th place in the Romanian banking system by asset size, with a market share of 3.0%

Gross Loan Portfolio

- RON 14.338 million, marginally down by 1%
- Of the total: RON 11.221 million in loans to legal entities and RON 3.118 million in loans to individuals (-7%)
- The Bank holds 4.0% of the market for loans to resident legal entities and 1.6% for loans to individuals

Customer Deposits

- Up 14% year-over-year to RON 20.075 million
- Of the total: RON 15.119 million from legal entities and RON 4.956 million from individuals

Operations on behalf and in the name of the Romanian State

- Exposures administered on behalf and in the name of the state increased by 3% compared to the previous year, reaching RON 10.358 million.

2.3 Activity on own behalf and account

In 2024, Exim Banca Românească continued its efforts to improve efficiency and profitability, ensuring healthy business development while focusing on optimizing customer experience through personalized services and modern financial solutions.

Regarding lending, the Bank aimed to stabilize its portfolio in 2024. Under these conditions, the gross loan balance decreased marginally (-1%).

Corporate lending. The gross loan balance granted to legal entities stood at 11.221 mil. lei as of 31 December 2024, at the same level as the previous year. The structure of legal entity clients by number of clients with exposure and internal segmentation is as follows: *large clients* 7%, *SME clients* 29%, *SBB clients* 21%, *microenterprises* 40% (targeted segment managed by the *Retail* line of business), *public authorities and financial institutions* 2%.

In 2024, Exim Banca Românească continued its participation in the SME support program within the IMM Invest Plus Program, a program run by the Romanian state through which state aid in the form of loan guarantees can be accessed. Through active involvement in this government program, the Bank offered entrepreneurs the opportunity to access financing to ensure liquidity for current operations or to support investments, under special credit conditions, in order to overcome current economic challenges. As of 31 December 2024, the total exposure of Exim Banca Românească from loans granted under the IMM INVEST / IMM INVEST PLUS / GARANT PLUS / PROD PLUS / INOVATION PLUS programs amounted to 2.5 billion lei, 17% of the Bank's total lending exposure.

Sustainable financing of investment projects through the partnership with EIB. In 2024, following a financing agreement concluded with the European Investment Bank (EIB), Exim Banca Românească provided SMEs and mid-cap companies with a ceiling of 50 mil. euros for financing investment projects under advantageous conditions. The agreement with the *EIB* allows the Bank to facilitate access to sustainable financing for SMEs, the central pillar of the economic growth agenda, through a new instrument that complements the existing range of products.

Exim Banca Românească continued to record remarkable results through factoring solutions adapted to clients' needs, consolidating its position in the specialized market. The total factoring volume reached 1.5 billion lei, up 9% compared to 2023, and the share of export factoring operations increased significantly, representing 69% of the annual total. At the same time, the number of invoices processed increased by 38%, demonstrating operational efficiency and growing demand for these services. The range of products offered included both domestic and international factoring facilities, with or without recourse, reverse factoring and collection. The Bank continued collaborating with top international factors for export factoring and used general and single buyer insurance policies to cover risks, assuming insolvency or prolonged non-payment risks of clients' partners.

The Bank remained among the top export factoring players in the Romanian banking market, oscillating between the first and second position based on export factoring volume. Additionally, Exim Banca Românească received international recognition by being awarded the prize for the highest growth in factoring services provided in 2023, by Factors Chain International (FCI), a global organization bringing together factoring companies and financial institutions worldwide. These results reflect the Bank's ongoing commitment to providing client-oriented solutions and supporting their development through innovative products and efficient services.

Trade finance and guarantee products remained an important component of the Bank's product offering for supporting legal entity clients in 2024. As of 31 December 2024, the Bank's portfolio included trade finance and guarantee exposures of over 2.820 mil. lei, an 8% increase compared to the previous year, in the context of a 32% growth in newly executed volumes.

The 2024 results for the retail business line reveal a positive trend in consumer lending, which increased by 19%, above the market growth rate (18%). Notably, non-mortgage consumer loans increased by 26% compared to the previous year, corresponding to a 67% increase in sales compared to 2023.

On the other hand, the Bank continued to strengthen its position in the mortgage lending segment, adapting to market dynamics and customer preferences. Although new sales increased by 53% compared to the previous year, in a context marked by a general decrease in interest rates and intensified banking competition, the Bank recorded a 17% reduction in the mortgage loan balance, while maintaining its commitment to offering competitive and sustainable products.

Exim Banca Românească further supported the programs run by the Romanian state through participation in the government credit programs StudentInvest and FamilyStart, with a guarantee ceiling for 2024 of 6.7 mil. lei for the FamilyStart program (fully utilized) and 35 mil. lei for the StudentInvest program (98% utilized).

In a **dynamic deposit market context**, Exim Banca Românească recorded solid performance, with a total deposit increase of 14%, above the market average of 11%. The corporate segment was the main growth driver, with an 18% increase—significantly higher than the market (11%)—while the household segment grew by 4%. These results reflect the Bank's strong competitive position in this segment, with the overall performance supporting the Bank's strategy to strengthen funding from non-bank customers.

In 2024, Exim Banca Românească made significant progress in **card operations and digital solution offerings**. The Bank gave special attention to continuing its digitalization strategy, expanding the Mobile Banking application to legal entities and adding new functionalities to *internet/mobile banking* applications, including: beneficiary information verification (via the SANB service offered by TransFond), real-time *push notification* for financial information, card display in the app, automatic card enrollment into Apple Pay digital wallets directly from the mobile app, and other customizations aimed at improving the user experience. As a result, compared to the end of 2023, the monthly average of Internet Banking transactions increased by 82%, and the number of clients with at least one Internet Banking transaction increased by 79%.

POS transaction acceptance services were significantly expanded, with total collections increasing by 55% compared to the previous year. The Bank became a principal POS acquirer member of the VISA and MASTERCARD card organizations, holding licenses for POS transaction acceptance (*EFTPOS & e-commerce*). The

Bank also joined the *POS Sharing* project, enabling the conclusion of agreements with major merchants participating in the project.

The Bank's ATM terminal fleet comprises 108 terminals, of which 76 are next-generation multifunctional terminals. The Bank initiated steps to renew the entire fleet. Under these conditions, the ATM terminal network recorded over 12% growth in cash deposits compared to 2023—an indicator which, in the current economic context, confirms both the upward trend in household savings and the growing use of bank cards or other electronic payment means, aligning the Bank's services with the market through the ATM/MFM terminal network.

Starting in 2024, Exim Banca Românească adjusted the discount mechanism for retail lending clients, shifting from discounts linked to transactional current account packages to those based on income inflows and transfers. This change aims to better address customer needs and align with current market practices. In parallel, the Bank also launched new card products, including Mastercard START, designed for children aged 6–14.

Another focus was on sustainability through the increased use of recycled materials in card production and the launch of a project to facilitate the issuance of digital cards.

To meet the needs of legal entity clients, in 2024, the Bank updated existing transactional packages, defined new packages with extended functionalities, and launched the Premium business card for legal entities.

Synergistic collaboration between retail and corporate segments was essential, as an integrated approach not only optimizes resources but also enhances the customer experience. In this respect, adjustments were made to the digital platform, a salary payment automation app was made available to clients, and the Bank introduced dedicated credit products for employees of companies with transactional current accounts at Exim Banca Românească. Furthermore, the Bank responded to customer needs through combined corporate–retail offers, successfully developing and maintaining stable partnerships that supported business consolidation. Accordingly, the Bank introduced credit products for employees of companies with transactional current accounts, resulting in the signing of 96 salary agreements and the sale of 5.168 account packages for corporate employees.

Process optimization, product development, synergies, and investments in digitalization contributed to the growth of the client portfolio for current accounts and Internet Banking. A total of 13.064 new packages were sold in 2024, and the current account balance of individual clients increased by 11%.

In the concluded financial year, the **Treasury business line** continued to play an essential role in ensuring financial stability and the necessary liquidity to support the Bank's operations. Efficient liquidity management was a priority, with mechanisms implemented to optimize placements and safely and profitably use the liquidity surplus.

Diversification of funding sources and strengthening the capital position materialized through the structuring of deposit offerings for individuals and legal entities, as well as the extension of bilateral financing contracts attracted from Romanian banking institutions under favorable conditions and the contracting of two subordinated loans.

At the same time, focus remained on maximizing revenue from treasury-specific activities through an active approach on financial markets and efficient foreign exchange risk management. As a result, in 2024, gains from foreign exchange and securities trading increased by 25%.

Operationally, a key development was the update of the treasury front-office application, aimed at aligning with new requirements and enhancing business capabilities. The financial performance of the Treasury business line was reflected both in the financial results and in compliance with regulatory prudential indicators, such as the liquidity coverage ratio (LCR), which stood at 244% at the end of 2024.

The Bank's high expertise in managing complex financial solutions enabled it to successfully coordinate or participate in syndicated loans, acting as mandated lead arranger, facility agent, or security agent, thereby strengthening relationships with strategic clients and ensuring efficient management of financial facilities throughout their term. Additionally, starting in 2024, Exim Banca Românească became one of the banks mandated by the Bank Deposit Guarantee Fund to make compensation payments to guaranteed depositors, further strengthening the partnership between the two entities.

The gradual implementation of taxonomy in products and processes represents a strategic development linked to sustainability. Thus, the Bank focused its efforts, in an initial phase, on identifying and classifying climate-eligible activities. As a next step, the Bank intends to use taxonomy alignment in product and process design as follows:

- Extending client interaction processes to improve data collection on eligibility and alignment with the Taxonomy,
- Enhancing technological capacity to capture relevant Taxonomy data and more easily identify eligible and aligned activities,
- Refining the product offering to include Taxonomy-related priorities, such as the development of products supporting Taxonomy-eligible/aligned activities,
- Improving data collection processes related to the energy efficiency of residential real estate,
- Redesigning ESG questionnaires addressed to clients to better identify Taxonomy eligibility and alignment elements.

In 2024, Exim Banca Românească made important steps toward modernization and digitalization, focusing on improving customer experience and streamlining internal processes. Notable achievements include the completion of a Unified Contact Center solution implementation—enabling diversified interaction through digital channels—and the expansion of Internet Banking and Mobile Banking platforms to also include legal entity clients.

Digital transformation remained a priority for the Bank, with new functionalities implemented in the Internet and Mobile Banking platforms, such as push notifications, optimized flows for deposit negotiations and foreign exchange transactions, as well as legal requirements imposed by European regulations. In addition, the CRM-BPM application was expanded by integrating new operational flows and document management features. In terms of IT infrastructure and data management, the Bank optimized the DataWarehouse solution, developed dynamic reports based on Microsoft Power BI technology, and strengthened IT infrastructure to ensure high availability and enhanced security. Moreover, the migration to Microsoft E5 licensing brought additional benefits regarding cybersecurity and compliance with legal regulations.

The year 2024 also marked the completion of important projects related to compliance (e.g., the KYC&AML application – AML module) and treasury, as well as the automation of essential financial reporting. At the same time, the Bank aligned itself with cybersecurity regulations (EBA GL/2019/04 and DORA), improving its internal regulatory framework and systemic controls.

In conclusion, 2024 was a year in which the Bank made significant progress in digitalization and modernization, successfully improving customer relationships and optimizing internal processes. These achievements reflect the Bank's continued commitment to innovation and operational efficiency.

Regarding the Group's insurance activity, according to the most recent available data, in the first nine months of 2024, the company EximAsig ranked third among insurance companies by gross written premiums for guarantee insurance, with a market share of 15.87%.

2.4 Activity in the Name and on Behalf of the State

Exim Banca Românească acted in line with its strategic mission to support the local economy and develop mechanisms enabling Romanian companies to sustain their businesses in a macroeconomic context marked by regional and global uncertainty. Thus, the total exposure in the name and on behalf of the state administered by Exim Banca Românească registered in 2024 an annual increase of 3%, reaching a historical maximum of 10.287 mil. lei, cumulating a growth rate of 155% compared to the balance at the end of 2020, based on products with a state aid component and those under market conditions.

Products with state aid

Within its mandate activity, Exim Banca Românească continued to manage the exposures committed as a result of implementing state aid schemes aimed either at combating the effects of the crisis caused by the COVID-19 pandemic or supporting the activities of Romanian companies in the context of Russia's aggression against Ukraine.

State aid was granted in the form of subsidized interest loans and guarantees associated with working capital or investment loans, valid until the end of 2023. Thus, at the end of 2024, the total cumulative value of the exposures administered by Exim Banca Românească related to products with state aid is 2.763 mil. lei, exposures in progress that will continue to be managed by Exim Banca Românească according to the specific internal regulations developed in application of the respective state aid schemes.

Standard products

Considering the bank's mission of active involvement in supporting and promoting the Romanian business environment, Exim Banca Românească holds a portfolio of products offered in the name and on behalf of the state under market conditions, consisting of:

- **NCS guarantees** issued in the name and on behalf of the Romanian state intended to guarantee up to 80% of the loans and guarantees granted by financial institutions in the following forms: guarantees, counter-guarantees, guarantee ceilings for SMEs, guarantee ceilings for investment projects with European funds. Under its mandate activity, the bank offers a standard guarantee product under which it guarantees, in the name and on behalf of the state, new financing granted by credit institutions for investment projects in new renewable energy capacities developed in Romania, from the perspective of production, transportation, and storage of energy from renewable sources (green guarantee).
- **NCS financing** – financing intended to support investment projects and/or current activities in priority areas: SME development, infrastructure development, public utility development, support for R&D activities, environmental protection, human resource training, regional development, international transactions.
- **Insurance** – Exim Banca Românească acts as Romania's export credit agency, with a portfolio of insurance policies that allow Romanian exporters of goods and services to grant extended payment terms to foreign buyers, and also allow Romanian investors to manage political risks related to foreign investments.

Additionally, considering the objectives determined by Romania's accession process to the Organisation for Economic Co-operation and Development (OECD), and the ESG requirements at the level of financial-banking institutions, Exim Banca Românească introduced a new export credit insurance product in the name and on behalf of the state, the Green Insurance, which was launched on the market in the first part of 2024. The new export insurance product covers supplier credits or buyer credits intended for medium- and long-term projects that contribute to reducing or adapting to climate change, consisting of sustainable energy production, projects aimed at replacing fossil fuels, energy efficiency, carbon capture, utilization and storage (CCUS), energy transport, distribution and storage, clean hydrogen and ammonia, low-emission production processes, low- and zero-emission transport, clean energy from minerals and ores.

The product approvals in the name and on behalf of the state on the standard segment during 2024 generated exposures at year-end of 7.524 mil. lei, up 38% compared to the previous year, through the support of transactions in the areas of infrastructure development, regional development, exports, and support for small and medium-sized enterprises, which offset the rapid decline of exposures with a state aid component that are in their repayment years.

Representation of the Romanian state's interests in the Three Seas Initiative Investment Fund (3SIIF)

The Three Seas Initiative Investment Fund (3SIIF) is a financial instrument through which the member states of the Three Seas Initiative (Romania, Poland, Czech Republic, Hungary, Slovakia, Slovenia, Latvia, Lithuania, Bulgaria, Croatia, Hungary) pool financial resources to contribute to the funding of regionally significant projects assumed at the highest level. 3SIIF was established in 2019 by the Polish development bank BGK and Exim Banca Românească, under the mandate to represent the interests of the Romanian state granted through GEO no. 82/2018 amending and supplementing Law no. 96/2000 republished.

Throughout 2024, Exim Banca Românească continued to actively participate in the activities of the Three Seas Initiative Investment Fund (3SIIF), supporting efforts to identify investment opportunities in Romania and assisting in the process of attracting local and international private investors into the shareholding structure of 3SIIF, alongside development finance institutions from the Three Seas Initiative countries.

Through GEO no. 126/2024, it was regulated that the activities carried out by Exim Banca Românească according to the provisions of Art. 2 letters m¹) and m²) of Law no. 96/2000, republished, will be taken over by the Investment and Development Bank and the Ministry of Finance, based on a handover protocol, within 90 days from October 25, 2024 (the date of entry into force of GEO no. 126/2024).

Following this change, in Q4 2024 Exim Banca Românească NCS initiated the preparatory steps to terminate the mandate for representing Romania in 3SIIF and to hand over the activity to the Investment and Development Bank, so that the transition of the activity does not affect the interests of the Romanian state as a shareholder in 3SIIF.

Through GEO no. 147/2024 for the amendment of certain legislative acts, Exim Banca Românească was authorized to ensure representation at the supervisory and decision-making bodies of the Three Seas Initiative Investment Fund and to carry out the legal and operational steps provided by the legislation applicable to the Three Seas Initiative Investment Fund until the representation of Romania at the Fund is taken over by the Investment and Development Bank.

Supporting the efforts to represent the interests of the Romanian state at the European Union (EU) and the Organisation for Economic Co-operation and Development (OECD)

According to the mandate provided by Law no. 96/2000, republished, with subsequent amendments and completions, Exim Banca Românească acts as Romania's *export credit agency* (ECA) and ensures participation in the meetings of the Export Credit Working Group under the Council of the European Union and of the OECD Export Credit Working Group.

Romania became a candidate country for integration into the Organisation for Economic Co-operation and Development (OECD) in January 2022, thus officially initiating the accession process to this organization. As part of this process, Exim Banca Românească, as Romania's *export credit agency* (ECA), was confirmed as the institution responsible for alignment with the specific regulations on export credits within the Trade Committee and the Anti-Corruption Committee. Thus, the bank has taken on an active role in implementing four OECD legal instruments in the field of export credits supported by the state, working in cooperation with the relevant ministries to express Romania's coordinated position in all discussion forums and to provide the inputs regarding export credits required in the national accession process to the OECD.

During 2024, Exim Banca Românească continued its bilateral dialogue with the Secretariat of the OECD Export Credit Working Group and with the other export credit agencies from OECD member states, ensuring alignment with OECD instrument amendments. The preliminary technical assessment of the OECD Export Credit Working Group Secretariat regarding Romania/Exim Banca Românească's activity as an *export credit agency* highlights that no priority recommendations have been identified that would block Romania's accession process to the OECD, and the technical report on the export credit agency activity of Exim Banca Românească is expected to be finalized in the first part of 2025.

2.5 Recognition and Awards Received in 2024

Exim Banca Românească received several awards throughout 2024 for its achievements, namely:

- “Asset Growth Award”, “Profit Growth Award” and “Deposit Growth Award” at the Top Bankers Gala, organized by Piața Financiară magazine.
- “Award for Supporting the Romanian Economy” at the Excellence in Business 2024 Gala, organized by the European Patronage of Business Women PEFA.
- “Financial Excellence and Social Responsibility Award” at the CHARITY FOR EDUCATION 2024 Gala, organized by Ziarul News.
- “DRIVING SUSTAINABLE FINANCIAL GROWTH in ROMANIA”, at The Diplomat 2024's Awards Gala.

- “Excellence in Financial Education Award” at the Gala Banking News.
- “Certificate of Excellence for supporting the country’s economic development through the campaign Romania grows with us!” at the “Romania is YOU” Gala.
- “Excellence Award – Romania after 35 years” at the 2024 Gala of the Piața Financiară magazine, awarded to companies that have contributed over a long period to the rise of the Romanian economy.
- “Award for contribution to the capitalization and international expansion of Romanian companies” at the Club Antreprenor Gala.

The Executive President of Exim Banca Românească, Traian Halalai, was named “Banker of the Year” at The Financial Leaders Awards 2024 Gala, for “creative leadership reflected in his essential contribution to the outstanding results achieved by the bank”.

2024

2024

FINANCIAL STATEMENTS OF
EXIM BANCA ROMÂNEASCĂ

3. FINANCIAL STATEMENTS OF EXIM BANCA ROMÂNEASCĂ

The financial statements of Exim Banca Românească were prepared in accordance with the International Financial Reporting Standards (IFRS) adopted by the European Union, applicable to credit institutions under NBR Order no. 27/2010 issued by the National Bank of Romania, as subsequently amended and supplemented.

The legal obligations regarding the proper and up-to-date organization and management of accounting, as well as the accounting principles (prudence, consistency of methods, going concern, accrual basis, intangibility of opening balance sheet, no offsetting, substance over form, and materiality threshold) were observed. The provisions of Accounting Law no. 82/1991, as amended and supplemented, as well as the accounting rules and methods provided by the applicable legislation, were observed. The annual consolidated and individual financial statements provide a true and fair view of the financial position and performance of Exim Banca Românească, as certified by the external auditor Deloitte Audit SRL.

3.1 Statement of Financial Position

Exim Banca Românească ended the year 2024 with total assets of 26.782 mil. RON, up 1% compared to the end of 2023.

The evolution of the main balance sheet items in mil. RON is as follows:

Financial position (mil. RON)	2024		2023		VARIATION %	
	Group	Bank	Group	Bank	Group	Bank
Cash, balances with NBR and commercial banks	8.036	8.022	7.379	7.368	+9%	+9%
Securities	4.372	4.314	4.583	4.540	-5%	-5%
Loans	13.852	13.852	13.998	13.998	-1%	-1%
Investments in subsidiaries	0	61	0	61		
Tangible, intangible assets and investment property	327	321	328	325	-0%	-1%
Other assets	196	170	230	157	-15%	+8%
Total Assets	26.782	26.740	26.518	26.448	+1%	+1%
Deposits from banks	1.252	1.252	1.155	1.155	+8%	+8%
Deposits from the state	2.800	2.800	5.474	5.474	-49%	-49%
Customer deposits	20.075	20.151	17.645	17.717	+14%	+14%
Subordinated loans	412	412				
Other liabilities	518	416	607	468	-15%	-11%
Shareholders' equity	1.725	1.709	1.637	1.634	+5%	+5%
Liabilities and equity	26.782	26.740	26.518	26.448	+1%	+1%

Loans to customers

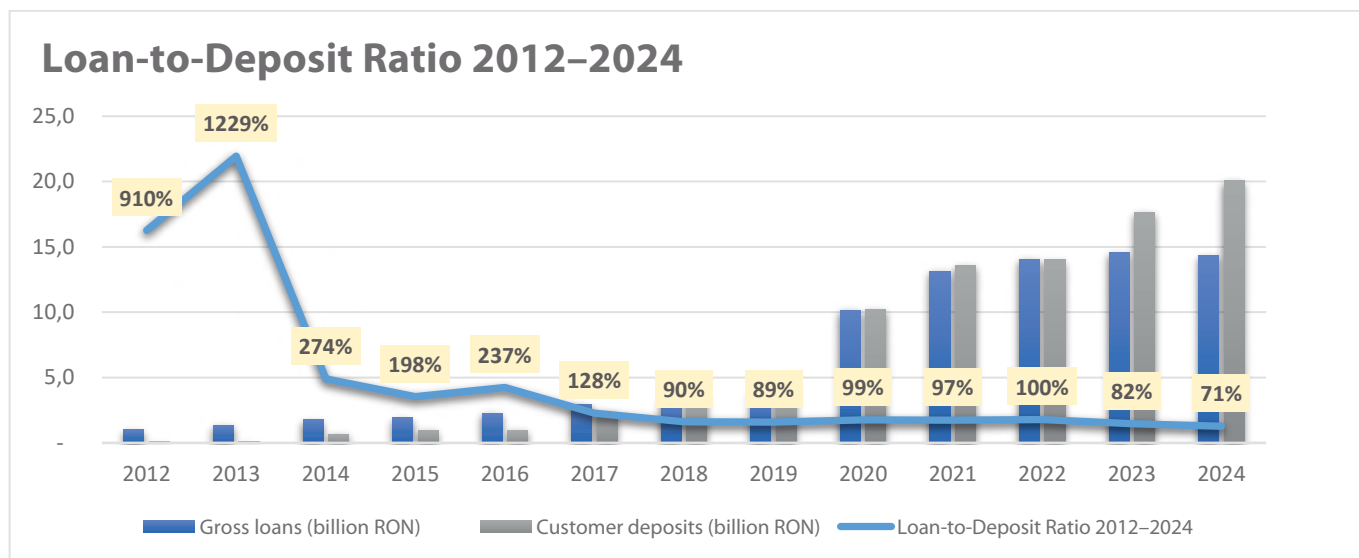
- Gross loan balance: marginally lower (-1%) than at the end of 2023;
- By business line, the gross loan balance to legal entities remained constant compared to the previous year, while loans to individuals recorded a 7% adjustment, as the 26% year-on-year growth in unsecured consumer loans did not offset the refinancing in the mortgage loan segment, in the context of increased external refinancing;
- The ratio of non-performing exposures (EBA AQT_3.2) was 3.3% as of December 2024.

Customer funding

- Customer deposits increased by 14% compared to 2023;
- Of the total, deposits from legal entities increased by 19% during the year, while deposits from individuals saw a marginal increase of +1%;
- 25% of deposits are from individuals and 75% from legal entities, with the share of legal entities increasing from the previous year.

Gross loans/deposits ratio:

- Loans/deposits ratio: 71%;
- Gross loans: 14.338 mil. RON;
- Customer balances: 20.075 mil. RON.



Securities

- The securities portfolio decreased by 5%, reaching 4.372 mil. RON on a consolidated basis;
- The main share of this category is represented by securities issued by the Ministry of Finance, amounting to 4.255 mil. RON.

Cash, balances with NBR and commercial banks

- Cash and balances with the Central Bank amounted to 8.036 mil. RON at group level, +9% compared to 2023;
- Immediate liquidity was 49% at the end of 2024, an improved level from the previous year and significantly above the limit set by the significant risk management strategy.

Tangible, intangible assets and investment property

- Remain at the previous year's level: 327 mil. RON;
- A significant share is held by right-of-use assets, which as at 31 December 2024 amounted to 141 mil. RON on a consolidated basis.

Placements from the Romanian State

- Attracted in accordance with Law 96/2000 to ensure the financial resources required to carry out operations in the name and on behalf of the state;
- Consist of: long-term deposits 1.400 mil. RON, 3-month deposits 981 mil. RON, sight deposits 397 mil. RON.

Shareholders' equity

As at 31.12.2024, consolidated shareholders' equity amounted to 1.725 mil. RON, of which:

- Share capital of +1.515 mil. RON, of which the statutory value registered with the Trade Register is 773 mil. RON corresponding to 128.751.992 shares with a nominal value of 6 RON/share, the difference representing inflation adjustment in accordance with IAS 29;
- Retained earnings: -395 mil. RON;
- Reserves: +574 mil. RON;
- Revaluation reserves of tangible/intangible assets, net of deferred tax: +41 mil. RON;
- Reserves from changes in fair value of financial assets measured at fair value through other comprehensive income, net of deferred tax: -11 mil. RON.

3.2 Statement of Profit or Loss

The consolidated net result of Exim Banca Românească as at 31 December 2024 is 86.4 mil. RON, of which the Bank's profit is 73.1 mil. RON.

The dynamics of the financial results of the Bank and the Group are presented below (mil. RON):

Statement of profit or loss (mil. RON)	2024		2023		VARIATION %	
	Group	Bank	Group	Bank	Group	Bank
Operating income	757.0	739.9	668.8	633.4	+13%	+17%
Net interest income	509.5	504.3	405.4	399.5	+26%	+26%
Net fee and commission income	119.3	119.2	103.0	102.9	+16%	+16%
Net trading income and net income from financial assets at fair value through profit or loss	104.1	104.2	120.1	120.1	-13%	-13%
Net insurance income	11.7	0.0	29.7	0.0	-61%	
Other income	12.2	12.2	10.6	11.1	+15%	+11%
Operating expenses	-434.0	-434.0	-405.5	-388.0	+7%	+12%
Operating result	322.9	305.9	263.3	245.4	+23%	+25%
Risk cost	-212.2	-211.8	-206.3	-205.7	+3%	+3%
Income from reversal of impairment on investments in subsidiaries	0.0	0.0	0.0	27.0		
Gross profit	110.8	94.1	57.0	66.7	+94%	+41%
Current and deferred income tax	-24.3	-21.0	-11.1	-8.4	+118%	+149%
Net profit	86.4	73.1	45.8	58.2	+89%	+26%

Operating income

- 757.0 mil. RON, up 13% compared to the previous year, driven by increased business volumes, of which:
 - Net interest income: 509.5 mil. RON in 2024, up 26% compared to the previous year, at Group level, due to volume growth and improved funding cost;
 - Net fee and commission income: increased by 16%, reaching 119.3 mil. RON, mainly due to lending commissions and commissions from managing operations in the name and on behalf of the state;
 - Net trading income and income from financial assets at fair value through other comprehensive income: amounted to 104.1 mil. RON, down 13% due to lower foreign exchange SWAP gains as a result of narrowing interest rate differentials;
 - Net insurance income: 11.7 mil. RON recorded at Group level.

Operating expenses

- Reached 434.0 mil. RON, up 7% from the previous year due to the introduction of turnover tax (38.0 mil. RON). Excluding this tax, operating expenses would have declined by 2%;
- Staff and related costs increased by 1%, depreciation expense increased by 5%, other operating expenses rose by 19% (decrease of 10% excluding the impact of the turnover tax).

Risk cost

- Net impairment expense on financial assets and guarantees granted: 212.2 mil. RON (including recoveries from off-balance-sheet loans), increased by 3% compared to the previous year, with the Group maintaining a prudent risk approach.

3.3 Prudential Indicators

The capital adequacy ratio as at 31.12.2024, calculated in accordance with Regulation 575/2013, indicates an adequate own funds ratio. The evolution of the main prudential indicators of the Group/Bank at year-end 2024 compared to the previous year is presented below:

Key indicators	2024		2023	
	<i>Group</i>	<i>Bank</i>	<i>Group</i>	<i>Bank</i>
PROFITABILITY				
Return on assets	0.3%	0.3%	0.2%	0.2%
Return on equity	5.1%	4.4%	2.9%	3.7%
Operating expenses to operating income	57%	59%	61%	61%
CAPITAL ADEQUACY				
Total capital ratio		24.2%		19.0%
Tier 1 capital ratio		19.6%		19.0%
Common equity Tier 1 ratio (CET 1)		19.6%		19.0%
Leverage ratio – transition definition		5.9%		5.7%
LIQUIDITY				
Immediate liquidity		49%		48%
Liquidity coverage ratio (LCR)		244%		320%
Net stable funding ratio (NSFR)		159%		159%
Gross loans to deposits		71%		82%
ASSET QUALITY				
Non-performing loan ratio (EBA AQT_3.2)		3.3%		3.3%

2024

The image features a minimalist design with the year '2024' in a bold, dark blue sans-serif font. The text is positioned in the lower half of the frame. Below the text, the background transitions into a series of overlapping triangles in various shades of blue, creating a dynamic, geometric pattern that fills the bottom portion of the image. The top half of the image is a solid, light blue color.

2024

CORPORATE GOVERNANCE

4. CORPORATE GOVERNANCE

4.1 Shareholding, Subsidiaries and Holdings

As at 31.12.2024, Exim Banca Românească has the following shareholding structure:

- The Romanian State through the Ministry of Finance, holding a 98.86% interest in the share capital;
- Individual and legal entity shareholders, other than the Romanian State, holding a 1.14% interest in the share capital.

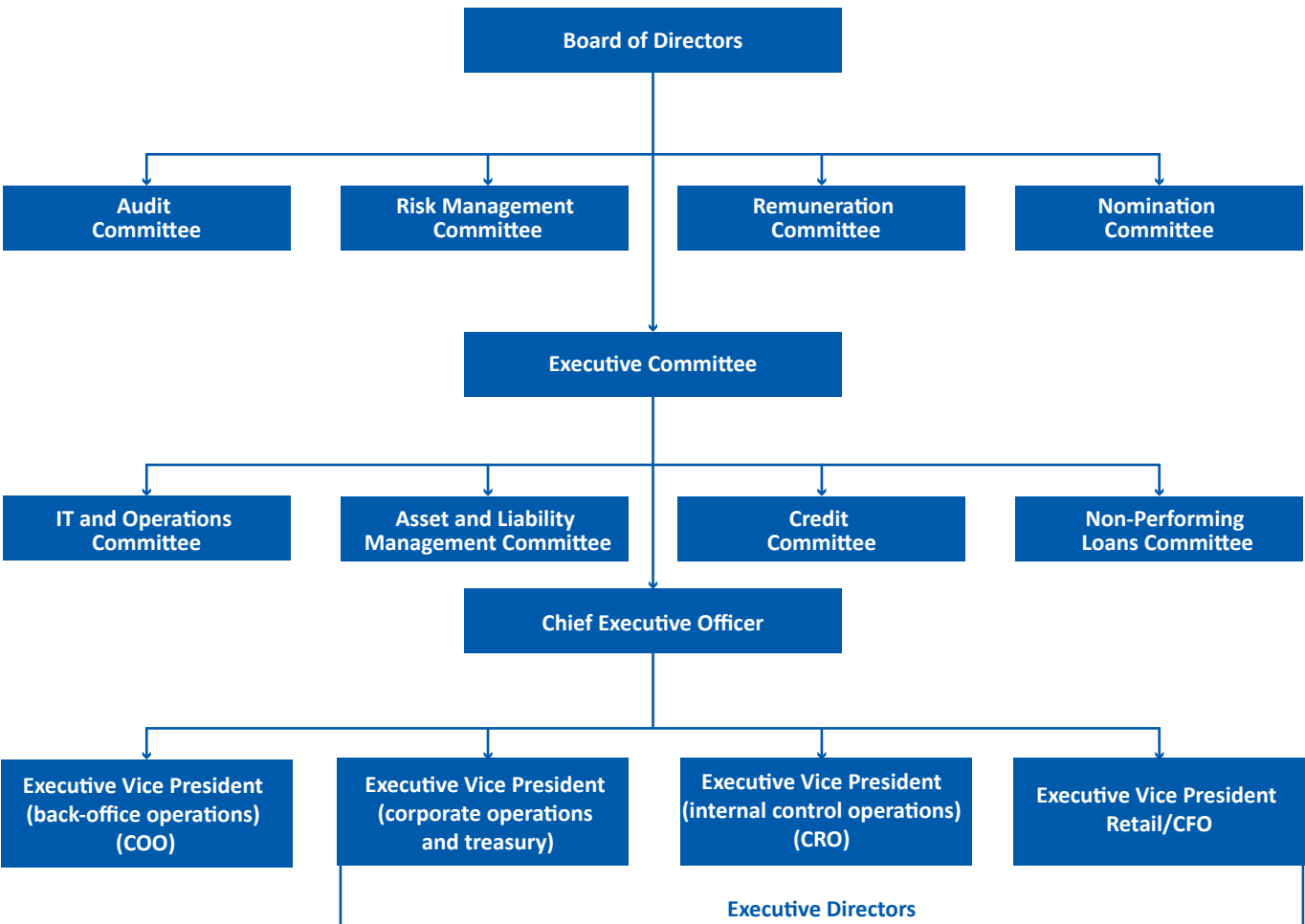
All shareholders of Exim Banca Românească are treated fairly and exercise their right to be equally and simultaneously informed and to control the Bank's activity, having access, based on the principle of decision-making transparency, to information published on the Bank's website, where they can find financial statements, annual reports, reports on transparency and disclosure requirements, information on the sustainability strategy, and can actively participate in the Bank's fundamental decisions and public policy objectives.

In preparing these reports and statements, the Bank adheres to high standards of transparency, accountability and integrity, being subject to accounting, disclosure, compliance and audit standards in accordance with international best practices. For active, fair and effective communication with all shareholders, respecting the general rule of equal and simultaneous disclosure of information, the Bank provides on its website the section "Information for shareholders", thereby communicating in real time information on the General Meetings of Shareholders, the resolutions adopted, indicating the associated communication channels, including a dedicated correspondence address: suport.acționari@eximbank.ro.

Subsidiaries

Within the financial consolidation perimeter, Exim Banca Românească includes the Insurance – Reinsurance Company Exim România, a Romanian legal entity authorised by the Financial Supervisory Authority, a company operating in the non-life insurance field, in which Exim Banca Românească holds a 98.570% ownership interest.

4.2 Management Structures at Exim Banca Românească



General Meeting of Shareholders

The General Meeting of Shareholders is the authority that ensures the Bank's strategic management, with the task of setting organisational strategic objectives and allocating the necessary resources for achieving them, including in terms of sustainability initiatives under the Exim Banca Românească Sustainability Strategy.

The General Meetings are ordinary and extraordinary.

The Ordinary General Meeting of Shareholders has the following responsibilities:

- a. appoints the executive and non-executive directors; determines their responsibilities and revokes them. The executive directors consist of the Chief Executive Officer and 3 Executive Vice Presidents of the Bank. It appoints the Chairperson of the Board of Directors from among the non-executive members;
- b. sets the remuneration for the executive and non-executive members of the Board of Directors;
- c. reviews, approves or amends the annual financial statements, based on the reports presented by the Board of Directors and the financial auditors, and determines the dividend;
- d. rules on the management of the Board of Directors;
- e. approves the revenue and expenditure budget and the activity programme;
- f. approves the development strategy and business plan;
- g. decides on the pledging, leasing or dissolution of one or more of the company's units;
- h. takes note of the Half-Yearly Report of the Board of Directors prepared in accordance with the provisions of Art. 55 para. (1) of GEO 109/2011 on corporate governance of public enterprises, as amended and supplemented.

Extraordinary General Meeting of Shareholders has the following responsibilities:

- a. decides on amendments to the Bank's Articles of Association and name;
- b. decides on the change of the Bank's registered office;
- c. decides on changes to the Bank's object of activity;
- d. decides on increases in share capital;
- e. decides on the reduction of share capital or its replenishment through the issuance of new shares;
- f. decides on bond issuance;
- g. decides on equity participation in financial and banking companies, in compliance with legal provisions;
- h. decides on the dissolution and liquidation of the Bank;
- i. decides on the acquisition, disposal, leasing, exchange, or pledging of assets from the Bank's patrimony whose value exceeds half the accounting value of the Bank's assets at the time of signing the legal document;
- j. approves mergers with other companies or the division of the company;
- k. decides on any other matters assigned to it by law in relation to the Bank's activities.

Board of Directors

Exim Banca Românească, a Romanian legal entity organized as a joint-stock company operating in accordance with the Companies Law no. 31/1990, republished, with subsequent amendments and additions, the Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy, approved by Law no. 227/2007, with subsequent amendments and additions, the subsequent banking regulations issued by the National Bank of Romania, the applicable European regulations with direct effect, as well as Law no. 96/2000 on the organization and operation of Exim Banca Românească, republished, with subsequent amendments and additions, and the Bank's Articles of Association, is a significant credit institution classified as an Other Systemically Important Institution (O-SII).

Exim Banca Românească is managed under a unitary system and is led by a Board of Directors appointed by the General Meeting of Shareholders, consisting of 9 members, of which 5 are non-executive directors and 4 are executive directors, respectively the Bank's Chief Executive Officer and 3 Executive Vice Presidents, in accordance with the provisions of Law no. 96/2000 on the organization and operation of Exim Banca Românească, republished, with subsequent amendments and additions, Government Decision no. 924/2023 regarding the selection procedure, remuneration of the Chief Executive Officer, Executive Vice Presidents, and non-executive directors of the Board of Directors of Exim Banca Românească S.A., and the Bank's Articles of Association. The Chairperson of the Board of Directors is appointed by the Ordinary General Meeting of Shareholders from among the non-executive members.

The Bank's directors are appointed by the General Meeting of Shareholders for a period of 4 years, with the possibility of renewing the mandate. Among the non-executive members of the Board, a sufficient number of members (at least 3) must be independent, in accordance with the applicable legal and regulatory provisions.

The exercise of the directors' responsibilities is subject to prior approval from the National Bank of Romania, and their administrative duties are carried out starting from the date of fulfilling this requirement.

The responsibilities of the Board members are in line with the mandate granted by the shareholders, with the ultimate responsibility being the Bank's performance. The Rules of Organization and Operation set out responsibilities such as: establishing, approving, and supervising the implementation of the overall business strategy and the key policies of the credit institution, considering the applicable legal and regulatory framework, financial interests, and the long-term solvency of the credit institution.

The Board of Directors establishes and approves the bank's sustainability strategy for a horizon of at least 3 years, setting objectives in the three areas of Environment, Social, and Governance, in close correlation with the business strategy.

The Board of Directors also approves the business model of Exim Banca Românească, pursuing the implementation of a sustainable business model with durable objectives related both to the development of the organization itself according to high standards of integrity and to supporting the investment projects of its clients, actively supervising risk management systems.

The composition of the Board of Directors during 2024 was as follows:

1. Andrei Răzvan MICU – Non-executive member, Chairman of the Board of Directors
2. Traian Sorin HALALAI – Executive member of the Board of Directors, Chief Executive Officer
3. Cristian Florin ȘAITARIU – Executive member of the Board of Directors, Executive Vice President
4. Nina PUIU – Independent non-executive member
5. Cristi Marcel SPULBĂR – Independent non-executive member

With the following clarifications:

- During the period **01.01.2024 – 25.11.2024**, the Board of Directors was composed of 2 executive directors and 3 non-executive directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **25.11.2024 – 06.12.2024** - the Board of Directors was composed of 2 executive directors and 3 non-executive directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **06.12.2024 – 31.12.2024** - the Board of Directors was composed of 1 executive director and 3 non-executive directors holding 4-year mandates (to end on 24.11.2028), and one executive director with an interim mandate (namely Cristian Florin ȘAITARIU), with full capacity to exercise responsibilities.

During 2024, the Board of Directors met 33 times, each director fulfilling the commitment regarding the minimum expected time of effective participation necessary to adequately exercise the prerogatives of the position as a member of the Board of Directors.

Supporting committees of the Board of Directors

➤ ***Audit Committee***

The composition of the Audit Committee during 2024 was as follows:

1. Nina PUIU – Chair, independent non-executive director
2. Cristi-Marcel SPULBĂR – Member, independent non-executive director
3. Andrei-Răzvan MICU – Member, non-executive director

With the following clarifications:

- During the period **01.01.2024 – 25.11.2024**, the Audit Committee was composed of non-executive directors of the Board of Directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **25.11.2024 – 06.12.2024**, the Audit Committee was composed of non-executive directors of the Board of Directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **06.12.2024 – 31.12.2024**, the Audit Committee was composed of non-executive directors of the Board of Directors holding 4-year mandates, to end on 24.11.2028.

During 2024, the Audit Committee met 19 times, each non-executive member fulfilling the commitment regarding the minimum expected time of effective participation required to adequately exercise the prerogatives in the meetings of the supporting committees of the management body in its supervisory role, namely 100% of all meetings.

➤ ***Risk Management Committee***

The composition of the Risk Management Committee during 2024 was as follows:

1. Cristi-Marcel SPULBĂR – Chair, independent non-executive director
2. Nina PUIU – Member, independent non-executive director
3. Andrei-Răzvan MICU – Member, non-executive director

With the following clarifications:

- During the period **01.01.2024 – 25.11.2024**, the Risk Management Committee was composed of non-executive directors of the Board of Directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **25.11.2024 – 06.12.2024**, the Risk Management Committee was composed of non-executive directors of the Board of Directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **06.12.2024 – 31.12.2024**, the Risk Management Committee was composed of non-executive directors of the Board of Directors holding 4-year mandates, to end on 24.11.2028.

During 2024, the Risk Management Committee met 11 times, each non-executive member fulfilling the commitment regarding the minimum expected time of effective participation required to adequately exercise the prerogatives in the meetings of the supporting committees of the management body in its supervisory role, namely 100% of all meetings.

➤ ***Remuneration Committee***

The composition of the Remuneration Committee during 2024 was as follows:

1. Nina PUIU – Chair, independent non-executive director
2. Cristi-Marcel SPULBĂR – Member, independent non-executive director
3. Andrei-Răzvan MICU – Member, non-executive director

With the following clarifications:

- During the period **01.01.2024 – 25.11.2024**, the Remuneration Committee was composed of non-executive directors of the Board of Directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **25.11.2024 – 06.12.2024**, the Remuneration Committee was composed of non-executive directors of the Board of Directors holding interim mandates, with full capacity to exercise responsibilities;
- During the period **06.12.2024 – 31.12.2024**, the Remuneration Committee was composed of non-executive directors of the Board of Directors holding 4-year mandates, to end on 24.11.2028.

During 2024, the Remuneration Committee met 8 times, each non-executive member fulfilling the commitment regarding the minimum expected time of effective participation required to adequately exercise the prerogatives in the meetings of the supporting committees of the management body in its supervisory role, namely 100% of all meetings.

➤ *Nomination Committee*

The composition of the Nomination Committee during 2024 was as follows:

1. Nina PUIU – Chair, independent non-executive director
2. Cristi-Marcel SPULBĂR – Member, independent non-executive director
3. Andrei-Răzvan MICU – Member, non-executive director

With the following clarifications:

- During the period **01.01.2024 – 25.11.2024**, the Nomination Committee was composed of non-executive directors of the Board of Directors, holding interim mandates, with full capacity to exercise responsibilities;
- During the period **25.11.2024 – 06.12.2024**, the Nomination Committee was composed of non-executive directors of the Board of Directors, holding interim mandates, with full capacity to exercise responsibilities;
- During the period **06.12.2024 – 31.12.2024**, the Nomination Committee was composed of non-executive directors of the Board of Directors, holding 4-year mandates, to end on 24.11.2028.

In 2024, the Nomination Committee met 8 times, with each non-executive member fulfilling the commitment regarding the minimum expected time of effective participation required to adequately perform the prerogatives in the meetings of the supporting committees of the management body in its supervisory role, namely 100% of total meetings.

Executive Committee

The Executive Committee ensures the day-to-day senior management of Exim Banca Românească based on delegation from the Board of Directors and under its supervision.

In accordance with the Statute of Exim Banca Românească, the Executive Committee consists of the Chief Executive Officer and up to 4 Executive Vice Presidents. The prerogatives of the bank's executives are subject to prior approval by the National Bank of Romania, with responsibilities exercised from the date this condition is fulfilled.

The Executive Committee is responsible for implementing the applicable strategies and policies of the bank and for maintaining a rigorously designed management framework in accordance with applicable legislation and banking regulations.

The composition of the Executive Committee during 2024 was as follows:

1. Traian Sorin HALALAI – Chief Executive Officer of Exim Banca Românească, temporary coordinator of internal control and back-office activities
2. Cristian Florin ȘAITARIU – Executive Vice President, coordinator of corporate and treasury activity and temporarily of retail activity

With the following clarifications:

- During the period **01.01.2024 – 25.11.2024**, the Executive Committee was composed of 2 members, namely 1 Chief Executive Officer and 1 Executive Vice President, holding interim mandates, with full capacity to exercise responsibilities;
- During the period **25.11.2024 – 06.12.2024**, the Executive Committee was composed of 2 members, namely 1 Chief Executive Officer and 1 Executive Vice President, holding interim mandates, with full capacity to exercise responsibilities;
- During the period **06.12.2024 – 31.12.2024**, the Executive Committee was composed of 2 members, namely 1 Chief Executive Officer holding a 4-year mandate (ending on 24.11.2028), and 1 Executive Vice President holding an interim mandate, both with full capacity to exercise responsibilities.

In 2024, the Executive Committee met 60 times, with each member fulfilling the commitment regarding the minimum expected time of effective participation required to adequately exercise the prerogatives of their position in Executive Committee meetings.

Specialized Committees of the Executive Committee:

➤ Credit Committee (CCr)

The Credit Committee evaluates the terms for granting loans and issuing guarantees in relation to the risks associated with operations for own-account activities for legal entity clients.

➤ Asset and Liability Management Committee (ALCO)

In accordance with its competencies, the Asset and Liability Management Committee (ALCO) is responsible for managing and making decisions regarding the bank's assets and liabilities to maintain competitiveness and profitability, as well as manage related risks, based on documentation prepared by internal specialist structures and trends in the macroeconomic and financial markets environment, also considering legislative changes impacting the bank's activity.

In this regard, ALCO's activity primarily involves prudent management of the bank's resources and placements, ensuring liquidity, managing currency positions, interest rates on assets and liabilities, transfer pricing, interest rate risk, currency risk, liquidity risk, and funding risk.

ALCO operates in line with the bank's strategies and policies in the field and ensures, through its activity, the maximization of returns on assets and other elements through efficient resource management.

ALCO also has specific responsibilities regarding the Recovery Plan, acting both as a Monitoring Committee and as a Recovery Committee (Extended ALCO).

➤ IT Committee (CIT)

The IT Committee mainly coordinates the portfolio of projects included in the annual Master Plan, evaluates necessary resources, prioritizes and balances projects with IT&C impact, monitors the implementation of IT&C projects, and the development and integration of IT solutions into the bank's business development processes.

➤ Non-Performing Loans Committee (CCN)

The Non-Performing Loans Committee ensures an adequate recovery process for the portfolio of problematic assets. It analyzes the portfolio of non-performing assets and related proposals, evaluates, endorses, or approves—within its competencies—the proposed measures for the recovery of the bank's receivables from non-performing loans and/or other commitments related to Exim Banca Românească's own-account operations. Additionally, the CCN closely monitors the restructuring and recovery process for problematic loans of managed clients.

4.3 Governance Policies

4.3.1 Policy regarding the Management Framework at Exim Banca Românească

Exim Banca Românească has a formally defined and rigorously designed management framework that includes a clear organizational structure with well-defined, transparent, and coherent lines of responsibility; effective processes for identifying, managing, monitoring, and reporting risks to which it is or may be exposed; adequate internal control mechanisms, including rigorous administrative and accounting procedures; and remuneration policies and practices that promote and are aligned with sound and effective risk management.

The processes and mechanisms related to the activities carried out are comprehensive and tailored to the nature, scale, and complexity of the risks inherent to the business model.

The principles are established through the internal regulatory framework in accordance with applicable laws, regulations, and procedures.

The control mechanisms are ensured by an internal control framework that includes the organization of the risk management, compliance, and internal audit functions.

The risk management framework covers all business lines and internal structures, including internal control functions, with full recognition of the economic significance of all the bank's risk exposures.

Internal control framework

The internal control framework at Exim Banca Românească includes the verification by independent control functions of compliance with internal control policies and procedures. Exim Banca Românească has implemented three functions independent of the business lines and units they supervise, with sufficient authority, status, and resources, namely:

a) The **risk management function**, whose activity consists in identifying, quantifying, assessing, managing, mitigating, monitoring, and adequately, promptly, and continuously reporting risks at the level of business lines as well as at the bank level. The risk management function at Exim Banca Românească has an overview of all risks and ensures compliance with the Strategy on managing significant risks. It implements risk policies and controls the risk management framework, ensuring that all significant risks are appropriately identified, assessed, measured, monitored, managed, and reported. The risk management function plays an important role within the bank, ensuring that effective risk management processes are in place;

b) The **compliance function**, whose activity consists in managing compliance risk. At Exim Banca Românească, the Compliance Policy is implemented and applied by all staff. The compliance function provides recommendations, regularly monitors and controls aspects related to the bank's compliance with the legal and regulatory framework, and provides guidance to the management body in this regard;

c) The **internal audit function** independently verifies and provides objective assurance regarding the compliance of all credit institution activities and units, including outsourced activities, with the institution's policies and procedures as well as external requirements. This function has its own status, formalized in the Internal Audit Charter.

Specifically, the chair of the Risk Management Committee, in the context of overseeing risk-related responsibilities, supervises the implementation of the ESG strategy at the bank level as well as the alignment of risk management policies with ESG standards.

The Audit Committee is responsible for verifying the alignment of internal regulations with ESG standards, while the Remuneration Committee and the Nomination Committee approve remuneration and nomination policies in accordance with ESG principles.

4.3.2 The Assessment Process for the Suitability of Members of the Management Body

The members of the bank's management body, namely the members of the Board of Directors and of the Executive Committee, must possess the necessary qualifications to hold leadership positions, understand the role they play in corporate governance, and be capable of acting objectively, critically, and independently in fulfilling supervisory and management duties.

These obligations apply both to the role held within the management body (the management body in its supervisory function or senior management) and to the role held within specialized committees.

The bank assesses the suitability of the members of the Board of Directors based on the criteria set out in Article 108, paragraph (1) of the *Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy*, approved by Law no. 227/2007, with subsequent amendments and completions, as well as the *National Bank of Romania Regulation no. 5/2013 on prudential requirements for credit institutions*, with subsequent amendments and completions, and taking into account the documentation submitted for candidacy for a position in the management body.

The Nomination Committee is tasked with actively contributing to achieving the bank's objectives regarding the selection and continuous monitoring of the suitability of members of the Board of Directors (BoD) and members of the Executive Committee (EC), as well as succession planning and the annual evaluation—or whenever necessary—of the Board of Directors and the Executive Committee as a whole, as well as of their individual members.

Based on the results of the assessment of the criteria concerning reputation, knowledge, competencies, skills, and experience appropriate to the nature, scope, and complexity of the institution's activity and the responsibilities entrusted, the members of the management body are subject to prior approval by the National Bank of Romania, in accordance with applicable regulatory requirements.

The policy on the appointment, succession planning, and suitability assessment of persons holding key functions provides the necessary framework for assessing the suitability of such persons before they are appointed, as well as for reassessing their suitability, as needed, according to the requirements defined by the policy. The policy defines the requirements for identifying appropriate candidates/employees to fill the key positions established at bank level, the framework for developing their competencies in relation to the bank's business strategy and strategic objectives, as well as the criteria for assessing and reassessing their suitability and planning their succession.

The policy on the induction and training of the members of the management body is designed to contribute to the ongoing development of the knowledge, competencies, and skills required by the bank's management body in order to fulfill its management responsibilities at bank level.

At Exim Banca Românească, the induction and training of the members of the management body are carried out with the purpose of contributing to the development and maintenance of the knowledge and skills required for business development and for fulfilling management responsibilities at bank level, in accordance with the provisions of their mandate contracts.

4.3.3 Diversity and Human Rights

The policy on promoting diversity management promotes and supports the expression of employees' individual needs so that each can maximize their potential at a high level of performance and turn differences into added value for the bank.

The diversity management policy at bank level implies acknowledging and leveraging differences to obtain positive outcomes both individually and at team and organizational level.

The diversity management policy at Exim Banca Românească applies to the members of the management body, both in their supervisory and executive functions, as well as to the bank's employees, and takes into account the aspects by which employees differ from each other: education and professional/practical experience, gender, age, ethnicity, beliefs and ideologies, equal opportunities and fair treatment for promotion to leadership roles, and also personal traits such as skills, competencies, needs, and working styles.

Diversity, respect for human rights, and ensuring equal opportunities in recruitment and remuneration processes are key elements that characterize all relationships with employees, clients, and other partners.

The remuneration policy aims to strengthen the bank's market position by leveraging the contribution of human resources, attracting qualified, competitive, and ethical personnel capable of achieving the bank's objectives.

The human resources policy, as an integral part of the human resources strategy, establishes the principles, organization, responsibilities, and components of the human resources function, in order to achieve the objectives in this area as set out in the General Strategy of Exim Banca Românească.

The policies, procedures, and practices in the field of human resources are based on an overarching vision of human resource management that supports sustainable development and the consolidation of an organizational culture based on performance and employee development. These are grounded in the principles and practices of corporate governance developed at bank level, aiming to strengthen the bank's market position by aligning and integrating human resources policies with business processes, in order to support employee performance, so that individual and team performance indicators correspond to the bank's business and sustainability objectives.

4.4 Compliance, Ethics and Business Responsibility

Anti-Corruption Policy and Strategy

Exim Banca Românească, a signatory of the declaration on the commitment to the organizational integrity agenda in the context of the National Anti-Corruption Strategy 2021–2025¹, operates in a transparent and consistent internal control environment that ensures the identification, assessment, monitoring, and mitigation of risks to which it is exposed in carrying out its activities, with a view to achieving long-term objectives.

Exim Banca Românească has a zero-tolerance policy towards any acts of corruption, condemns corruption in all its forms, and firmly expresses its commitment to continuing anti-corruption efforts through appropriate legal means, aimed at implementing anti-corruption measures to ensure effective control over its activity.

The anti-fraud and anti-corruption policy and culture are promoted and supported by the management of Exim Banca Românească through actions and measures such as: encouraging professional conduct in line with high standards of ethics and professionalism; promoting a culture of avoiding conflicts of interest; awareness and compliance with the Code of Ethics; implementing an organizational culture based on internal control (cross-checks, higher authorization levels for certain operations); ensuring a procurement process that respects the principles of equal treatment, non-discrimination, proportionality, and mutual recognition, etc.

Ongoing training and education of staff is an essential tool for preventing acts of corruption, by increasing staff awareness of acceptable ethical and professional standards, the risks and impact that acts of corruption can have on the reputation and assets of Exim Banca Românească, and the penalties applicable in such cases. Accordingly, in 2024, all members of the management body and all Group staff were informed and trained regarding the strategy and policies in this area.

In 2024, at bank level:

- there were no incidents of corruption involving employees,
- there were no incidents of corruption that led to the termination or interruption of collaboration with business partners/suppliers,
- there were no lawsuits filed against the bank or its employees concerning acts of corruption.

The main tools through which Exim Banca Românească ensures the prevention of acts of corruption are: a rigorously designed management framework based on sound governance principles, and a transparent environment in relation to stakeholders. Measures identified by the management body to mitigate institutional risks and vulnerabilities to corruption are included in an Integrity Plan.

Moreover, according to the bank's Anti-Corruption Strategy, the management of Exim Banca Românească must be informed in a timely manner about any potential or actual acts of corruption occurring at the organizational level and which may arise or be identified as a result of conflicts of interest; internal fraud; non-compliance with the Staff Code of Ethics; the Whistleblower channel; customer complaints.

Compliance with Competition Legislation

Exim Banca Românească promotes a culture of compliance with the rules and legal provisions regarding competition, in order to ensure high standards of professional conduct and integrity in its activities.

Compliance with competition rules is a key priority across all activities, to maintain a healthy competitive environment. Staff are instructed not to engage in arrangements, agreements, or practices that may result in restricting or distorting competition and not to abuse their market position by resorting to anti-competitive practices that could harm the interests of competitor banks. Information about competitors and their products may only be obtained from independent sources and never from a competitor's representative.

¹ The statement regarding the commitment to the organizational integrity agenda in the context of the National Anti-Corruption Strategy 2021-2025 is published on the [Exim Banca Românească website](#).

Compliance with Legal Regulations

The way Exim Banca Românească carries out its activity is focused on strict compliance with applicable national and international legal regulations.

Compliance with sector-specific financial-banking legislation, the adoption of best practices, and the implementation of high standards represent a priority for the bank. These are transposed into internal regulations and brought to the attention of employees for proper implementation.

The National Bank of Romania, as part of its supervisory activities, verifies the application, implementation, and transposition into internal regulations of the legal provisions applicable to the banking system and may propose improvements to the governance framework, strategies, processes, and mechanisms implemented within the credit institution and, if necessary, apply fines, penalties, or sanctions.

Conflict of interest

The Bank promotes a culture of avoiding conflicts of interest so that the members of the management body and employees, in the performance of their duties and responsibilities, act in the interest of the institution without pursuing their own personal, financial, or other interest in fulfilling their tasks and do not use their positions to obtain undue benefits for themselves, their families, or close persons.

The monitoring and management of conflicts of interest within Exim Banca Românească are governed by the *Policy on the Management of Conflicts of Interest*, which sets out the manner in which conflicts of interest are to be managed by identifying, assessing, managing, and reducing/mitigating or preventing potential and actual conflicts of interest both at the institutional level and with regard to the personal interests of employees, including members of the management body, that could adversely affect the fulfilment of their duties and responsibilities.

The Bank takes appropriate measures to prevent the negative effects of conflicts of interest on the interests of its clients as well as on the Bank's reputation.

During 2024, no situations were identified that would give rise to an actual conflict of interest within Exim Banca Românească.

In addition, through the *Whistleblowing* Channel, appropriate internal whistleblowing procedures are implemented and made available in written form to all Bank employees. These procedures may be used to raise legitimate and substantive concerns regarding the management of activities by reporting actual or potential violations of regulatory or internal requirements. The procedures ensure the protection of personal data regarding both the individuals reporting the violations and those allegedly responsible and provide the possibility to raise such concerns outside the normal reporting lines.

All notifications received through the internal *whistleblowing* channel are analysed, investigated, communicated to the Bank's management, and, where appropriate, appropriate measures are taken.

Information security

In the context of the continuous development of the financial-banking sector and the digital transformations in the field, information security and personal data protection are priorities. Exim Banca Românească has implemented and maintains an adequate security system to protect information in terms of confidentiality, availability, and integrity.

Roles and responsibilities

To implement information security, clear roles and responsibilities are defined. The governance role in information security is assigned to the Department of Security and Banking Protection (DSPB), an independent structure subordinated to the Executive President. It monitors the implementation of information systems security and provides support to the Bank's senior management in identifying, assessing, and reporting security risks. Concurrently, DSPB ensures the drafting, updating, and maintenance of internal regulations (policies, procedures, instructions, etc.) describing the processes for implementing information security and develops continuous training and awareness programs for users (employees and clients) regarding security risks. The administrative role in information security (implementation, parameterization, management of security solutions/applications) lies with the IT Operations Directorate, ensuring segregation of duties and efficient coordination of activities.

Technical and organizational measures

Due to the nature of the information and personal data processed by the Bank, organizational and technical measures have been implemented based on security standards and the latest guidelines and practices in the field. Solutions are in place for vulnerability scanning of networks and IT systems, and platforms are used for collecting, storing, and analysing security events and abnormal network behaviours extracted from application, system, and network device logs. This ensures real-time visibility of information and security events, and a central console that correlates events and data flows generates security alerts that enable accelerated analysis and handling of security incidents.

Handling security incidents

Details such as the type of attack, target, timestamp, resource value, vulnerability status, and event history all help to quickly detect, prevent, and investigate potential security incidents. In order to detect and prevent security incidents in a timely manner, security bulletins received through cooperation with the National Cyber Security Directorate (DNSC), SWIFT, EUROPOL, and CyberINT (via ARB) or from other public sources are analysed. No major security incidents were detected or reported in 2024.

Protection of personal data

Through its internal regulations regarding the management of security incidents, Exim Banca Românească has established, in accordance with applicable legal requirements, mechanisms for reporting (to the relevant supervisory authority and, where applicable, to clients) security incidents involving personal data. If these incidents are likely to pose a risk to the rights and freedoms of affected individuals, they must be reported to the supervisory authority. If, in addition, the risk is high, the incidents must also be reported to the individuals concerned.

In 2024, no reportable security incidents involving personal data were identified.

As the security of customer data is a sine qua non condition for long-term success in the financial-banking field, data security remains a priority for the Bank. Accordingly, the following measures were implemented and maintained in 2024:

- The Bank has appointed a Data Protection Officer (DPO), reporting to the highest level of management at Exim Banca Românească, in accordance with applicable legislation, who informs and advises the Bank and employees on their data protection obligations;
- The rules for handling data subject requests concerning one or more rights under data protection legislation are internally regulated, with defined roles and responsibilities;
- The DPO function is integrated into specific workflows, such as those related to security incident management, data subject request management, outsourcing of activities involving personal data processing, implementation of new technologies, etc., in accordance with the Bank's Personal Data Processing Policy and its related internal regulations;
- The Bank organizes annual mandatory training programs on data protection for all employees, followed by assessments of the knowledge acquired
- In addition, Exim Banca Românească employees benefit from continuous training through data protection materials made available by the Bank;
- For the members of the Board of Directors of Exim Banca Românească, an annual training program on data protection is provided.;

4.5 Transparency in the Relationship with Stakeholders

At Exim Banca Românească, the following categories of stakeholders have been identified: shareholders, employees (represented individually and collectively), clients (represented individually or through various associations), the business community (represented by different associations), the communities where the bank operates and their members (individuals or organizations), suppliers, central and local public institutions, and business partners.

The bank is permanently engaged in dialogue with all the aforementioned categories, alongside whom it can contribute to improving the business environment and fostering the sustainable development of communities. Thus, the bank is a promoter of continuous dialogue between the private sector, decision-makers, and social partners.

As regards institutionalized dialogue, the bank's involvement materializes in various actions: public statements and communications, participation in public consultation processes with authorities through professional associations, business organizations, or employer associations, as well as participation in debates organized by media partners, professional organizations, and civil society groups.

These actions aim to identify the challenges facing the business environment as well as the solutions that can benefit all involved parties and the broader community. These efforts are grounded in the mechanisms and principles of corporate governance, ethical behaviour, and professional relationships based on transparency and integrity.

2024

The image features a minimalist design with the year '2024' in a bold, dark blue sans-serif font. The text is positioned in the lower half of the frame. Below the text, the background transitions into a series of overlapping triangles in various shades of blue, creating a dynamic, geometric pattern that fills the bottom portion of the image. The top half of the image is a solid, light blue color.

2024

RISK MANAGEMENT

5. RISK MANAGEMENT

General Considerations

Risk management is an integral part of all decision-making and business processes within Exim Banca Românească. The bank's management and structures continuously assess the risks to which its activity may be exposed, potentially affecting the achievement of objectives, and take action concerning any changes in the conditions under which the bank operates.

Within the bank, risk management activities are primarily carried out at the following levels:

- the responsibilities of the Board of Directors (BoD) and the Risk Management Committee, as a consultative and assisting body to the BoD, for the approval and periodic review of the bank's risk appetite and risk-bearing capacity, risk profile and risk tolerance for the significant risk categories assumed by the bank;
- the responsibility of the Management Committee (MC) to ensure the implementation of the risk management strategy and policies approved by the BoD and to develop procedures and methodologies for identifying, measuring, monitoring, and controlling risks so that the bank maintains effective risk management processes in line with the nature and complexity of its relevant activities;
- in the decision-making process, the risk management function ensures that risk aspects are adequately taken into account, but responsibility for the decisions taken remains with the operational units, support functions, and ultimately the bank's governing body;
- management of the bank's exposure to foreign exchange risk, interest rate risk, liquidity risk, etc., by Asset and Liability Management;
- operational risk management at the level where risks are created;
- independent review function by the Internal Audit Department.

The bank's risk monitoring and control functions have clearly defined responsibilities, independent of the risk-taking functions.

The Significant Risk Management Strategy establishes the risk appetite that Exim Banca Românească considers acceptable and is willing to assume, the risk tolerance, and the risk profile for the significant risk categories assumed by the bank, aiming to optimize the risk-return ratio and align the assumed risk appetite with the capital requirements calculated under sound and prudent activity.

The bank uses relevant risk indicators, with defined thresholds, specific to each risk category, which are periodically and continuously monitored and adjusted according to business development and economic environment dynamics.

The bank periodically conducts a self-assessment of risks and related controls. If a high-risk level results after applying controls, risk mitigation actions are mandatory.

The risk management framework of Exim Banca Românească covers all business lines, internal units, including internal control functions, with full recognition of the economic significance of all risk exposures.

The risk management framework includes all relevant risks, considering both financial and non-financial risks, including credit risk, market risk, liquidity risk, concentration risk, operational risk, IT and security risk, reputational risk, legal risk, conduct risk, compliance risk, and strategic risk.

For the purpose of calculating regulatory capital requirements, Exim Banca Românească uses the following approaches:

- the standardized approach for credit risk;
- the standardized approach for market risk;
- the basic indicator approach for operational risk.

Internal Capital Adequacy Assessment Process (ICAAP) / Internal Liquidity Adequacy Assessment Process (ILAAP)

Exim Banca Românească ensures that the own funds held sufficiently cover the capital needs for risks under Pillar I – credit risk, market risk, and operational risk – plus capital requirements for significant risks not included in Pillar I (e.g., concentration risk, interest rate risk, etc.).

The capital requirement for covering risks not included in Pillar I is determined in accordance with internal procedures.

In terms of ILAAP, Exim Banca Românească seeks to maintain adequate levels of reserves and liquidity indicators, assessing the assumed risks in line with business objectives and the framework for identifying, measuring, managing, and monitoring liquidity risk.

Climate Risk Management

In the context of international initiatives regarding climate change and sustainable development, a series of actions have been launched at the level of national authorities and regulatory and supervisory bodies, with an impact on the financial-banking sector. Given the fundamental objective of the banking system to finance the economy, in the context of climate change and sustainable development, the banking system plays an additional role in redirecting financial flows and thereby supporting the transition to a sustainable economy.

Thus, at the bank level, managing climate change risks has become a constant concern. Climate risks affect certain risks already being managed, such as credit, market, and liquidity risks.

Physical risk – refers to the financial impact caused by a changing climate, including frequent extreme weather events and gradual changes in climate, as well as environmental degradation such as air, water, and land pollution, water stress, biodiversity loss, and deforestation. Physical risk is classified as “acute” when it arises from extreme events such as droughts, floods, and storms, and “chronic” when it results from progressive changes such as rising temperatures, sea level rise, water stress, biodiversity loss, land use changes, habitat destruction, and resource shortages.

Transition risk – refers to the financial loss of an institution that may result, directly or indirectly, from the adjustment process toward a more sustainable, low-carbon, and environmentally friendly economy. This could be triggered, for example, by the relatively sudden adoption of climate and environmental policies, technological progress, or shifts in market sentiment and preferences.

Within the bank, the management of climate change-related risks involves:

- encouraging projects and activities that have a favorable environmental or societal impact, generally, and considering the debtor’s exposure to environmental, social, and governance (ESG) factors in the financing request analysis process;
- identifying and classifying debtors exposed to high ESG-related risks and conducting more in-depth analyses of the business models of these debtors, including by identifying and analyzing measures to mitigate these risks.

In the process of evaluating real estate collateral, the valuation reports prepared for the bank include information related to ESG factors based on inspection and documentation made available in the appraisal report, such as:

- Type of heating source/fuel used;
- Energy performance class – information taken from the Energy Performance Certificate;
- Electric vehicle charging stations;
- Building certifications (e.g., Office buildings – BREEAM, LEED, etc.);
- Physical/environmental risks associated with the evaluated assets and how they were identified (based on inspection, documentation, etc.).

Thus, the final estimated market value of real estate collateral takes these factors into account to the extent that they are recognized by the market.

2024



2024

STRATEGIES AND PRIORITIES

6. STRATEGIES AND PRIORITIES

Exim Banca Românească aims to offer customized financial solutions, thus becoming the preferred banking partner of its clients, through innovation and continuous development. By efficiently utilizing resources, the bank supports the business potential of its clients and contributes to sustainable economic growth. Believing that the bank's success is inextricably linked to the development of the community, it is involved in supporting national interest projects, regional development, the growth and competitiveness of SMEs, the promotion of exports and Romanian investments abroad, as well as increasing financial intermediation, thus contributing to building a better future for Romania.

The strategy of Exim Banca Românească for the 2025–2028 period foresees continued sustainable organic growth, focusing on improving the efficiency and profitability of operations. The main objectives target strengthening market position, expanding the product and service portfolio, and intensifying digitalization.

A major emphasis is placed on digital transformation. The bank aims to modernize its IT infrastructure and implement data analytics solutions to optimize decision-making processes and personalize client offerings. This process includes enhancing Internet and Mobile Banking services and developing new digital features for all client segments.

The business model is based on an omnichannel approach, combining traditional distribution channels (the physical network of branches and business centers) with modern digital channels. The bank will invest in modernizing the ATM/MFM network and expanding partnerships with credit intermediaries to increase service accessibility and reach more clients.

The strategy also promotes sustainable financing, aligning with sustainable lending principles and increasing the share of green financing in the portfolio. The bank will analyze and manage climate change-related risks, integrating ESG criteria into its risk analysis and management processes. This approach is reflected in the development of specific products for investment projects in renewable energy and energy efficiency.

Another key objective is optimizing operational efficiency. The bank aims to improve internal processes, simplify procedures, and use digital technologies to reduce costs and increase productivity.

Exim Banca targets the consolidation of its position in the corporate market by providing complex and customized financial solutions tailored to the specific needs of each client, including trade finance, factoring, and other specialized financial services. Through strategic partnerships and a proactive approach, the bank intends to attract new corporate clients by offering access to sustainable financing, including green products and dedicated financing programs for investment projects with social and environmental impact.

The retail strategy focuses on improving the customer experience through advanced digitalization, offering easy access to banking services via Internet and Mobile Banking and the ATM network, alongside an optimized physical presence.

2024

SUSTAINABILITY REPORT

7. SUSTAINABILITY REPORT

7.1 General Information

7.1.1 Basis for Preparing the Sustainability Statement

7.1.1.1 General Basis for Preparing the Sustainability Statement – BP-1

The sustainability report for the year 2024 presents the necessary information to understand the Bank's impact on sustainability-related matters as well as the information needed to understand how these matters affect the Bank's development, performance, and position. It was prepared in accordance with Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards (ESRS), and based on NBR Order no. 1/2024 amending and supplementing the National Bank of Romania Order no. 27/2010 for the approval of accounting regulations in line with IFRS and the Order no. 6/2015 for the approval of accounting regulations in line with European directives, which transposes in Romania EU Directive 2022/2464 on Corporate Sustainability Reporting (CSRD).

This is the fourth non-financial reporting exercise conducted by Exim Banca Românească SA. In the first three years, reporting was carried out based on the requirements of Directive 2014/95/EU amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups (NFRD), whereas this year the reporting is based on CSRD and covers the activity carried out between 01 January – 31 December 2024. The report is prepared on a consolidated level and includes information regarding the activity of Exim Banca Românească SA, as well as certain relevant information on its subsidiary Compania de Asigurări – Reasigurări Exim România (EximAsig) SA.

The information provided regarding EximAsig SA considers the specifics, size, and complexity of its operations, with data points containing only relevant information that could be included in the consolidated quantitative indicators or that are implemented differently at the individual level compared to the group level, such as policies. The content of the report includes clarifications in the relevant chapters concerning whether the presented information includes or excludes EximAsig data. In the absence of such clarification, it will be assumed that no information about EximAsig is included in that section of the report.

The consolidation objective is the same as for the financial statements. However, EximAsig SA currently has no individual or consolidated reporting obligations under Article 19a(9) or Article 29a(8) of Directive 2013/34/EU as transposed locally by the Financial Supervisory Authority (ASF).

The sustainability report also includes information on significant impacts, risks, and opportunities related to the Group through its direct and indirect business relationships in the upstream and/or downstream value chain ("value chain information").

The Bank does not disclose classified or sensitive information or information related to intellectual property, know-how, or results of innovation, in accordance with ESRS 1, Section 7.7, while ensuring the provision of all other mandatory information and the overall relevance of the disclosures.

Additionally, the Bank has not used the exemption from disclosing information on impending developments or ongoing negotiations, as provided under Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

To identify the data points to be included in the Sustainability Report in accordance with ESRS, a materiality assessment was conducted in 2024, through which material topics, sub-topics, and sub-sub-topics were identified. The materiality analysis also included the activity of the subsidiary EximAsig SA.

Thus, throughout the report, information will be provided on how the Bank manages environmental, social, and governance matters, as well as other general sustainability information regarding the specific circumstances of the statement, governance at the management and supervisory levels, strategy, business model and value chain, stakeholder interests and perspectives, significant impacts, risks and opportunities, policies, actions, resources, and indicators related to material topics. The report also includes information required by EU Regulation 852/2020 on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (EU Taxonomy), in accordance with the delegated acts issued for its implementation.

Furthermore, in accordance with CSRD provisions transposed locally via NBR Order no. 1/2024, the Sustainability Report of the Exim Banca Românească Group was audited as a limited assurance engagement by Deloitte Audit SRL.

7.1.1.2 Specific Circumstances of the Sustainability Statement – BP-2

7.1.1.2.1 Time Horizon

The sustainability report is an integral part of the Administrators’ Report and covers the reporting period corresponding to the 2024 financial year.

This report is prepared for the first time in accordance with the ESRS Standards, and according to their provisions, reporting entities are not required to present comparative data with the previous period for the first reporting year. However, in certain cases, comparisons are made voluntarily to help illustrate the progress achieved compared to the reference year.

The time horizons considered in the double materiality analysis, for both impact materiality and financial materiality, are aligned with those defined in ESRS 1 Section 6.4, respectively:

- short term: 0–1 year;
- medium term: 1–5 years;
- long term: more than 5 years.

7.1.1.2.2 Value Chain Estimation

Exim Banca Românească is required to prepare consolidated financial statements and is therefore also required to prepare the sustainability statement at the group level, including its subsidiary EximAsig SA, since the latter has no individual reporting obligations.

Additionally, the sustainability report was extended to include information on significant impacts, risks, and opportunities related to the Group through its direct and indirect business relationships in the upstream and/or downstream value chain (“value chain information”). Following reasonable efforts to obtain them, the information to be reported on its upstream and downstream value chain was estimated using all reasonable and justifiable information, such as sector averages and other proxies.

The Bank uses certain indicators that include value chain data (upstream and/or downstream) estimated using indirect sources, such as industry averages or other substitutes, mainly in relation to the calculation of greenhouse gas emissions. Details regarding the indicators, the basis of preparation, the resulting accuracy level, and any planned actions to improve accuracy in the future related to GHG emissions calculations are presented in section 7.2.2 on Climate Change.

Regarding the identified value chain, the main components are presented in the table below:

Upstream and Own Operations	Business partner relationships (commercial partnerships, suppliers)
	Buildings, Equipment, Owned Assets, Vehicle Fleet
	Human Capital (employees and their representatives)
	Compliance with legal and regulatory requirements

Downstream	Retail (exposures to individuals, sole proprietors, microenterprises)
	Non-Retail (exposures to small, medium, and large enterprises, public sector)

7.1.1.2.3 Sources of Uncertainty in Estimates and Results

Exim Banca Românească makes all necessary efforts to obtain and use information that meets the qualitative characteristics provided by the ESRS Standards. However, in this report, Exim Banca Românească relies on information obtained across the value chain both in the context of contractual or partnership relationships and legal or regulatory obligations applicable to third parties.

As such, the Bank has identified certain sections of the report where quantitative indicators or monetary values are presented that may involve a relatively high degree of measurement uncertainty, such as:

- within the taxonomy reporting, the Bank's analysis regarding eligibility and/or alignment is also based on information received from counterparties that themselves have reporting obligations or use their own techniques for assessing compliance with the DNSH criterion;
- for calculating greenhouse gas emissions, the Bank uses estimates based on measurement techniques, such as employee questionnaires regarding CO₂ emissions from commuting.

Therefore, the main sources of uncertainty (e.g., value dependency on a future event outcome, on a measurement technique, or on the availability and quality of data in the entity's upstream and/or downstream value chain), as well as limitations, assumptions, approximations, and relevant reasoning are presented in the specific sections of this report (e.g., in sections 7.2.1 and 7.2.2).

7.1.1.2.4 Changes in the Preparation or Presentation of Sustainability Information

The 2024 Sustainability Report represents the bank's first sustainability statement prepared in accordance with the ESRS Standards. As per these provisions, in the first year of reporting, reporting entities are not required to present comparative data with the previous period. However, in some instances and on a voluntary basis, this report includes comparisons to help create a picture of the progress made compared to the reference year.

7.1.1.2.5 Reporting Errors from Previous Periods

The 2024 Sustainability Report, being drafted for the first time in accordance with the ESRS Standards, does not present comparative data with the previous period and, therefore, does not contain information regarding reporting errors. However, regarding Taxonomy Reporting, it is worth noting that the reporting basis was extended to include other environmental objectives, and the reporting processes were refined. Certain details in this regard are presented in section 7.2.1.

7.1.1.2.6 Particularities in Reporting

This Sustainability Report generally includes information that stems only from legislative acts or generally accepted sustainability reporting frameworks, especially those provided by the ESRS Standards. However, in certain processes such as the double materiality analysis or the calculation of GHG Emissions, reference standards such as GRI, SASB, OECD publications, etc., were used. These references are mentioned, where necessary, in the respective sections.

Additionally, the bank has included in this Report, in section 7.2.1, the information required under Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, as well as in the Commission delegated regulations specifying the content and other modalities of such information, including information related to each of the environmental objectives.

7.1.1.2.7 Inclusion of Information by Reference

This report does not contain references to the Administrators' Report or to the related financial statements. All necessary information is provided within this Report.

7.1.2 Governance

7.1.2.1 The Role of Administrative, Management and Supervisory Bodies – GOV-1

7.1.2.1.1 Composition and Diversity of the Bodies

The governance structure of Exim Banca Românească includes:

- the management body in its supervisory function – the Board of Directors, and
- the senior management – the Management Committee. The bank's senior management consists of natural persons empowered with the day-to-day management of the credit institution.

According to the General Shareholders' Meeting Resolutions no. 10/06.10.2023 and no. 12/25.11.2024, throughout 2024, the Board of Directors was composed of 5 members: 2 executive directors and 3 non-executive directors, of which 2 were independent non-executive directors.

Given that the selection procedure for new directors was underway in 2024, during the period 03.01.2024 – 06.12.2024, the Board of Directors was composed of directors with provisional mandates, as per the GSM Resolution no. 10/06.10.2023, with capacity to perform their duties.

During the period 06.12.2024 – 31.12.2024, the Board of Directors was composed of directors with 4-year mandates, ending on 24.11.2028, according to GSM Resolution no. 12/25.11.2024 and BNR Letter no. VI/7/17837 of 03.12.2024, with full capacity to perform their duties.

Starting from February 2025, following the authorization by the National Bank of Romania of the new directors appointed by GSM Resolutions no. 12 and 13 of 25.11.2024, the structure of the Board of Directors of Exim Banca Românească consists of 9 members: 4 executive directors and 5 non-executive directors, of which 4 are independent non-executive directors.

There are no employee representatives within the management body of Exim Banca Românească.

The members of the Board of Directors and of the Management Committee of Exim Banca Românească must have the necessary qualifications to occupy management positions, understand their role in corporate governance, and be able to act objectively, critically, and independently in carrying out supervisory and management duties. These obligations apply both with respect to their role within the management body (in the supervisory function or in senior management), as well as their positions within the specialized committees of the bank, for non-executive members.

The members of the management body of Exim Banca Românească must possess appropriate professional knowledge, good reputation, honesty, integrity, and independent thinking, regardless of the specific duties and responsibilities of the role, including their position within the management body and its supporting committees (details regarding the expertise of the members of the management body, access to training and advisory support can be found in subchapter 7.1.3.3).

These qualities of the members of the management body were validated through the selection and approval processes by the competent bodies and authorities.

Regarding gender diversity within the bank's management body, among the members of the Board of Directors in 2024, 20% were women and 80% were men.

7.1.2.1.2 Roles and Responsibilities of Governance Bodies in Overseeing the Management of Significant Impacts, Risks, and Opportunities

According to the Rules of Organization and Operation (ROF) of Exim Banca Românească, the Board of Directors is responsible for setting the bank's strategy, objectives, and applicable policies, monitoring the management decision-making process, and ensuring a rigorously designed governance framework that guarantees compliance with banking laws and regulations, as well as the implementation of strategic sustainability objectives and alignment of the bank with sustainability requirements.

Both the Board of Directors and the supporting committees of the supervisory function have responsibilities in creating a strategic and procedural framework for managing the bank's impact on the economy, the environment, and society, including on human rights.

The responsibilities of the Board members are in line with the mandate received from shareholders, holding ultimate accountability for the bank's performance. The Rules of Organization and Operation specify duties such as setting, approving, and overseeing the implementation of the bank's overall business strategy and key policies, considering the applicable legal and regulatory framework, financial interests, and the institution's long-term solvency.

Given this responsibility, the Board of Directors establishes and approves the bank's sustainability strategy for a horizon of at least 3 years, which sets objectives in the three dimensions: Environment, Social, and Governance, closely aligned with the business strategy.

The Board of Directors also approves the business model of Exim Banca Românească, aiming to achieve a sustainable model with long-term objectives, related both to the internal development of the organization at high standards of integrity and to the support of clients' investment projects, actively overseeing risk management systems.

The Rules of Organization and Operation of Exim Banca Românească also outline the responsibilities of the Board of Directors and its advisory committees concerning the approval of strategies and policies and the supervision of their implementation, including ESG principles incorporated into the sustainability strategy, remuneration and nomination policies, and the assessment of the adequacy of governance members.

Governance members have been assigned specific sustainability-related objectives according to the Exim Banca Românească Sustainability Strategy. Each of these individual criteria corresponds to the member's area of expertise, ensuring alignment between performance indicators and the bank's sustainability goals, thus enabling organic growth of ESG initiatives for achieving specific targets.

The Management Committee, as the senior management body, is responsible for implementing the strategy, objectives, and applicable policies to ensure compliance with banking regulations and the execution of strategic sustainability goals. It ensures the necessary resources are allocated to achieve these objectives and reports on implementation progress to the Board of Directors.

Specifically, the Chairman of the Risk Management Committee oversees the implementation of the ESG strategy at the bank level and the alignment of risk management policies with sustainability standards.

The Audit Committee verifies the alignment of internal regulations with ESG standards.

The Nomination Committee approves nomination policies aligned with ESG principles, and the Remuneration Committee approves remuneration policies consistent with ESG principles and contributes actively to achieving the bank's objectives related to the implementation of its diversity policy. The Remuneration Committee also ensures that the general principles and policies regarding staff remuneration and benefits align with the business strategy, the goals included in the sustainability strategy, the values, and the long-term interests of the bank, in accordance with the ROF.

General framework for assessing sustainability risks in NCS activities

The general framework for assessing sustainability risks within NCS activities is approved by the Interministerial

Committee for Financing, Guarantees, and Insurance (CIFGA), the decision-making body for all NCS activities, under the provisions of Law no. 96/2000, republished, as subsequently amended, and Government Decision no. 534/2007.

Sustainability-related risks are integrated into the Exim Banca Românească NCS Policy on Sustainable Development and are considered in NCS financing, guarantee, and insurance activities at both individual and portfolio levels.

For activities carried out as Romania's Export Credit Agency (ECA), Exim Banca Românească NCS has developed a sustainability risk management framework aligned with OECD-specific rules, namely the OECD Arrangement on Officially Supported Export Credits and the OECD Recommendation on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence.

OECD alignment is included in the "Policy on Environmental and Social Impact in the Field of Officially Supported Export Credits (export credits with a maturity longer than two years)" and in the General Procedure "Environmental and Social Impact Assessment of Projects Benefiting from Official Support from Exim Banca Românească on behalf of the State," approved by CIFGA.

Exim Banca Românească NCS reports annually to CIFGA and the Board of Directors on ESG activities (number and type of projects assessed from an ESG perspective), the status of meeting agreed conditions and measures for projects classified as categories A and B, and proposals for revising or supplementing environmental and social policies and procedures to ensure effective implementation and alignment with national and international standards and practices.

To ensure transparency with stakeholders and fulfill its responsibilities in the OECD accession process, Exim Banca Românească NCS:

- Publishes information on category A projects on www.eximbank.ro at least 30 days before CIFGA approves insurance commitments.
- Publishes a list of category A projects on www.eximbank.ro for which it provided official support, including information on social/environmental impact and applicable evaluation standards, updated annually.
- Includes aggregate information on category A and B projects supported by Exim Banca Românească through official instruments in the bank's annual activity reports.
- Reports semi-annually to the Export Credit Working Groups of the Council of Europe and OECD on approved projects classified under categories A and B for which official support was granted.

In 2024, the bank carried out its first double materiality analysis under the European Sustainability Reporting Standards (ESRS), identifying the bank's impacts, risks, and opportunities. The results of this analysis were presented to the Board of Directors for review and approval.

The 2024 exercise was conducted under the "ESG Concepts Implementation" consulting program in collaboration with external consultant Ernst & Young.

The double materiality analysis will be conducted periodically by the responsible structures through formalized processes within the internal regulatory framework, based on a methodology for double materiality analysis to be approved by the Management Committee. This methodology and related internal regulations will include processes, controls, and reporting. Starting in 2025, internal regulations will be updated to include sustainability requirements, ESG factors, and related risks as part of the ESG Requirements Implementation consulting program.

These changes may include setting objectives and/or limits, as well as supervision at the governance level through quarterly reporting.

By the end of 2026, the ROF, the Policy on the Governance Framework of Exim Banca Românească, and the Sustainability Norm will explicitly define the roles and responsibilities of the governance body and its committees regarding the oversight of impacts, risks, and opportunities.

Additionally, by the end of 2026, the bank will align the Significant Risk Management Strategy with the ROF concerning the monitoring and management of material risks, including sustainability-related risks. The Significant Risk Management Strategy will include specific control responsibilities to manage exposure to significant risks while considering sustainability-related risks. This strategy is approved by the Board of Directors, which also supervises its implementation by senior management.

In 2025, the improvement of the internal risk management framework will include specific actions in collaboration with Ernst & Young, under the ESG Requirements Implementation project initiated in 2024. The 2025 focus will be on: integrating ESG factors and related risks into the credit risk appetite and the evaluation of operational, market, legal, and reputational risks; developing monitoring processes for climate and environmental risks; and enhancing the internal capital and liquidity adequacy assessment process (ICAAP/ILAAP) to include climate and environmental risks.

7.1.2.1.3 Expertise and Competencies of the Governing Bodies in Sustainability Matters or Access to Such Expertise and Competencies

In the process of assessing the suitability of the members of the governing body, the bank evaluates their adequacy based on the criteria stipulated in Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy, approved by Law no. 227/2007, as subsequently amended, and in NBR Regulation no. 5/2013 on prudential requirements for credit institutions, as subsequently amended, and also taking into account the documentation submitted for the candidacy for the position of member of the governing body.

Based on the results of the evaluation of the criteria related to reputation, knowledge, competencies, skills, and experience appropriate to the nature, scale, and complexity of the institution's activities and the entrusted responsibilities, the members of the governing body are subject to prior approval by the National Bank of Romania in accordance with the applicable regulatory requirements.

Moreover, Exim Banca Românească continuously monitors the adequacy of the governing body members in order to identify, in the context of any new relevant element, situations that require a reassessment of their adequacy and carries out such reassessment accordingly.

To ensure the continuous training and development of the governing body members, in line with the responsibilities of their appointed roles, the bank prepares and approves annually the Training Program for the Members of the Governing Body, which defines the topics for training and development in order to achieve the established objectives.

For 2024, the Training Program for the governing body members was developed in accordance with NBR Regulation no. 5/2013 on prudential requirements for credit institutions, as subsequently amended, which stipulates that members of the bank's governing body, namely the Board of Directors and the Management Committee, must possess the necessary training to effectively fulfill the strategic and business objectives as well as the Sustainability Strategy of Exim Banca Românească for the 2024–2026 period.

The objectives of the 2024 Training Program for the governing body members also included ensuring the implementation of sustainability and ESG-related measures and the continuous updating of the members' knowledge in order to maintain the required level of professional competence, expertise, and skills to fulfill their responsibilities, including in the area of sustainability. In this context, the 2024 Training Program included a module on Risks, Opportunities, and Challenges in ESG, and the training was based on updated information delivered by subject-matter experts.

It is worth noting that ESG risks are reflected in the bank's standard risk categories, and the expertise and competencies of the governing body members necessary for managing these risks are being continuously strengthened and reassessed.

7.1.2.2 Reporting of Sustainability Matters to the Administrative, Management, and Supervisory Bodies – GOV-2

Exim Banca Românească has a Sustainability Strategy for the 2025–2027 period, developed to ensure an appropriate framework for implementing sustainability requirements, aligned with the sustainable development goals of the European Union. Strategic objectives have been defined for the bank’s fundamental approach to sustainable development, along with specific actions aligned with business objectives.

The Strategy, Development and Projects Department within the bank reports to the Management Committee and/or Board of Directors on the progress of strategic objectives and the implementation of sustainability plans on an annual and semi-annual basis.

In addition, the Financial Planning and Analysis Department is responsible for reporting on sustainability matters, by establishing the methodology related to the EU Taxonomy Regulation requirements and capturing the relevant information from impacted departments for inclusion in the annual administrators’ report, and ensures that the Sustainability Report is audited in accordance with applicable requirements.

The administrators’ report includes the sustainability reporting, i.e., the information necessary to understand the entity’s impact on sustainability matters and how sustainability affects its development, performance, and position, which is validated by auditors through a limited assurance opinion.

Furthermore, any other material sustainability aspects covered by the internal regulatory framework are submitted for information and/or approval to the governing body in accordance with its competence limits.

In order to carry out sustainability reporting in accordance with national legislation transposing the CSRD and the ESRS reporting standards, the following key steps have been completed:

- **Determining CSRD applicability** – identifying the scope at both Group and stakeholder level contributing to relevant information for sustainability reporting;
- **Conducting double materiality analysis** – identifying material sustainability topics from both the perspective of the bank’s impact on people or the environment and the risks and opportunities the bank is exposed to;
- **IRO Mapping** – identifying and assessing Impacts, Risks, and Opportunities in terms of materiality;
- **Identifying reporting requirements** – determining the material themes, sub-themes, and sub-sub-themes, and assigning data points in accordance with ESRS;
- **Preparing the sustainability statement** – compiling the required data points and consolidating them into the sustainability statement based on the identified reporting requirements.

The double materiality analysis was carried out by Ernst & Young with the involvement of the bank’s internal experts, and its results were validated at the governance level. The Sustainability Report was also approved by the Board of Directors, based on the recommendation of the Risk Management Committee, and audited by Deloitte in accordance with the applicable legal requirements.

7.1.2.3 Integration of Sustainability-Related Performance into Incentive Systems – GOV-3

The Remuneration Policy of Exim Banca Românească is based on the provisions of the bank's Strategy and business model and the Significant Risk Management Strategy, aligning with the long-term objectives, values, and interests of the bank.

The remuneration policy is also applicable to the executive and non-executive members of the governing body, namely the Board of Directors and the Management Committee.

The remuneration of the executive/non-executive members of the governing body is linked to quantitative and qualitative performance objectives and indicators, as defined in the mandate contracts signed with the majority shareholder (the Ministry of Finance).

The variable remuneration for the executive members of the Board of Directors is based on financial and non-financial performance indicators, which are negotiated and approved annually by the majority shareholder. The objectives undertaken through the bank's Sustainability Strategy by its governing bodies are aligned with the bank's Strategy and business model, so that by achieving these objectives, the alignment between the bank's remuneration practices, senior management interests, and sustainability goals is ensured. Currently, there is no direct correlation between variable remuneration for executive members of the Board of Directors and specific ESG performance indicators.

7.1.2.4 Statement on the Due Diligence Process – GOV-4

The due diligence process represents an essential component in evaluating the reporting boundaries of the value chain. The financial services sector has faced numerous challenges and risks over the years, and in order to remain profitable in the long term, these challenges require a strong culture of risk management and sustainability.

The bank undertakes various due diligence activities in relation to sustainability aspects.

Adherence to proper due diligence processes is particularly important for managing the risks associated with sustainability reporting, including regulatory compliance risks.

The overview below provides information about the sections of the sustainability report that include the main elements of the due diligence process, specifically the procedures performed or processes implemented to identify actual and potential negative impacts on the environment and people related to the bank's activities.

MAIN ELEMENTS OF THE DUE DILIGENCE PROCESS	SECTIONS IN THE SUSTAINABILITY STATEMENT
a) Integration of the due diligence process into governance, strategy and business model	General Information: Strategy, Sustainability Priorities, Governance
b) Collaboration with affected stakeholders at all key stages of the due diligence process	General Information: Stakeholder Engagement Internal Staff: Employee Engagement Consumers End Users: Customer engagement
c) Identification and assessment of negative impacts	General Information: Sustainability Activities with the Business Model, Impact Materiality Climate Change: Impact Assessment Internal Staff: Working Conditions - Engagement Survey Consumers and End Users: Complaints Management Framework Governance: Know Your Customer (KYC) process

d) Taking action to address these negative impacts	Climate Change: Lending Activities – Customer Engagement Internal Staff: Human Rights Policy Commitments; Diversity, Equity and Inclusion Policy Commitments; Employee Wellbeing; Equal Treatment and Opportunities Consumers and End Users: Access to Quality Information – Actions and Performance Consumers and End Users: Privacy – Actions and Performance Governance: Financial Crime – Actions and Performance
e) Monitoring the effectiveness of these efforts and communicating	Climate Change: Climate Goals and Progress Internal Staff: Working Conditions -Engagement Survey, Gender Pay Gap, Gender Diversity in Leadership Positions Consumers and End Users: Access to Quality Information – Actions and Performance Consumers and End Users: Privacy – Actions and Performance Governance: Compliance Training on Financial Crime

7.1.2.5 Risk Management and Internal Controls Related to Sustainability Reporting – GOV-5

Sustainability aspects and ESG risks are integrated into the bank’s internal processes, which in turn include specific provisions regarding the control, identification, monitoring, and reporting of material aspects.

The sustainability reporting process is based on a double materiality analysis that evaluates the impacts, risks, and opportunities identified at the bank level and determines the specific material topics at the level of topic, subtopic, and sub-subtopic.

The double materiality analysis is prepared in accordance with the ESRS, and based on the resulting material aspects, the specific data points relevant to the bank were determined using the data point list provided by EFRAG under the ESRS framework. The process was carried out in collaboration with external consultant Ernst & Young and was based on applicable standards and guidelines, ensuring completeness of the reported information. Additionally, the bank relies on internal data and information, ensuring their integrity through specific systems and procedures. In certain processes, the bank collects information across the value chain depending on its availability or uses proxies or internal estimates based on specific standards, professional judgment, or best practices.

Certain data collection and analysis processes related to sustainability reporting—particularly regarding the calculation of GAR and GHG emissions—are formalized through internal procedures approved by the competent bodies, thereby ensuring compliance with legal or regulatory requirements, including internal controls and templates for data collection and reporting to ensure timely information availability. The internal regulatory framework will be further extended through the development and implementation of reporting methodologies such as the EU Taxonomy.

Risk management is an integral part of all decision-making and business processes at Exim Banca Românească. The bank’s leadership and structures continuously evaluate the risks to which the activity may be exposed, which could affect the achievement of objectives, and take action in response to any changes in the operating environment.

7.1.3 Strategy

7.1.3.1 Strategy, Business Model and Value Chain – SBM-1

7.1.3.1.1 Key Elements of the Overall Strategy Related to Sustainability

For Exim Banca Românească, sustainability means managing the business in a responsible, efficient manner aligned with the European Union's sustainable development goals.

As part of its general business strategy, Exim Banca Românească is committed to financing the gradual transition to a sustainable, low-carbon economy, encouraging responsible behavior and increasing its positive impact on society.

Therefore, according to the objectives outlined in the Commercial Strategy and Business Plan 2024–2026, Exim Banca Românească has a specific strategic objective for sustainable development, which ensures both proper ESG risk management and the direction of financial flows toward the sustainable development of the economy, characterized by low greenhouse gas emissions and resilience to climate change, through the development of green products and the growth of the related lending portfolio.

In this context, through its Commercial Strategy and Business Plan 2024–2026, the bank has identified investment projects considered relevant for the development of sustainable business, specifically:

- Projects related to activities categorized as climate-targeted financing, such as: renewable energy, energy efficiency, waste and wastewater reduction, transport and special environmental financing, or technology investments;
- Projects in the field of circular economy.

To implement these projects for both the corporate and retail business lines, specific development directions connected to sustainability have been set, including:

- Development of products and solutions specific to sustainable lending;
- Development of a green/climate finance credit portfolio;
- Co-participation in significant projects related to sustainable finance (corporate).

Additionally, the financing of SMEs, particularly through the National Recovery and Resilience Plan (PNRR), represents another development direction aimed at supporting the transition to a sustainable economy.

The commercial strategy has been correlated with the bank's Sustainability Strategy, and the objective of increasing sustainable finance has been detailed into sub-objectives with deadlines included in the action plan. The objectives include:

- Implementation of sustainable lending principles for corporate clients, resulting in increased green financing and the development of a sustainable credit portfolio;
- Development of sustainable lending-specific products and solutions, a green/climate finance loan portfolio, as well as co-participation in important sustainable finance projects for corporate clients;
- Development of green/social products for retail clients;
- Issuance of green/social bonds;
- Support for public programs for company financing;
- Promotion of pro-environmental behavior through awareness campaigns targeting clients regarding climate and environmental risks, including efforts to support or accelerate transition plans;
- Inclusion of sustainability-related messaging in communication plans.

In 2025, the bank plans to develop the General Sustainable Finance Framework, a document that will set out the principles for classifying green/sustainable loans and establishing a unified understanding of sustainable financing, taking into account the LMA Guidelines, ICMA Principles, and the EU Taxonomy. This document will be used for both classifying and marking commercial transactions and preventing greenwashing during the identification of sustainable financing for corporate clients. For relevant corporate client segments, the bank will conduct in-depth ESG analyses to ensure proper ESG risk management. This General Sustainable Finance Framework does not apply to EximAsig's activity.

Corporate and retail clients will be offered customized ESG-integrated products and services. The green financing categories will mainly target: green buildings, eco-transportation, energy efficiency, and renewable energy.

The gradual implementation of taxonomy into products and processes is another strategic development linked to sustainability. Thus, in the context of limited available information, the bank has initially focused its efforts on identifying climate-eligible activities. As a next step, the bank intends to use taxonomy alignment in product and process design by:

- Expanding client interaction processes to improve data collection on taxonomy eligibility and alignment;
- Improving technological capabilities to fully capture relevant taxonomy data and to identify eligible and aligned activities more efficiently;
- Refining the product offering to include taxonomy-related priorities, such as the development of products supporting taxonomy-eligible/aligned activities;
- Enhancing data collection processes concerning the energy efficiency of financed residential real estate;
- Redesigning client questionnaires to better identify eligibility and alignment elements under the taxonomy.

7.1.3.1.2 Key Elements of the Business Model and Value Chain

The business model of the Exim Banca Românească Group comprises Exim Banca Românească and its Romanian-based subsidiary, the Insurance and Reinsurance Company EXIM Romania (EximAsig). The Group addresses retail and corporate banking activities through Exim Banca Românească and insurance activities through its subsidiary, EximAsig. The key elements of the business model and value chain presented below refer to banking-specific activities, namely those carried out by Exim Banca Românească.

The bank's business model reflects both its mission and vision, which are closely aligned with Romania's sustainable economic development, with respect for the environment. This development is to be achieved through sustainable business partnerships for social well-being and economic performance.

Bank's Vision – “Exim Banca Românească embraces innovation and development and, as a solid credit institution, aims to provide personalized financial solutions to clients, confirming its status as a preferred banking partner in Romania. Exim Banca Românească maximizes the use of its available resources and market position, focusing on stimulating clients' business potential and contributing to Romania's sustainable economic growth and the consolidation of the national banking system. As organizational performance is closely tied to the development of the community and social environment, Exim Banca Românească continues to actively participate in projects that support the creation of an educated and healthy society, with respect for the environment and sustainable development, building Romania's future together.”

Bank's Mission – “Exim Banca Românească's mission is to support prosperity in Romania by building sustainable partnerships for clients' social well-being and economic performance through accelerated financial intermediation.”

The Bank's **main business lines** have been developed along two principal directions: operations on its own behalf and in its own name (universal commercial banking) and operations under mandate (on behalf and for the account of the state). For the activity carried out by Exim Banca Românească **on behalf and for the account of the state (NCS)**, it has been considered that the Bank will continue performing activities on behalf and for the account of the state until the Investment and Development Bank (BID) becomes operational, and subsequently it will continue to manage the financial instruments issued on behalf and for the account of the state until their maturity. Operations **on behalf and for the account of the state** in the form of Export Credit Agency will be carried out for an indefinite period, including after the operationalization of the National Development Bank. For the activity carried out as a **universal commercial bank**, Exim Banca Românească addresses the needs of both individual and corporate clients.

The Bank aims to lend responsibly, to encourage saving and sustainable financing in general, and to support all its clients with suitable and durable advice and financial solutions, whether they are retail, corporate, or public sector clients. The activities carried out by Exim Banca Românească as a **universal commercial bank** are grouped into 3 main business lines: Corporate, Retail, and Treasury. The distribution channels used by the Bank in its own-name and own-account operations are:

- Territorial units (Branches, Business Centres), the Corporate Large Clients and Project Finance Division for large corporations, and the Internal and International Financial Relations Directorate for financial institutions.
- Digital channels (Internet & Mobile Banking, Onboarding, Contact Center).
- ATM/MFM network.
- Credit intermediaries for individuals.

In the activity carried out on behalf and for the account of the state, indirect channels are used, namely credit institutions, non-banking financial institutions engaged in lending/financial leasing, multilateral development banks, factoring companies, etc.

The national territorial network of Exim Banca Românească comprises 108 territorial units (82 retail branches and 26 Business Centres), with no anticipated expansion into international markets through the opening of foreign branches or representative offices. The range of operations for each type of branch is as follows:

- Retail branches mainly serve the retail business line, but also the corporate business line for operations involving saving, cash and non-cash transactions, and the use of current account packages (including Internet Banking).
- Business Centres are primarily responsible for selling all products addressed to clients from the legal entities segment with a turnover exceeding RON 2 million and represent the main interaction points between these clients and the Bank.

The client service model described above is primarily based on customer requirements, which have been translated into a model as close as possible to customer needs, both through the development of physical distribution channels (network/intermediaries/ATM-POS) and digital ones. At the same time, the specific requirements of the shareholders have also been considered by designing an efficient and profitable business model.

Thus, **the product distribution model** described above aims to **add value for customers** both through a **balanced distribution of branches and business centres** and through the **development of digital distribution channels**.

Therefore, it can be observed that the geographic footprint of the distribution network is balanced, with the Bank being present in the main counties with intense economic activity. This facilitates both the financing of local business projects and the raising of resources from the population in a diversified manner.



REGION	Number of retail employees	Number of corporate employees
BUCHAREST-ILFOV	97	13
CENTRAL	49	21
NORTH-EAST	44	13
NORTH-WEST	48	18
SOUTH-EAST	43	11
SOUTH	59	8
SOUTH-WEST	39	9
WEST	32	13
DCM	NA	7
DRFII	NA	5

The digital service of retail clients, complemented by specific **sustainable products**, also represents an important component in the value chain that **adds value for both clients and shareholders**. In the context of the digitalization process, emphasis will be placed on the development of services related to payments and transactions, by offering new functionalities to clients through the ATM network and increasing payment accessibility at POS terminals. Thus, the expansion and modernization of the ATM network will focus on the continued installation of latest-generation multifunctional machines in high-potential areas, which will offer customers new services and functionalities, including: receiving money via Western Union, cash deposits into other RON/foreign currency accounts, foreign exchange operations (contact/contactless), and bill payments to approved providers.

The service of corporate clients is focused on serving them through both Branches (for certain operations), and Business Centers, the Corporate Division for Large Clients and Project Finance, and the Directorate for Internal and International Financial Relations. The operational flow in Branches also considers servicing legal entity clients for certain types of operations such as: collecting documents for client/account opening, collections/payments, receiving payment instruments, card sales/salary agreements.

By implementing this operational model in the value chain, value was intended to be added for clients, so that corporate clients benefit from both geographic proximity (access to both Branches and Business Centers) and fast service tailored to their needs.

Last but not least, the value chain highlights **one of the bank's strengths** that adds value for **both shareholders and clients: the sale of complex products tailored to client needs**.

The current client structure reflecting the universal banking commitment:

Corporate	No. of active clients
SBB	1.558
SME's	1.827
LARGE	432
LPA	78
IF	127
Others	114

Retail	No. of active clients
Individuals and equivalents	99.570
Freelancers (PFA)	414
Microenterprises	9.128

Interest income at consolidated level as of 31.12.2024 by economic sector*

CAEN Section(thousand RON)	Bank	Group
A. AGRICULTURE, FORESTRY AND FISHING	66.624	66.624
B. MINING INDUSTRY	11.377	11.377
C. MANUFACTURING INDUSTRY	183.882	183.882
D. PRODUCTION AND SUPPLY OF ELECTRICITY AND HEAT, GAS, HOT WATER AND AIR CONDITIONING	40.691	40.691
E. WATER SUPPLY; SANITATION, WASTE MANAGEMENT, DECONTAMINATION	44.222	44.222
F. CONSTRUCTION	100.123	100.123
G. WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	136.011	136.011
H. TRANSPORTATION AND STORAGE	45.023	45.023
I. HOTELS AND RESTAURANTS	12.988	12.988
J. INFORMATION AND COMMUNICATIONS	6.541	6.541
K. FINANCIAL INTERMEDIATION AND INSURANCE	292.733	293.322
L. REAL ESTATE TRANSACTIONS	13.167	13.167
M. PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	27.356	27.356
N. ADMINISTRATIVE SERVICES AND SUPPORT ACTIVITIES	10.474	10.474
O. PUBLIC ADMINISTRATION AND DEFENCE; PUBLIC SOCIAL INSURANCE	355.215	356.529
P. EDUCATION	84	84
Q. HEALTH AND SOCIAL ASSISTANCE	3.091	3.091
R. ENTERTAINMENT, CULTURAL AND RECREATIONAL ACTIVITIES	608	608
S. OTHER SERVICE ACTIVITIES	262	262
U. ACTIVITIES OF EXTRATERRITORIAL ORGANIZATIONS AND BODIES	0	0
INDIVIDUALS	253.202	253.202
TOTAL	1.603.673	1.605.576

*According to Financial Statements – Note 3

Interest income from loans by client type as of 31.12.2024**

Interest income from loans	Value (thousand RON)
Loans granted to individuals	253.200
Loans granted to legal entities	713.804
Loans granted to public authorities	150.052
TOTAL	1.117.056

**According to Financial Statements – Note 17 d)

Gross written premium income by type of insurance product for Exim Asig as of 31.12.2024.

Insurance products	GWP (thousands RON)
Personal accident insurance	-12
Third party liability insurance	7.111
Property insurance	6.650
Guarantee insurance	47.417
Construction and assembly insurance	6.691
Comprehensive insurance for financial institutions	1.288
TOTAL	69.145

The Bank's product and service offering is presented in detail in the Commercial Strategy and Business Plan 2024 - 2026.

7.1.3.1.3 How Stakeholder Interests and Perspectives Are Considered in the Strategy and Business Model

The Bank has maintained constant interaction with stakeholders to appropriately identify impacts, risks, and opportunities (IRO). As a result of this interaction and the outcomes of the double materiality analysis (DMA) and related IROs, the Bank continually shapes its business strategy, products, distribution channels, and development commitments included in its business plans.

Purpose of stakeholder engagement

Stakeholder opinions are taken into account in the company's strategy and business model. Stakeholder engagement enables the Bank to:

- Gather valuable insights and feedback on topics such as sustainability, regulatory compliance, and corporate performance. This helps the company understand stakeholder expectations and concerns, supporting decision-making and strategic development.
- Identify and address material issues by considering critical concerns.
- Support sustainability objectives by promoting them: stakeholder exchanges help raise awareness and garner broader support for achieving these goals.
- Improve transparency and accountability: stakeholder engagement promotes transparency and accountability by providing stakeholders with information about the Bank's activities, performance, and future plans.
- Encourage collaboration and partnerships: this enables the Bank to work with stakeholders to address and resolve common challenges, share best practices, and achieve mutual benefits.

Considering the results of stakeholder engagement

The Bank values the information and feedback gathered through stakeholder engagement and integrates these results into decision-making processes, strategy, and business model wherever possible. Main ways in which these results are considered include:

- Incorporating feedback;
- Information initiatives;
- Supporting decision-making: this approach ensures that decisions are well-informed and consider the interests of relevant stakeholders.

By integrating the outcomes of stakeholder engagement into its processes, the Bank ensures that stakeholder interests and views are considered, supporting the company's long-term sustainability and success.

Inclusion of stakeholders in the materiality analysis

The Bank actively engages with a diverse range of stakeholders, including shareholders, customers, employees, regulators, and business partners. This engagement takes place through meetings, bilateral discussions, or conferences. Selection of material topics is guided by EU regulatory requirements and the European Sustainability Reporting Standards (ESRS).

Regarding **shareholder interests**, the commercial strategy aims to **set clear sustainability objectives** and increase transparency through the **reporting of strategic sustainability objectives**. Thus, the Annual Board of Directors' Report included the non-financial statement and KPIs in accordance with the taxonomy requirements of EU Regulation 852/2020 Article 8 and Regulation 1278/2021.

To properly manage ESG risks, which relate to the interests of both clients and shareholders, the Bank has aimed to integrate ESG factors and associated risks (climate and environmental risks) into its risk management strategy and credit policy. ESG risks are thus classified into three categories (low, medium, high risk), and for relevant clients/exposures an ESG Questionnaire is required, with risk mitigation measures for clients with high ESG risk. During 2025–2026, the Bank will focus on assessing/measuring ESG risks and developing environmental factor analysis methodologies to enable effective management of these risks.

Regarding **access to sustainable financing**, the Bank has set a strategic objective of implementing sustainable lending principles for corporate and retail clients, with the goal of developing a sustainable loan portfolio. The development of sustainable lending-specific products and solutions in collaboration with specialized consultants, green/climate loan portfolios, and co-participation in major sustainable financing projects for legal entities as well as for retail businesses (e.g. green mortgage loans) are action directions included in the Bank's strategy, with benefits for clients focused on sustainable development.

Digitalization as a strategic objective serving the **interests of both customers and shareholders** has transformed access to financial services, enabling mobile and online applications, giving customers the ability to perform transactions quickly and efficiently.

Regarding the strategy to support green initiatives for corporate and retail clients, an aspect that serves the interests of both customers and shareholders, emphasis has been placed on supporting the transition plans of clients demonstrating a commitment to reducing their own environmental impact, whether through carbon neutrality initiatives, responsible supply chain management, or other environmentally friendly practices. Therefore, the Bank has engaged in financing green projects, especially in the field of green energy (renewable energy projects, green buildings, recycling projects, cogeneration projects).

Future plans and strategies

In 2025, the Bank intends to implement **sustainable lending principles** for corporate clients as well as a sustainable financing classification methodology. This methodology will enable the proper identification of projects from various macro sectors that enhance positive environmental impact and reduce negative impact, while helping businesses adapt to the effects of climate change.

In 2025, the development of sustainable lending-specific products and solutions, the green/climate loan portfolio, and co-participation in major sustainable financing projects for corporate clients as well as retail businesses (e.g. green mortgage loans, etc.) will be a natural consequence of the implementation mentioned above.

2024 was the first year in which the Bank calculated CO₂ emissions both at the level of the financed portfolio and internally/operationally. Beginning in 2025, the Bank will closely monitor financed emissions in order to make decisions that contribute to their reduction. At the level of its own operations, measures are being implemented to reduce the carbon footprint generated by internal/operational activities (Scope 1 & 2 emissions).

In parallel, through communication activities aimed at shaping the attitudes of colleagues, clients, and society regarding sustainability challenges, the integration of environmental, social, and governance (ESG) aspects into financial decision-making will be encouraged. Thus, both employee interest in acting sustainably within the Bank and client interest through advisory and support for sustainable business development will be promoted.

In the corporate area, discussions on sustainability have been initiated with clients, ESG due diligence questionnaires have been applied, and/or sustainability reports have been requested. There is increasing interest from corporate clients in sustainable financial products such as loans and investments that support environmentally friendly projects and initiatives.

The Commercial Strategy and the Sustainability Strategy approved by the Bank's Board of Directors aim to establish both **clear sustainability objectives** and to increase transparency in **reporting on the achievement of sustainability-related strategic objectives**. The outcome of the materiality analysis was also presented to the Board of Directors.

7.1.3.1.4 Result of the Assessment of Significant Impacts, Risks, and Opportunities, Including How They Contribute to the Strategy and Business Model

The Bank understands environmental, social, and governance (ESG) risks as risks that need to be integrated into risk management strategies and policies. As such, considerations regarding ESG risk factors will be integrated into the management of risk types within the Bank's existing risk management framework. An in-depth analysis of ESG factors for relevant clients/financing will be a necessary step to be carried out by the Bank in the short term (2025–2026).

The Bank faces specific challenges in its efforts to achieve its sustainability vision. These arise mainly from the economic, social, and environmental impacts of its commercial activities. In the materiality analysis, the Bank addresses the sustainability topics identified as material and which reflect stakeholder expectations.

In evaluating impacts, risks, and opportunities, the Bank considered its activity across the entire value chain (upstream & own operations, and downstream – clients) and across multiple time horizons (short-, medium-, and long-term). The materiality of a sustainability topic was determined both by the Bank's impact on the environment and society (inside-out perspective) and by external sustainability-related risks and opportunities that affect the Bank (outside-in perspective).

A sustainability topic can be material from both perspectives. When a topic is material from an impact perspective, the same topic may or may not generate material risks and/or opportunities. Thus, from the 10 ESRS thematic standards, the following were validated as significant:

- ESRS E1 – Climate Change
- ESRS S1 – Own Workforce
- ESRS S4 – Consumers and End-users
- ESRS G1 – Business Conduct

Out of the 37 subtopics corresponding to the 10 ESRS standards, the following were found to be significant:

- 9 subtopics from the impact perspective
- 9 subtopics from the financial perspective

There are opportunities for integrating the concept of sustainability at the Bank level, which are being considered across several development directions, such as:

- Achieving the Bank's strategic objectives to support national programs for sustainable development and climate change resilience;
- Identifying new business opportunities and increasing sales in new customer segments.

The aggregated result by ESRS theme shows that E1, S1, S4, and G1 are the most important sustainability domains for the Group.

The material impacts, risks, and opportunities identified through the double materiality process are presented and described below, including their type, position in the value chain, and expected time horizon.

E1 – Climate Change

Material IROs	ESRS sub-/sub-sub-topic	IRO Type	Value Chain			Time Horizon		
			Upstream	Own operations	Downstream	Short	Medium	Long
The bank contributes to greenhouse gas emissions through its current operations, especially via the use of fossil-fuel-powered vehicles and the operation of energy-intensive assets such as administrative buildings and data centers.	Climate change mitigation	Current negative impact		X				X
The bank's loan portfolio includes exposures in high-carbon-emission sectors such as manufacturing, automotive, and construction. Additionally, financing properties or vehicles dependent on fossil fuels increases the institution's indirect carbon footprint.		Current negative impact			X			X
By financing companies that prioritize the transition to a low-carbon economy through reuse and recycling of products, the bank plays an important role in reducing greenhouse gas emissions and mitigating their effect on climate change.		Potential positive income			X		X	X
The bank aims to reduce its negative environmental impact by transitioning to an electric vehicle fleet and accelerating digital transformation to reduce resource consumption.		Potential positive income	X	X			X	X
The bank has identified the following material risks: * Credit and Market Risks (increased exposure to credit risk for clients affected by carbon tax regulations, potential depreciation of collateral, and emergence of economically stranded assets in the context of the energy transition; energy price volatility may affect the profitability of energy-intensive sectors) * Reputational Risks (potential negative impact on the bank's image in case of financing fossil fuel sector projects)		Risk					X	X
Setting insurance premium rates that are not aligned with climate risks for the insurance products offered by EximAsig, a subsidiary of the bank, could lead to financial losses.	Climate change mitigation	Risk						X
The energy mix used in the bank's operations (electricity, fuel, and heating) currently generates a negative impact through associated CO2 emissions. By implementing energy efficiency initiatives, the bank can achieve a significant reduction in its operational carbon footprint (Scope 1 & 2).	Energy	Current negative impact		X		X	X	X
Through the implementation of energy efficiency initiatives, the bank can achieve a significant reduction in its operational carbon footprint (Scope 1 & 2).		Current positive impact		X		X	X	X

S1 – Own workforce

Material IROs	ESRS sub- /sub-sub- topic	IRO Type	Value Chain			Time Horizon		
			Upstream	Own operations	Downstream	Short	Medium	Long
Job security is a fundamental aspect of employment that benefits both employees and employers. When employees feel secure in their roles, they are more likely to be engaged, productive, and loyal to the company. A secure workforce also contributes to a stable financial sector, which is essential for trust and economic growth.	Working conditions	Current positive impact				X		X
				X				
	Safe jobs			X				
	Health and safety							
Implementing a fair compensation policy is a fundamental pillar in ensuring quality standards of life for personnel. This positive impact is directly reflected in the financial stability of employees and contributes to strengthening the bank's position as a responsible employer in the labor market.	Adequate wages	Current positive impact		X		X		
The institution actively promotes the right to association as a core element of ethical labor practices, building an organizational environment based on collaboration and mutual respect.	Freedom of association, works councils and the rights to information, consultation, and participation of workers	Current positive impact		X			X	X
Collective labor agreements serve as an essential tool in protecting and promoting the professional interests of employees. The process of collective bargaining facilitates the continuous optimization of compensation packages and working conditions, strengthening the constructive relationship between management and employees.	Collective bargaining	Current positive impact		X			X	
A strategic focus on human capital development produces a consistently positive impact by building a highly qualified professional body. Sustained investments in training and professional development programs facilitate the advancement of employees both individually and professionally, contributing to the institution's operational excellence.	Equal treatment and opportunities for all	Current positive impact		X			X	
	Training and professional development							
Implementing diversity principles generates a positive impact by cultivating a sustainable and inclusive organizational culture. This approach enhances employee well-being and satisfaction, leading to a more productive work environment.	Diversity	Current positive impact		X			X	X

In today's context of accelerated digitalization, the bank has identified significant risks related to the protection of employees' personal data. A potential breach of these data's security could lead to serious legal consequences, as a result of non-compliance with current data protection regulations. The bank pays constant attention to implementing robust information security measures.	Other labor-related aspects	Risk		X	X	X
	Employee data privacy					

S4 – Consumers and End Users

Material IROs	ESRS sub-/sub-sub-topic	IRO Type	Value Chain			Time Horizon		
			Upstream	Own operations	Downstream	Short	Medium	Long
The bank acknowledges the potential negative impact of security breaches and cyberattacks on customer data confidentiality. In this context, the institution has made a strong commitment to adopting cutting-edge technologies in data security. Without adequate GDPR processes and procedures, a bank may face increased risks of data breaches and misuse, which can erode trust in digital services and potentially harm individuals' privacy. Lack of accountability and transparency in the handling of personal data can lead to societal distrust and may have legal and reputational consequences for a bank. Ensuring the confidentiality of personal information and account holders' data is a core responsibility of the financial industry. Poor performance in this area may lead to revenue losses due to declining consumer trust and high employee turnover.	Information-related impacts for consumers and/or end users	Potential negative impact		X		X		X
	Privacy	Risk				X	X	
The bank generates a potential positive impact by ensuring clients have access to complete and accurate information. This approach facilitates consumers' decision-making process, enabling them to make well-informed financial decisions.	Access to (quality) information	Potential positive impact		X		X		
The institution facilitates universal access to a wide range of financial products and services tailored to different population segments. This approach helps reduce barriers to accessing the banking system.	Social inclusion of consumers and/or end users Access at products and services	Current positive impact		X			X	

G1 – Business Conduct

Material IROs	ESRS sub- /sub-sub-topic	IRO Type	Value Chain			Time Horizon		
			Upstream	Own operations	Downstream	Short	Medium	Upstream
The bank generates a current positive impact through the implementation of a robust whistleblower protection system. This foundational system fosters an organizational environment characterized by transparency and accountability, providing employees with the necessary mechanisms to report misconduct without fear of retaliation.	Whistleblower protection	Current positive impact		x		x	x	
The evaluation of suppliers and collaborators against predefined social and environmental standards can lead to significant improvements in social well-being and tangible environmental benefits. The consistent application of fair payment procedures for suppliers and collaborators contributes to maintaining ethical and transparent financial practices throughout the value chain.	Supplier relationship management, including payment practices	Potential positive impact		x		x	x	
The bank demonstrates a current positive impact in combating corruption by implementing rigorous anti-bribery and anti-corruption measures across all its operations.	Corruption and bribery – Prevention and detection, including training	Current positive impact		x		x	x	

The bank has identified three main strategic opportunities in the environmental domain:

Adaptation to Climate Change

The institution can leverage financial opportunities by developing its investment portfolio in entities that offer climate change adaptation solutions, with a focus on financing projects that incorporate climate resilience features.

Climate Change Mitigation

Financing activities and entities that support decarbonization represents a significant financial opportunity. This strategic direction enables the bank to contribute to the transition towards a sustainable economy.

Energy

The development of the financing portfolio for renewable energy projects represents a major growth opportunity, aligned with global energy transition trends.

In relation to its own workforce, the bank can develop competitive advantages by:

- Strengthening its position as a safe employer, leading to increased loyalty and lower recruitment costs;
- Implementing competitive salary packages to attract and retain talent;
- Promoting work-life balance, with direct impact on productivity;
- Proactively addressing pay inequalities to create a fair environment;
- Investing in continuous employee training to enhance skills and strengthen loyalty;
- Maintaining a safe and harassment-free work environment, contributing to employee mental health and productivity.

The bank can also leverage:

- Strengthening client relationships through advanced data protection and robust IT systems;
- Facilitating access to high-quality information about products and services;
- Developing emerging financing models for underserved markets;
- Adopting ethical marketing practices to strengthen its reputation.

Additionally, developing a positive corporate culture represents an opportunity to strengthen the competitive position in the market and improve institutional reputation.

7.1.3.2 Interests and Viewpoints of Stakeholders – SBM-2

Exim Banca Românească has identified the main internal and external stakeholders involved for consultation and incorporation of their opinions in the materiality assessment process, in order to gain further insights into the associated Impacts, Risks, and Opportunities (IRO).

Exim Banca Românească stakeholder groups				
Given the specific nature of financial institutions, the bank's business model and external interactions, as well as the need to report sustainability aspects in accordance with the ESRS standards, the following stakeholders have been identified as relevant users of the sustainability statement or as affected stakeholders:				
Stakeholder	Type of Stakeholder	Consultation Method	Frequency	ESRS
Exim Banca Românească employees	Affected stakeholder	Employee satisfaction analysis HR Department maintains ongoing contact with employees through all specific HR processes, and ensuring an adequate level of employee satisfaction regarding their work, the work environment, team and interdepartmental communication, and other relevant aspects is a continuous concern of both the HR Department and management. Ongoing dialogue regarding performance and employee development Meetings between employees and HR representatives Meetings with employee representatives are held periodically.	Permanent Ongoing Ongoing Periodic	E1, S1, G1
Shareholders of Exim Banca Românească	Affected stakeholder	Setting clear sustainable objectives as well as increasing transparency through reporting on strategic sustainability objectives. Documents provided: Activity Report, Sustainability Report etc.	Annual	S2
Clients – individuals and legal entities	Affected stakeholder	Discussions initiated with clients regarding sustainability aspects, ESG due diligence questionnaires, requests for sustainability reports.	Ongoing	S4, G1, S2
Regulatory and/or public authorities (local and central)	Relevant users of the sustainability statement, also affected stakeholder	Continuous contact and dialogue directly or through the Romanian Banking Association (periodic meetings, events, seminars, etc.)	Ongoing	E1, E2, E3, E4, E5, S1, S2, S3, S4, G1
Suppliers	Affected stakeholder	Specific meetings Discussions with bank management	Ongoing	G1, S2

Stakeholder engagement was conducted through various major communication channels. These channels were tailored to the specific needs of each stakeholder category. For the purpose of the double materiality assessment, relevant representatives from each stakeholder category were consulted and/or internal documentation related to feedback collected by Exim Banca Românească during day-to-day operations was reviewed (employee surveys, customer surveys, supervisory reports, complaint reports from clients/employees, minutes of meetings with employee representatives, etc.).

The consultation method by stakeholder category, particularly regarding internal stakeholder involvement, was considered appropriate because it allows for communication channels and consultation methodologies to be adapted to the needs and specificity of each category. This ensured more accurate, formal, and relevant feedback collection, thereby facilitating a better understanding and addressing of each stakeholder's concerns.

Regarding the timing of the consultation, feedback from the previous year may still be relevant for the current year's assessment, as many of the issues and concerns identified remain valid in the medium and long term. Additionally, previously collected feedback can provide a basis for comparison to assess progress and changes in stakeholder perceptions and needs. This ensures continuity and coherence in the stakeholder engagement and evaluation process.

7.1.3.3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model – SBM-3

7.1.3.3.1 Description of Material Impacts, Risks and Opportunities

Climate change has proven to be material both from the perspective of impact and from that of risks and opportunities, considering the current dependence of the portfolio on fossil fuels and the potential for weather events to disrupt social structures and key industries.

Unstable energy prices due to climate change or other socio-economic factors (conflicts, regulations) have a significant impact as they can lead to reduced profitability of companies operating in energy-intensive sectors (wholesale, manufacturing), generating credit default risks with consequences on the repayment of loans contracted from the bank.

7.1.3.3.2 Current and Anticipated Effects of the Material IROs

Climate change

The bank contributes to maintaining economic stability and governance frameworks that underpin social welfare, having a positive impact on reducing vulnerabilities to the effects of climate change. The bank can also contribute to climate change adaptation solutions provided by local government authorities, through financing granted to entities in the public administration sector.

The sectoral structure of the bank's corporate exposure highlights the current risks and opportunities related to climate change:

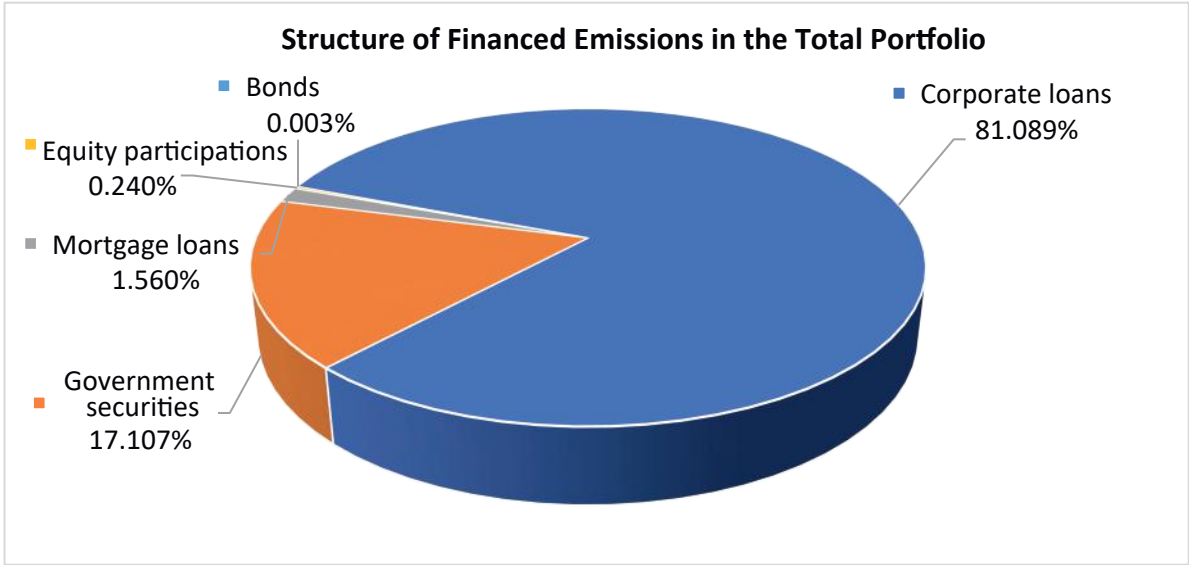
NACE (CAEN) Sector	Value (thousand RON)	Share (%)
A. AGRICULTURE, FORESTRY AND FISHING	801.852	7%
B. MINING AND QUARRYING	148.214	1%
C. MANUFACTURING INDUSTRY	2.589.146	23%
D. ELECTRICITY, GAS, STEAM AND AIR CONDITIONING SUPPLY	314.278	3%
E. WATER SUPPLY; SEWERAGE, WASTE MANAGEMENT AND REMEDIATION ACTIVITIES	491.172	4%
F. CONSTRUCTION	1.232.957	11%
G. WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	1.726.039	15%
H. TRANSPORTATION AND STORAGE	570.646	5%
I. ACCOMMODATION AND FOOD. SERVICE ACTIVITIES	169.296	2%
J. INFORMATION AND COMMUNICATION	76.491	1%
K. FINANCIAL AND INSURANCE ACTIVITIES	236.499	2%
L. REAL ESTATE ACTIVITIES	210.288	2%
M. PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	420.686	4%
N. ADMINISTRATIVE AND SUPPORT SERVICE ACTIVITIES	177.117	2%
O. PUBLIC ADMINISTRATION AND DEFENCE; COMPULSORY SOCIAL SECURITY	2.008.407	18%
P. EDUCATION	582	0%
Q. HUMAN HEALTH AND SOCIAL WORK ACTIVITIES	35.897	0%
R. ARTS, ENTERTAINMENT AND RECREATION	7.600	0%
S. OTHER SERVICE ACTIVITIES	3.370	0%
U. ACTIVITIES OF EXTRATERRITORIAL ORGANIZATIONS AND BODIES	0	0%
TOTAL GROSS LOANS	11.220.537	100%

Thus, Exim Banca Românească's financial commitments in the subsectors "Construction" and "General Public Administration Activities" have a visibly negative impact on climate change adaptation. In the construction sector, unsustainable practices can lead to soil degradation, ecosystem disruption, and the depletion of natural resources, which in turn increases the risk of natural disasters by compromising the land's ability to manage water.

Through the financing of public administration activities, the bank indirectly supports the governance frameworks essential to societal stability, but may also contribute to the implementation of policies that do not prioritize climate adaptation, thereby endangering efforts to protect local communities from the increasingly severe effects of climate change.

Financed emissions, meaning greenhouse gas emissions associated with the loans and investments provided by the bank, represent a significant aspect of the bank’s environmental impact. In 2024, financed greenhouse gas emissions were calculated for the first time. The applied methodology is based on the “PCAF Standard”—the most widely used standard compatible with the GHG Protocol for calculating financed emissions. This was an important step in identifying the sectors where the bank focuses its efforts to mitigate the indirect negative impact of its financing on the environment. Understanding and managing these emissions is an integral part of the bank’s commitment to promoting a low-carbon economy and sustainable practices across all sectors. The establishment of KPI objectives regarding CO2 emissions at the level of the financed portfolio is a medium-term commitment (2026–2027).

Current CO2 emissions structure:



Proactive adaptation to climate change represents a strategic opportunity for the bank to leverage the transition toward a low-carbon economy. Through investments in resilient infrastructure, diversification of renewable energy sources, and the creation of innovative products and services tailored to the physical and transitional risks of climate change, the company can achieve cost savings, foster innovation, and gain a competitive edge in an increasingly eco-conscious market. The bank can explore financial opportunities by investing in businesses that provide climate adaptation solutions and by financing projects or activities that incorporate climate resilience features, thereby strengthening its position as a leader in sustainable finance.

The bank’s financial exposure to high carbon-emitting entities can have significant negative environmental impacts, contributing to climate change. Financial support for sectors such as retail fuel distribution, wholesale trade, manufacturing, construction, and public administration amplifies greenhouse gas emissions due to their reliance on carbon-intensive processes and materials.

Furthermore, by providing loans for energy-inefficient buildings and fossil fuel-dependent vehicles, the bank may exacerbate the effects of climate change and global warming. These practices contribute to increasing the bank’s carbon footprint and have harmful effects on the environment and public health, potentially hindering climate mitigation efforts and affecting the bank’s reputation in the context of sustainable finance regulations.

For Exim Banca Românească, numerous financial opportunities arise from potentially (or currently) financing activities or entities that support decarbonization and the transition toward a more sustainable economy. Examples include financing new carbon capture or storage projects or supporting entities in the construction sector that develop infrastructure for electric vehicle charging, or financing auto manufacturers to encourage resource-efficient design.

Financing sustainable projects presents a major opportunity, with the potential to generate financial gains and increase market share. Given the growing focus on low-carbon technologies, this opportunity is highly likely to materialize.

Financing renewable energy projects can represent a portfolio opportunity for the bank, enabling the production of CO₂-neutral energy.

In conclusion, Exim Banca Românească faces relevant risks due to its exposure to the Construction, Wholesale Trade, and Manufacturing industries, which are subject to strict air pollution regulations. Companies in the bank's portfolio from these sectors may face significant operational and compliance costs, capital expenditures for emissions control, and potential regulatory penalties for emitting hazardous air pollutants. These risks are intensified by public health concerns, especially in areas near communities, where local environmental impacts may trigger tighter regulatory scrutiny and legal challenges. Consequently, the bank's financial performance and reputation could be negatively affected by the costs and liabilities associated with managing air pollution risks in these industries.

However, Exim Banca Românească may also find financial opportunities in companies developing innovative solutions to minimize or remediate air pollution in their production processes. For instance, technological innovations and continuous improvements in steel manufacturing processes have significantly reduced air pollutants in the steel industry.

Business Opportunities Identified in 2024

The Bank diversified its product portfolio for companies and launched the Mastercard Business Premium card, a tool that enhances the payment experience by offering some of the lowest monthly administration fees on the market along with premium category advantages, benefits, and rewards. The Business Premium card is made from recyclable material as part of the Bank's strategy to offer secure and sustainable banking products that support the transition to a green economy.

The Bank made available a ceiling of 50 million euros for SMEs and mid-cap companies to finance investment projects on advantageous terms, following a financing agreement signed with the European Investment Bank. Through the eligibility criteria imposed (selection of sustainable and environmentally friendly activities), the Bank encourages the sustainable development of its partner companies.

In 2024, the Bank continued to grant loans under the IMM PLUS program, facilitating SMEs and mid-cap enterprises' access to financing under special conditions for ensuring liquidity for current activities or investments. The CONSTRUCT PLUS component of this program aims to support financing needs for improving energy efficiency, making investments in green energy, and aligning with environmental objectives implemented by SMEs and mid-caps in the construction sector, including startups.

The Bank and Damen Galați Shipyard, one of the most important players in the Romanian naval industry, concluded a financing agreement worth 25 million euros aimed at implementing the company's investment program focused on expanding and equipping ship assembly facilities. The company's major project this year was the completion and delivery of a 179-meter military support vessel for the Royal Netherlands Navy. Key ongoing production projects include the construction of a multifunctional ship for the Portuguese Navy and the delivery of four fully electric ferries for the province of British Columbia, Canada, as part of the company's commitment to becoming a sustainable provider of maritime solutions.

Opportunities and Risks in Own Operations

The Bank's continued use of fossil-fuel-powered vehicles and operation of high-energy-consuming physical assets, including buildings and data centers, results in CO₂ emissions. The company's transition from fossil-fuel vehicles to electric vehicles is underway. Additionally, other positive impacts include the greening of the buildings where Exim operates, which will significantly reduce Scope 1 emissions from the Bank's facilities. Digital transformation (such as digital platforms) will also help the Bank's assets and operations adapt to climate change.

The energy mix (electricity, fuel, and heating) used by Exim Banca Românească in its own operations generates CO₂ emissions. By implementing various energy consumption reduction initiatives on its premises, the Bank can reduce CO₂ emissions.

Own Workforce

Job security is important to the Bank because it benefits both employees and the employer. When employees feel secure in their roles, they are more likely to be engaged, productive, and loyal. Offering decent wages to employees is also fundamental to ensuring a good quality of life. Fair compensation supports employees' household economic well-being.

Collective agreements implemented serve as a vital tool for employees in protecting their rights and interests. Through collective bargaining, the Bank's employees can obtain better wages, benefits, and working conditions. These agreements contribute to a fair workplace and can enhance the Bank's status as a socially responsible employer.

Additionally, through comprehensive health and safety procedures, the Bank prevents workplace accidents and mitigates risks. These policies support the well-being of both employees and clients, contributing to a safe and healthy work environment.

The Bank's investment in training and development measures has enhanced employees' skills, contributing to their personal and professional growth. The focus on human capital development is also important for promoting a skilled and efficient workforce.

Adopting diversity represents a step by the Bank to promote a positive and supportive organizational culture that improves employees' well-being and job satisfaction.

In conclusion, in 2024 the Bank continued to position itself as a safe employer. By supporting a healthy work-life balance for employees, the Bank promoted a working environment that contributes to employees' well-being and productivity, thereby supporting the Bank's financial performance.

Consumers and End Users

Data breaches or misuse, as well as cyberattacks, can negatively affect consumers by leaking personal or financial data, which can have serious effects and erode trust in financial and/or digital services. Therefore, the Bank considers that prioritizing consumer data protection and ensuring transparent communication builds trust and loyalty among the Bank's clients. Robust information security policies ensure a high level of protection for personal data and help prevent fraud and cyberattacks.

The Bank has a positive impact by providing clients with high-quality information that enables them to make informed financial decisions. This commitment to transparency enhances financial education, builds trust in the Bank as a financial institution, and contributes to overall financial stability.

The Bank has a positive impact by facilitating universal access to financial products and services. This approach promotes financial inclusion, increases economic opportunities for all individuals, reduces income inequality, and stimulates sustainable economic growth.

Emerging financing models and technologies offer opportunities to provide products and services in previously underserved markets and to generate additional revenue streams. There may be a growing number of opportunities to expand credit and financial services to low-income populations and small businesses while avoiding irresponsible lending practices. The Bank thus has an opportunity to cultivate a reputation for integrity and customer orientation by adopting ethical marketing practices.

Proper evaluation of suppliers and partners according to social and environmental standards represents another opportunity that can lead to improved societal well-being and environmental benefits. Applying clear codes of conduct and consistent payment procedures for suppliers and partners will generate and maintain ethical and transparent financial practices.

Business Conduct

In its operations, Exim Banca Românească has a positive impact in fighting corruption by implementing strong anti-bribery and anti-corruption measures. These measures enhance the Bank's ethical framework and ensure compliance with regulations, promoting a culture of integrity and transparency.

A positive corporate culture strengthens the Bank's reputation, attracts top talent, stimulates innovation and creativity, and thus reinforces the Bank's market position.

7.1.3.3.3 Current Financial Effects of Significant Risks and Opportunities

Exim Banca Românească may face increased credit risk that could arise in connection with financing clients affected by increasingly strict carbon taxes, fuel efficiency regulations, and technological changes. These risks are also associated with the depreciation of collateral, which could lead to impaired assets. Reputational risks may arise from financing fossil fuel projects or other hard-to-abate industries financed by the bank (such as the construction sector).

Unstable energy prices due to climate change or other socio-economic factors (conflicts, regulations) can significantly impact the profitability of businesses operating in energy-intensive sectors (wholesale, manufacturing), leading to default risks. Furthermore, technologies such as electric tractors—used as decarbonization levers in the agricultural sector and financed by Exim Banca Românească—are costly to adopt and pose risks for the financed entities. This may result in increased capital and operating expenditures, which in turn may reduce profit margins for the financed sectors, posing a credit risk for Exim Banca Românească.

Risks and opportunities were assessed as material when exceeding a certain materiality threshold defined as a percentage of the Bank's own funds. More details can be found in section 7.1.4.

7.1.3.3.4 Anticipated Financial Effects of Significant Risks and Opportunities

Anticipated financial effects will be determined by the bank following the implementation of stress tests and scenario analysis regarding financial risks and opportunities.

By monitoring risk indicators, capital, solvency, liquidity, etc., in line with NBR requirements and through engagement with stakeholders, the Bank is capable of developing a resilient business model.

7.1.3.3.5 Resilience of the Strategy and Business Model and Ability to Address Significant Impacts and Risks and Seize Related Opportunities

The Bank conducted its first double materiality assessment exercise for the purpose of this 2024 report, and therefore cannot provide a comparison with the previous reporting period.

7.1.3.3.6 IROs Subject to ESRS Disclosure Requirements

The material impacts, risks, and opportunities identified in the DMA process have been presented in section 7.1.3.1.4 regarding the result of the assessment of significant impacts, risks, and opportunities, including how they contribute to the Bank's strategy and business model.

7.1.4 Management of Impacts, Risks, and Opportunities

7.1.4.1 Methodologies and Assumptions Applied

Materiality Assessment Process

The Bank has developed a methodology for assessing the Group's double materiality (DMA) based on existing due diligence processes and in accordance with the requirements set out in the European Sustainability Reporting Standards (ESRS), as well as an internal analytical tool for this purpose.

Given that 2024 is the first year in which a double materiality analysis was carried out to identify all relevant sustainability topics, the Bank collaborated with an external consultant. The assessment methodology will continue to be developed for future reporting exercises.

7.1.4.2 Process for Identifying, Assessing, Prioritizing, and Monitoring Impacts, Risks, and Opportunities – IRO-1

The double materiality analysis (DMA) approach was based on three main phases:

1. Understanding the Context – In this stage, an overview was carried out on the Bank's and its subsidiary EximAsig's activities and business relationships, the context in which they operate, and the stakeholder landscape. This overview provided essential insights for identifying relevant sustainability-related impacts, risks, and opportunities (IROs).
2. Identification and Assessment of Impacts, Risks, and Opportunities – The goal of this phase was to identify the IROs associated with the sustainability topics relevant to the Bank and its subsidiary. Based on the ESRS 1 AR 16 list and the information collected during the first phase, the relevant IROs were determined. The IROs identified as relevant for the Group's activity were subsequently evaluated based on their impact and/or financial materiality.

The impact was assessed based on impact materiality, while risks and opportunities were assessed based on financial materiality. This process resulted in a preliminary list of material IROs, defined using established significance thresholds, which was then reviewed by internal experts for validation.

3. Validation of Results – In this final phase, the double materiality analysis was validated by internal experts and the final outcome was approved at the governance level.

Impact Identification Process

Impact is understood as the effect that the Group has or could have on the economy, the environment, or people, including human rights, as a result of its activities or business relationships. The impact can be negative or positive, actual or potential, short- or long-term, intentional or unintentional, reversible or irreversible.

To identify relevant impacts across the entire value chain (own operations, upstream and downstream), the information collected during the context analysis phase was used.

Given the business model and the composition of the Exim Banca Românească group, the main impacts are related to the Bank's portfolio (downstream value chain). In this regard, it was necessary to analyze and identify the Bank's main exposures to various sectors in order to understand the main impacts associated with these sectors.

Based on banking exposure data, detailed at the section, division, and NACE code level, materiality thresholds were established to determine the Bank's key portfolio exposures.

These thresholds (set at section level: 10%, division: 8%, class: 5%) served as filters to prioritize areas representing the most substantial financial or operational risks, opportunities, or impacts within the portfolio.

Once the main financed NACE classes were established for non-retail exposures, associated impacts were identified using the UNEP Impact Radar methodology, which also provides an interoperability tool for ESRS alignment. These were then mapped to the ESRS AR16 list of sustainability matters.

Retail value chain impacts were also mapped using the UNEP Impact Radar methodology, referencing the impact of NACE codes in the financial sector. For identifying impacts related to upstream and own operations value chains, results from the context analysis and other reporting standards (e.g., GRI and SASB) were used.

Impact Assessment

For own operations and the upstream value chain, domain experts from the bank assessed each impact using a score from 0 to 5. An impact scoring 2.5 or higher was considered significant.

The ‘Severity’ assessment included three parameters: ‘Scale’, ‘Scope’, and ‘Irremediable Character’. For actual negative impacts, materiality was based on severity, and each of these three parameters was evaluated. For potential negative impacts, the final score was based on both ‘Severity’ and ‘Likelihood’. For potential negative impacts related to human rights, ‘Severity’ was prioritized over ‘Likelihood’. For actual positive impacts, ‘Scale’ and ‘Scope’ were assessed in determining the severity score. For potential positive impacts, ‘Likelihood’ was also assessed and factored into the final score, similarly to potential negative impacts.

The 2.5 threshold for impact materiality analysis was chosen to ensure that only those impacts considered important or higher were regarded as significant.

Impacts scoring below 2.5 are classified as “informative” or “minimal”, meaning they are not considered material for decision-making or reporting purposes. By focusing on impacts scoring 2.5 or higher, Exim Banca Românească ensures its analysis addresses only those issues that could have a tangible effect on people and the environment, while avoiding overemphasis on lower-priority issues.

The chosen threshold aligns with typical practices in sustainability reporting (EFRAG Implementation Guidance on DMA), ensuring that only impacts with the potential to substantially affect stakeholders and/or the environment are considered significant.

Risk and Opportunity Identification Process

To identify relevant risks and opportunities throughout the entire value chain (own operations, upstream and downstream – retail and non-retail), the information collected during Phase 1 of the context analysis was used.

The risk and opportunity identification process was based on analyzing this information and mapping it in accordance with ESRS AR16 sustainability topics. The Bank mapped the sectors it finances against relevant SASB standards (e.g., the SASB Consumer Finance standard was used for the retail value chain, and the SASB Home Builders standard was used for risks and opportunities linked to entities financed by the Bank in the residential and non-residential construction sectors).

In line with ESRS 1, Application Requirement 15, the Bank will continue to enhance its financial materiality analysis by introducing both quantitative and qualitative elements in future reporting exercises. However, for this first reporting exercise, the Bank qualitatively considered the following elements and included them as applicable for each relevant risk and opportunity:

- Potential situations where future events could affect the ability to generate cash flows;
- Capitals not recognized as assets in financial reporting, but which have a significant influence on financial performance (e.g., intellectual capital);
- Possible future events that could influence the evolution of these capitals.

Assessment of Risks and Opportunities – Financial Materiality

The financial materiality assessment was conducted to evaluate the sustainability topics that could trigger material financial effects related to risks and opportunities for the Group. For financial materiality, each risk or opportunity was assessed based on potential magnitude and probability.

The scale used for financial materiality ranged from 0 to 3 (0 being no impact and 3 being extremely critical). A threshold of 1.5 was set to capture all risks and opportunities that could have at least a significant impact on the organization, excluding those with negligible effects.

A 1.5 threshold also ensures that risks and opportunities with marginal but visible impact (within the 1.5–2 range) are considered, thereby avoiding the underestimation of significant trends or changes that may affect the organization in the short or medium term.

Material Impacts, Risks, and Opportunities

In the coming period, the Bank aims to improve its internal framework for evaluating the financial effects of material risks and opportunities in the lending activity so that these effects can be taken into account when setting capital targets and tolerance limits to manage potential impacts on the Bank's profit and loss.

To improve the regulatory framework for managing climate and environmental risks, the Bank has contracted specialized consultancy services for 2025.

The Bank has identified its impact on the environment and society (impact materiality assessment) as well as the sustainability-related risks it is exposed to (financial materiality assessment). For the EximAsig subsidiary, a climate change risk has been identified through its underwriting of property insurance.

The result is aggregated by ESRS topic and shows that E1, S1, S4, and G1 are the most important areas of sustainability for the Group.

7.1.4.3 Decision-Making Process and Related Internal Control Procedures

The Management Committee of Exim Banca Românească is responsible for ensuring the execution of the DMA and for the proper integration of the identified material IROs into the Bank's strategy, governance, and processes. The Audit Committee monitors the development of the double materiality framework, while the Board of Directors approves the DMA results, as well as any corresponding changes to the policies, strategies, and business model where necessary.

Furthermore, domain experts from internal structures are involved in both financial materiality and impact assessments, and stakeholders are consulted. The preliminary result of the DMA is validated by the Bank's expert group, and the materiality thresholds used to determine significance are recommended by the Bank's risk management experts.

7.1.4.4 General Risk Management Process, Overall Risk Profile

The material impacts, risks, and opportunities identified through the DMA process are considered at the Bank level in terms of their implications for the business model, risk management strategy, or internal governance framework.

The Bank's risk management strategy is designed to identify and manage significant risks across all internal structures. Its goal is to ensure that capital adequacy requirements are aligned with the Bank's risk appetite, taking into account the risk structure of activities across various levels of the Bank.

The Bank sets a risk profile for each significant risk and has a risk appetite framework that governs the risks it is exposed to.

The Bank's risk management framework integrates all business lines and internal units, ensuring awareness of risk exposure and informed decision-making. The framework covers both on-balance-sheet and off-balance-sheet risks and addresses current and future risks. It also includes periodic and transparent reporting mechanisms. The risk management function is subject to independent internal assessment, generally through the internal audit function.

The general risk management process and the overall risk profile are currently under review through a consultancy program for the implementation of ESG requirements at the Bank, taking into account the results of the double materiality analysis, specific regulatory requirements, and the results of a GAP analysis conducted on ESG risk management. The program primarily aims to review the following documents and/or processes:

- The strategy for managing significant risks, ensuring ESG risks are included in the risk appetite framework, implementing internal monitoring through specific indicators for monitoring climate risks, and setting objectives, targets, and limits to evaluate and mitigate climate, environmental, and social risks;

- The existing risk management framework, incorporating climate risks to ensure data collection, analysis, and reporting of exposures to climate and environmental risks, including identification, evaluation, monitoring, management, and reporting to facilitate decision-making at management and subcommittee levels, as well as monitoring loans from the perspective of these risks;
- The internal process for assessing capital and liquidity adequacy with respect to risks, ensuring ESG risks, including climate and environmental risks, are included;
- Stress scenarios to include ESG factors, ensuring the inclusion of climate and environmental risks, and developing scenarios for running periodic stress test exercises that incorporate these factors in order to monitor the impact of climate and environmental risks across the entire credit portfolio;
- Policies/measures to reduce climate risks, ensuring the evaluation of exposures to “brown” sectors, the establishment of relevant indicators, and the measurement of portfolio exposure to both physical risk and transition risk.

7.1.4.5 List of Disclosure Requirements from the ESRS Covered in the Sustainability Statement – IRO-2

Based on the results of the double materiality analysis and in accordance with the requirements and reporting structure outlined in ESRS 1 AR16, the Bank has determined the list of data points to be covered in the sustainability report.

Below is an index of the main reporting requirements and the sections of the sustainability report in which they have been addressed, structured by transversal standards and the Group’s most important sustainability topics, namely E1, S1, S4, and G1.

Standard ESRS	Disclosure Requirement	Requirement Description	Page
ESRS 2	BP-1	General basis for preparing sustainability statements	38
	BP-2	Disclosures relating to specific circumstances	39
	GOV-1	Role of the administrative, management, and supervisory bodies	41
	GOV-2	Information provided to the administrative, management, and supervisory bodies and the sustainability matters addressed by them	46
	GOV-3	Integration of sustainability performance in incentive systems	47
	GOV-4	Statement on due diligence process	47
	GOV-5	Risk management and internal control systems relating to sustainability reporting	48
	SBM-1	Strategy, business model and value chain	49
	SBM-2	Interests and views of stakeholders	62
	SBM-3	Significant impacts, risks, and opportunities and their interaction with the strategy and business model	64
	IRO-1	Description of processes for identifying and assessing significant impacts, risks, and opportunities	71
	IRO-2	ESRS disclosure requirements covered by the sustainability statement of the undertaking	74

ESRS E1	E1-1	Transition plan for climate change mitigation	111
	E1-2	Policies related to climate change mitigation and adaptation	112
	E1-3	Actions and resources related to climate change policies, indicators, and targets	111
	E1-4	Targets related to climate change mitigation and adaptation	111
	E1-5	Energy consumption and energy mix	114
	E1-6	Gross GHG emissions by categories 1, 2, 3 and total GHG emissions	114
ESRS S1	S1-1	Policies related to own workforce	124
	S1-2	Processes for engagement with own workers and their representatives on impacts	127,123
	S1-3	Processes for addressing negative impacts and grievance mechanisms for own workers	121
	S1-4	Measures on significant impacts on own workforce and approaches to mitigating significant risks and pursuing significant opportunities, as well as effectiveness of actions	N/A
	S1-5	Targets for managing significant negative impacts, promoting positive impacts, and managing significant risks and opportunities	N/A
	S1-6	Characteristics of the undertaking's employees	122,120
	S1-7	Characteristics of non-employees within the undertaking's own workforce	N/A
	S1-8	Coverage of collective bargaining and social dialogue	123
	S1-9	Diversity indicators	127
	S1-10	Adequate wages	122,127
	S1-11	Social protection	127
	S1-12	Persons with disabilities	127
	S1-13	Training and skill development indicators	127,125
	S1-14	Health and safety indicators	124
	S1-15	Work-life balance indicators	124
	S1-16	Remuneration indicators (pay gap and total remuneration)	125
	S1-17	Incidents, complaints, and serious issues concerning human rights	N/A

ESRS S4	S4-1	Policies regarding consumers and end users	128
	S4-2	Engagement process with consumers and end users on impacts	129
	S4-3	Processes for addressing negative impacts and grievance mechanisms for consumers and end users	129
	S4-4	Measures regarding significant impacts on consumers and end users, approaches for managing significant risks and pursuing opportunities, and effectiveness of measures	135
	S4-5	Targets for managing significant negative impacts, promoting positive impacts, and managing significant risks and opportunities	135
ESRS G1	G1-1	Corporate culture and policies on professional conduct and corporate culture	135,140
	G1-2	Supplier relationship management	138
	G1-3	Prevention and detection of corruption and bribery	140,141
	G1-4	Confirmed cases of corruption or bribery	140
	G1-6	Payment practices	138

In addition, regarding the requirement to present a table of all data points derived from other EU legislative acts listed in Appendix B of ESRS 2, it is noted that the Bank was not subject to other legislative requirements from a sustainability reporting perspective. However, starting in 2025, the Bank will conduct its first reporting for the year 2024 based on the ESG transparency requirements under Pillar III.

7.1.4.6 Policies Adopted for Managing Significant Sustainability Matters – MDR-P

Exim Banca Românească recognizes the importance of managing significant sustainability matters to ensure a positive impact on the environment, society, and the economy, while also appropriately managing and capitalizing on associated risks and opportunities. In this regard, a series of policies and practices have been adopted or updated to integrate sustainability principles into the Bank's activities. These regulations are structured according to the three main areas—environmental, social, and governance—as well as from a value chain perspective.

Regulations addressing **environmental** impact:

- **Exim Banca Românească's Sustainability Strategy** aims to provide an appropriate framework for setting goals related to sustainable activities and for implementing and monitoring them, being aligned with the European Union's sustainable development agenda. Specific objectives have been defined to guide the Bank's fundamental approach to sustainable development, along with strategic action measures aligned with business goals.

The assumptions considered in defining the Sustainability Strategy include:

- the need to comply with legislative requirements (such as EU Taxonomy reporting and the CSRD 2464/2022 directive on corporate sustainability reporting, as well as recommendations from supervisory and regulatory authorities or other specialized bodies);
- integration of the Sustainability Strategy into the Bank's business and significant risk management strategies;
- implementation of the double materiality principle—financial materiality (the potential positive or negative impact of sustainability matters on the Bank's financial performance) and environmental and social materiality (the potential impact of the Bank's operations on the environment and society);
- the influence of sustainability principles and ESG factors on the internal regulatory framework regarding financial and non-financial reporting, reputation and business model, products and services, governance, value chain, etc.

The objectives of the 2025–2027 Sustainability Strategy are focused on the three pillars—environment, social, and governance.

- The Rule on the Implementation of Sustainability Requirements is intended to provide the appropriate framework for implementing the Bank’s Sustainability Strategy and for monitoring the achievement of the assumed objectives and the actions defined in sustainability-related action plans. It also sets general responsibilities related to certain processes connected to reporting requirements at the level of the Bank’s structures.

The Rule aims to:

- establish an integrated governance concept at the Bank level regarding the implementation of sustainability requirements;
- ensure the consistent transposition of legal and/or regulatory requirements into the Bank’s internal regulatory framework;
- create an internal collaboration framework across departments to optimize the use of resources and expertise within the organization, and assign responsibilities for implementing sustainability requirements across the Bank’s entities.

- Exim Banca Românească’s NCS Policy on Sustainable Development ensures that sustainable development objectives are integrated into all financing, guaranteeing, and insurance activities carried out by the Bank on behalf of and in the name of the state, along the following lines:

1. Prioritizing the allocation of state funds to sustainable projects:

- Development of green financing, guarantee, and insurance products (*Green Loans, Green Guarantees, and Green Export Insurance*) to prepare SMEs for EU taxonomy and to support the transition to sustainable and environmentally friendly business practices, by prioritizing projects that conserve biodiversity, use renewable energy, improve energy efficiency, optimize resource and waste use, and prevent pollution and environmental degradation;
- Development of support programs for SMEs for the financing and guaranteeing of energy efficiency and carbon emission reduction projects, prioritizing projects with low or zero carbon (CO₂) emissions;
- Development of financing and guarantee products in the field of the circular economy.

2. Managing financial risks arising from climate change, resource depletion, environmental degradation, and social issues

3. Promoting transparency and a long-term vision

- General Procedure for Environmental and Social Impact Assessment of projects supported officially by Exim Banca Românească on behalf of and in the name of the state:

This regulation outlines the stages of the process by which Exim Banca Românească NCS assesses requests for official support of export credits in terms of environmental and social impact.

The selection, classification, analysis, and evaluation processes are carried out for all requests for financing/guaranteeing/insuring export credits that fall under the *Policy on Environmental and Social Impact in Officially Supported Export Credits* (i.e., export credits with a term exceeding two years), following the principles and rules set out in the *OECD Council Recommendation on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence* (“the Recommendation”).

Regulations addressing **social impact**:

- Exim Banca Românească's Code of Ethics for Staff – expresses the values, ethical and corporate principles promoted within Exim Banca Românească. The Code of Ethics fosters a culture of integrity by encouraging ethical professionalism and supports the formation and implementation of ethical values, responsible behaviors, and actions within the Bank.
- Policy on Promoting Diversity Management at Exim Banca Românească – outlines the approach to embracing and leveraging differences to achieve positive outcomes at individual, team, and organizational levels. Diversity promotes behaviors and actions that create an environment conducive to expressing potential and refers to the variety of differences among individuals within the organization, encompassing acceptance and respect. These differences include criteria such as education and professional experience, gender, age, ethnicity, beliefs and ideologies, equal opportunities and fair treatment for leadership promotion, as well as personal traits like skills, competencies, needs, and working styles.
- Policy on Managing Conflicts of Interest within the Bank – defines how to manage conflicts of interest through the identification, evaluation, handling, and mitigation/prevention of both potential and actual conflicts at the institutional level, as well as individual interests of employees, including members of the management body, that could negatively impact their responsibilities. The policy aims to strengthen the internal control framework by:
 - ✓ Identifying areas (relationships, services, activities, transactions) where conflicts may arise;
 - ✓ Identifying employee conflicts of interest, including for management board members and key function holders, and establishing measures to prevent or manage them;
 - ✓ Assigning roles and responsibilities for the implementation of this policy;
 - ✓ Ensuring compliance with national and EU legislation and regulations.
- **Policy on the Processing of Personal Data at Exim Banca Românească –**

As a data controller, the Bank establishes rules, *standards, and fundamental principles for personal data processing*. Through the “*Data Protection Officer*” and in accordance with the internal regulatory framework—mainly the policy and its associated regulations—Exim Banca Românească continuously monitors compliance with data protection laws. This applies to processing activities carried out directly by the Bank (alone or jointly with others) or indirectly by processors authorized by the Bank.

- **Information Security Policy** – outlines principles and responsibilities concerning IT systems and presents the Bank's approach to information security management, system protection, and ensuring the confidentiality, integrity, and availability of the data and information it handles. Main objectives include:
 - ✓ Ensuring a secure working environment for all employees and authorized users;
 - ✓ Training personnel and ensuring awareness of the policy and their responsibilities regarding data and system protection;
 - ✓ Minimizing disruptions from incidents or failures;
 - ✓ Ensuring business continuity in case of major incidents, especially for customer services;
 - ✓ Developing and maintaining emergency response capabilities;
 - ✓ Protecting the Bank's reputation.

Regulations related to governance framework:

- Exim Banca Românească's Organization and Operation Regulations and the Policy on Corporate Governance Framework define the responsibilities of the Board of Directors and advisory committees in overseeing the implementation of ESG principles set out in the *Sustainability Strategy*.

Members of the management body have been assigned sustainability-related objectives in their respective areas of activity and expertise, to ensure alignment of performance indicators with the Bank's sustainability goals.

The Management Committee, as the top governing body, is responsible for implementing strategies, objectives, and policies that ensure compliance with banking laws and regulations, and for achieving the Bank's strategic sustainability objectives.

- Exim Banca Românească's Strategy and Business Model define its *strategic objectives and principles for sustainable development*, including:

- Supporting regional and local economic development and climate-focused financing, contributing to increased green/social lending.
- Sustainable development that ensures proper environmental management and financial flow allocation toward a low-carbon, climate-resilient economy through the development of green products and loan portfolio growth.
- Financing SMEs via public programs to aid the transition to a sustainable economy.

- Significant Risk Management Strategy

- Principles of responsible lending by encouraging projects and activities with a favorable environmental or social impact and by considering ESG exposure in credit analysis;
- Processes for identifying debtors with high ESG risk and performing deeper analyses of their business models, including mitigation strategies.

- Anti-Corruption Strategy

Its implementation ensures that all employees and management members of Exim Banca Românească or EximAsig, as well as all parties and entities doing business with the Bank or its subsidiaries (clients, suppliers, agents, etc.), are aware of, understand, and comply with the commitment to prevent and combat corruption, and will behave in accordance with ethical standards, applicable laws, and contracts.

Exim Banca Românească, as a signatory of the declaration supporting the organizational integrity agenda under the National Anti-Corruption Strategy 2021–2025, operates within a transparent and consistent internal control environment. This environment ensures the identification, evaluation, monitoring, and mitigation of risks to which the Bank is exposed in the course of its operations, aiming to achieve long-term objectives.

Accordingly, Exim Banca Românească:

- Adheres to the fundamental values and supports the principles and objectives of the National Anti-Corruption Strategy;
- Commits to fulfilling the specific measures that fall under its exclusive competence;
- Takes all necessary measures to avoid conflicts of interest and incompatibilities, as well as to prioritize public interest above any other, in accordance with the principle of transparency in decision-making and unrestricted access to public information;
- Supports and promotes the implementation of anti-corruption legislation

- Exim Banca Românească NCS Anti-Bribery Policy in the Area of Officially Supported Export Credits

As a Romanian state institution officially supporting export credits, and in line with the *OECD Arrangement on Officially Supported Export Credits* and the *OECD Council Recommendations on Bribery and Officially Supported Export Credits*, Exim Banca Românească has adopted a series of measures aimed at preventing and combating bribery in the area of officially supported export credits granted in the name and on behalf of the state.

Internal regulations grouped by “value chain” perspective

The corporate client lending policy provides for the gradual implementation of the sustainable lending concept in the bank’s lending activity. By applying the sustainable lending concept, the bank will ensure that the granted financings will take into account, in the analysis process, the sustainability factors and the environmental, social, and governance factors.

The general procedure regarding the internal/external Whistleblowing Channel at Exim Banca Românească establishes the appropriate measures for implementing an internal or, as applicable, external whistleblowing mechanism to be used within Exim Banca Românească in order to report actual or potential breaches of regulatory or internal requirements. It gives each employee, member of the bank’s management body or persons conducting internships/documentation the opportunity to submit reports, including anonymously, in case of alleged violations of internal/legal provisions, ethical codes, or discrepancies, with the aim of applying appropriate measures.

The policy on the management of customer complaints/requests states that the bank’s commercial practices are governed by high ethical and professional standards and focus on the fundamental importance of respect, sincerity, honesty, and consistency in conducting activities. One of its basic principles is that any activity should be client-oriented. In this regard, the bank’s main concern is to respect and protect its relationship with customers, provide the highest quality services, and respond to their needs.

Sustainability requirements are reflected in several operational areas of the bank involving aspects related to strategy, governance, risk management, human resources, relations with stakeholders (shareholders, authorities, clients, suppliers, etc.), products and services, reporting and transparency, social and environmental actions, digitalization and data security, asset management, etc. The provisions regarding the establishment and management of sustainability aspects are found both in the regulations concerning the bank’s activity on its own behalf and in those regulating activity on behalf of the state, in terms of supporting sustainable financing, assessing the environmental and social impact of projects benefiting from official support, and granting guarantees for renewable energy.

Exim Banca Românească has approved, through the **Corporate Client Lending Policy, the Credit Risk Policy for Retail Lending Activity of Exim Banca Românească, the Know Your Customer (KYC) Procedure**, as well as through the **Strategy for Managing Significant Risks**, the types of clientele (establishing the principles for their acceptance, which specify at least the categories of clients the bank aims to attract, as well as the maximum acceptable risk level per clients, products, and services), the types of properties that cannot be financed, granting restrictions, regional concentration limits based on socio-economic disparity scores, and country credit exposure limits, with the bank identifying and limiting risk concentrations based on associated risks.

At the same time, according to the **Strategy for Managing Significant Risks**, the bank evaluates client exposures to ESG factors, especially environmental factors and the impact on climate change, as well as the adequacy of mitigation strategies, and sets restrictions on the granting and renewal of certain credit facilities in the case of “Construction” and “Hotels and Restaurants” activities for certain customer segments related to the bank’s own-account activities.

Exim Banca Românească encourages companies requesting financing, guarantee, and insurance products on behalf of and in the account of the state to include sustainability in their business strategy, to integrate sustainability-related risks, to consider negative effects on sustainability and on sustainable investment objectives or on the promotion of environmental or social characteristics in their business decision-making process, encouraging companies to adhere to good governance practices and to uphold the precautionary principle of “do no significant harm,” so that neither environmental nor social objectives are significantly harmed.

Thus, the **Policy on Environmental and Social Impact in the Field of Officially Supported Export Credits – Annex 1 to Exim Banca Românească NCS’s Sustainable Development Policy** stipulates that, in the case of activities carried out in the name and on behalf of the state, contributing to Romania’s commitments for mitigating climate change, Exim Banca Românească does not provide financing or guarantee products for:

- a) the export of new coal-fired power generation plants, or parts thereof, including all components, equipment, materials, and services (including staff training) that are directly required for the construction and commissioning of such power plants. The addition of a new coal-fired power generation unit to an existing plant is considered a new coal-fired power plant;
- b) the export supply of equipment to existing coal-fired power plants, except where all the following conditions are met:
 - the purpose of the supplied equipment is to reduce air pollution, water pollution, or CO2 emissions;
 - the supplied equipment does not extend the useful life of the facility nor increase its capacity.

The restrictions mentioned above do not apply to coal-fired power plants operating with efficient carbon capture, utilization, and storage (CCUS) systems or to the modernization of existing coal-fired power plants for the installation of CCUS.

At the same time, taking into account the objectives and commitments assumed by Romania within the framework of:

- Romania’s Sustainable Development Strategy 2030, approved by Government Decision no. 877/2018;
- The Integrated National Energy and Climate Plan (INECP) for the period 2021–2030, approved by Government Decision no. 1076/2021,

Exim Banca Românească, in the name and on behalf of the state, as Romania’s official *export credit agency (ECA)*, has established a policy and a timeline for the **gradual phase-out of support for export transactions in the fossil fuel sector**.

In the context of the ongoing effort to align with international approaches to combating climate change, the regulations governing the environmental and social impact assessment of projects that benefit from official support from Exim Banca Românească NCS take into account the following aspects:

- the assessment of the impact on respect for human rights in countries with a high risk of violations of international conventions,
- detailed verifications to ensure compliance with the environmental standards of the export destination country,
- monitoring of the implementation of projects classified as Category A and B, both during construction and execution,
- inclusion in the annual portfolio report of the Financing, Guarantees, and Insurance Division (Name and on Behalf of the State) of information regarding the monitoring of the experience gained from applying the environmental and social impact assessment process, and ensuring ex-post transparency on Category A and B transactions by making relevant information available on the website www.eximbank.ro.

In order to ensure a reasonable level of compliance regarding the implementation of sustainability requirements, general responsibilities are established at the level of the main impacted structures, including at the level of the institution’s governing body.

The highest level within Exim Banca Românească with responsibilities for approving policies and strategies—including those involving sustainability aspects—is the Board of Directors, with the following sustainability-specific duties established by the Rules of Organization and Functioning of Exim Banca Românească:

- establishes and approves the bank’s sustainability strategy for a period of at least 3 years, through which objectives related to the three ESG dimensions—Environmental, Social, and Governance—are defined, in close correlation with the Strategy and business model of Exim Banca Românească;
- approves the business model of Exim Banca Românească, ensuring the pursuit of a sustainable business model with durable objectives, related both to the development of the organization itself and the support of its clients’ investment projects;
- oversees the implementation of the strategic sustainability objectives and decides on their prioritization;
- together with its support committees, has responsibilities for creating a strategic and procedural framework for managing the impact on the economy, environment, and society, including human rights;
- approves the Sustainability Report as an integral part of the annual Directors’ Report.

The Management Committee represents the senior management body **responsible for the proper implementation of the strategic sustainability objectives and for aligning the bank with the sustainability requirements** established by the Board of Directors, aimed at ensuring compliance with banking legislation and regulations.

Exim Banca Românească understands the importance of sustainability by focusing on managing the business responsibly, efficiently, and in alignment with the European Union’s sustainable development objectives, as well as national strategies and plans on sustainable development.

With regard to the activities carried out by Exim Banca Românească in the name and on behalf of the state, the *NCS Policy on Sustainable Development* aims to be a continuously evolving document, both formally and in terms of substance, depending on the implementation timeline of the various environmental and climate objectives assumed by Romania at the international level, as well as the fact that these goals may change in the future.

Similar to other European institutions operating in the name and on behalf of the state, the principles considered in drafting the Policy and the proposed Objectives are correlated with the principles and objectives assumed at the national level through strategic documents, such as:

- the UN 2030 Agenda for Sustainable Development,
- the Paris Agreement on Climate Change, ratified by Romania through Law No. 57/2017,
- the European Green Deal,
- the EU Taxonomy,
- the “Fit for 55” package,
- the EU Action Plan: Financing Sustainable Growth, etc.

In particular, the policies governing NCS activities target the application of specific standards laid down in international regulations/recommendations, namely:

1. Common Approaches for Environmental and Social Due Diligence – *Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence* (OECD/LEGAL/0393);
2. Anti-Bribery Recommendations – *Recommendation of the Council on Bribery and Officially Supported Export Credits* (OECD/LEGAL/0447), a shared instrument with the Ministry of Justice;
3. Principles of Sustainable Financing – *Principles and guidelines to promote sustainable lending practices in the provision of official export credit to lower income countries* (OECD/LEGAL/0442).

Exim Banca Românească maintains ongoing communication with shareholders, clients, employees, partners, and other stakeholders, based on which it adapts its policies to meet their interests.

Regarding NCS activity, the bank diligently reviews activities that harm the environment and may have adverse climate effects, as well as those involving suspected forced labor, child labor, or projects where there are suspicions of discrimination on any grounds.

Exim Banca Românească assesses projects from the perspective of environmental and social impact, in accordance with the international standards applicable to the project, consisting of:

- a) reporting the project's environmental and social performance against relevant aspects of the international standards applied in the project; and
- b) considering the necessary measures for preventing, reducing, mitigating, or remedying negative impact and/or improving environmental and social performance, depending on the size of the relevant parties involved in the project, the context of their operations, the nature and extent of potential negative impact, the international standards applied in the project, and the importance of the support provided by Exim Banca Românească NCS in the overall context of the project.

If such activities are not accompanied by impact mitigation measures, they cannot benefit from Exim Banca Românească's financing, guarantee, and insurance products provided in the name and on behalf of the state.

If there is a high probability of a serious violation of human rights, the environmental and social impact assessment of the project is complemented by a specific human rights analysis.

Through its official website, as well as through various communication channels, Exim Banca Românească makes available to stakeholders and/or potentially affected parties various public interest information whenever necessary. Additionally, it submits new policies of the bank, as well as any amendments thereto, to the National Bank of Romania.

Furthermore, in order to ensure transparency requirements, Exim Banca Românească NCS provides, in a clear, balanced, accurate, and timely manner, to all relevant stakeholders (including shareholders, employees, clients, and the general public), key information necessary to enable them to assess the application of sustainable development principles in the activities carried out by Exim Banca Românească in the name and on behalf of the state. Transparency is ensured through the publication of relevant public interest data in the annual activity report and on the website www.eximbank.ro.

From the perspective of NCS activities and the objectives pursued in the implementation of the *Environmental and Social Impact Policy* and the *Anti-Bribery Policy for Officially Supported Export Credits*:

- a) The environmental and social impact assessment process is an integral part of the analysis of all financing/guarantee/insurance applications, within the context of assessing all categories of risks associated with the respective operation, with the ultimate goal of substantiating the approval proposal for the official support instrument of the export transaction.

The parties involved in the project are required to provide all necessary information so that Exim Banca Românească can perform a proper assessment. To this end, both the Policy and the tools needed for risk assessment (questionnaires) are transparently published on the bank's website to involve current and potential clients in the implementation of the Policy throughout the entire business relationship, as well as to fulfill the transparency requirement necessary in the context of the OECD accession process.

- b) Exim Banca Românească promotes responsible business conduct by all parties involved in requesting official support for an export credit. In this regard:

- Exim Banca Românească informs exporters and, where applicable, other relevant parties of the legal consequences of bribery in international business transactions, in accordance with Romanian legislation, including provisions concerning bribery of foreign and Romanian public officials, as well as bribery in the private sector;
- Exim Banca Românească encourages exporters and other relevant parties, as applicable, to develop, implement, and document adequate control systems to prevent and detect acts of bribery;
- Exim Banca Românească encourages exporters to raise awareness of the fact that parties involved in international business transactions must also comply with and adhere to all relevant laws and regulations prohibiting acts of bribery in the state or jurisdiction in which they operate and in the country or jurisdiction where the project is or will be implemented.

7.2 Environmental Information

7.2.1 EU Taxonomy (under Article 8 of Regulation) (UE) 2020/852)

7.2.1.1 Applicable Regulatory Framework

To ensure compliance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), the Bank's Sustainability Report includes a dedicated section on the applicable regulatory framework related to reporting under the EU Taxonomy. This section outlines both the relevant European legislation and how it has been transposed into national legislation, including orders issued by the National Bank of Romania (NBR).

1. Relevant European Legislation:

- Directive (EU) 2022/2464 on corporate sustainability reporting (CSRD): This directive expands non-financial reporting requirements by requiring large and listed companies to disclose detailed information on the environmental, social, and governance impact of their activities.
- European Sustainability Reporting Standards (ESRS): Developed to provide a unified reporting framework, these standards establish specific indicators and requirements for ESG reporting, ensuring comparability and transparency of information.
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

2. Transposition of the CSRD into National Legislation:

- Order of the Ministry of Finance no. 85/2024 (OMF 85/2024): This order transposes the CSRD into Romanian legislation, setting reporting requirements for local companies.

3. Banking Sector-Specific Regulations Issued by the NBR:

- NBR Order no. 1/2024: This order of the National Bank of Romania transposes the CSRD into national legislation, establishing reporting requirements for financial institutions.

4. Reporting Requirements under the EU Taxonomy:

- Reporting obligations: Financial institutions, including banks, are required to disclose the extent to which their economic activities are aligned with the sustainability criteria established by the EU Taxonomy.
- Specific indicators: The reporting must include indicators such as the proportion of assets aligned with the taxonomy, exposure to environmental risks, and contribution to sustainability objectives.

5. Implementation and Compliance:

- Reporting process: The bank has implemented internal procedures and processes for collecting and verifying the data required for taxonomy-aligned reporting.
- Ensuring compliance: The bank has put in place specific control mechanisms to ensure the accuracy and compliance of the information reported.

By including these elements in the Sustainability Report, the bank demonstrates transparency and compliance with current sustainability reporting requirements.

7.2.1.2 Methodology and Limitations

The Green Asset Ratio (GAR) is the benchmark indicator for reporting taxonomy alignment. It indicates the proportion of the bank's assets that finance and are invested in taxonomy-aligned economic activities, expressed as a percentage of total covered assets. However, the GAR has limited informational value, being strictly defined under Delegated Regulation (EU) 2021/2178.

The calculation of the green asset ratio (GAR) for on-balance sheet exposures covers the following accounting categories of financial assets, including loans and receivables, debt securities, equity holdings, and recovered guarantees:

- financial assets measured at amortised cost;
- financial assets measured 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 financial assets not held for trading, mandatorily measured at fair value through profit or loss;
- real estate collateral obtained by credit institutions through foreclosure in exchange for debt cancellation.

Exposures are presented as gross carrying amounts, not reduced by impairment adjustments, in accordance with the financial reporting data for prudential supervision purposes (FINREP).

Exposures to central governments, central banks, and supranational issuers are excluded from both the numerator and denominator of the GAR.

Exposures to undertakings not subject to the obligation to publish non-financial information under Articles 19a or 29a of Directive 2013/34/EU, financial assets held for trading, interbank demand loans, and derivative financial instruments are excluded from the numerator of the indicator.

Retail Line of Business

Household exposures include only the mortgage loan portfolio. Since mortgage loans relate to real estate activities (residential), all mortgage exposures are considered eligible under the climate change mitigation (CCM) activity as they fall under Section 7.7 of the Climate Delegated Act (Acquisition and ownership of buildings).

Exposure data related to loans for building renovations and car loans is not collected separately, as it is included under consumer loans. Currently, the bank does not collect sufficient information to enable classification in these categories.

Given the lack of centralized data **for all technically assessed buildings** at the national level regarding Energy Performance Certificates (EPC), to analyze taxonomy alignment of exposures, the bank considered the portfolio of standard mortgage loans granted between 2022–2024 and the entire portfolio of “Prima Casă/Noua Casă” loans, where the bank had access to the necessary information.

To determine Taxonomy alignment, the bank analyzed the aforementioned portfolio using an implemented methodology and considered aligned only those loans that financed buildings constructed before 2021, with energy class A and that met the DNSH criterion (“do no significant harm”), as determined based on a specific physical risk analysis. The MSS criterion (“Minimum Social Safeguards”) was not included in the alignment analysis for the Retail/Household segment, in accordance with the latest report by the European Commission on MSS. Loans that financed buildings constructed starting from 2021 were considered non-aligned because the condition regarding primary energy demand (PED) compliance could not be verified according to the requirements of the Delegated Regulation.

Corporate Line of Business

The exposure in the corporate segment is collected from the internal database for each type of entity and product category, for entities that, in the reporting year, fall under CSRD reporting requirements.

The exposures considered in the numerator are those toward undertakings subject to the obligation to publish non-financial information under Article 19a or 29a of Directive 2013/34/EU, as transposed by OMFP 85/2024 and BNR Order 1/2024.

For general-purpose financings granted to counterparties subject to sustainability reporting, key performance indicators (KPIs) related to turnover and capital expenditure (CapEx) reported by these entities are used. For this evaluation, there is no mandatory public database that counterparties are required to use for reporting non-financial information. Therefore, the bank uses information obtained bilaterally from counterparties or publicly available data from their annual reports. Since most non-financial entities have not yet published their 2024 reports, the eligibility and alignment reporting for these entities is based on data published for 2023.

When the use of proceeds is known, financial institutions must assess whether the information provided by counterparties on the alignment of their economic activities with the taxonomy provides sufficient evidence of compliance with the relevant individual Technical Screening Criteria (TSC). Due to documentation limitations related to the fulfillment of these criteria for financed projects, the bank did not classify any financings as aligned in 2024 based on such an evaluation.

Where no information was available, the bank assumed that 0% of the counterparty's turnover/CapEx is eligible/aligned with the taxonomy.

Financing of Local Public Authorities

Where the use of proceeds was known, exposures were collected from the internal database.

According to clarification notes from the European Commission regarding exposure related to financing intended for local governments, cases where the "use of proceeds" (UoP) is unknown are reported under the category of Central Administrations and Supranational Issuers, i.e., outside the GAR calculation.

The bank does not have a business model based on the financing of public housing and, therefore, does not report eligible exposures from loans granted to municipalities for public housing.

Currently, the collection of eligibility and alignment data for the financing of other activities and assets (other than public housing) granted to local governments is not feasible because the loan purpose stated in the tender specifications is often "multi-purpose." Even where the purpose is listed as "co-financing with EU funds," there is ongoing change in the usage/financing limit ratio due to new loan destinations or modifications to existing ones.

Moreover, where SC (substantial contribution) and DNSH (do no significant harm) conditions in EU-funded programs are not fully aligned with the Taxonomy requirements, they are still considered fulfilled, including from a Greenwashing risk perspective.

Collateral Obtained through Foreclosure

For foreclosed residential real estate, the same eligibility and alignment determination mechanism was applied as for household exposures.

For non-residential collateral, no alignment was identified.

Off-Balance Sheet Exposures

For off-balance sheet exposures, the bank provides data only for financial guarantees that back loans, receivables, or other debt instruments issued to undertakings, as it does not manage assets.

For guarantees, depending on the source of the exposure — e.g., corporations subject to CSRD — eligibility and alignment data were collected following the credit issuance procedure. The eligibility and alignment percentages reported by the CSRD-reporting entity were applied to the exposure of the issued guarantee.

Bank guarantees issued individually and fully collateralized with cash, or bank guarantees issued under non-cash/multi-product limits fully collateralized with cash, inherit the client's eligibility and alignment status — if the client has other exposures (excluding investment loans). If the client has no other recorded exposures, the guarantees are considered ineligible.

Reporting on Nuclear and Fossil Gas-Related Activities

The bank has limited exposures to clients engaged in economic activities related to electricity production or heating using nuclear facilities or fossil gas in combined heat/cooling and power generation plants.

At the end of 2024, the bank analyzed its corporate portfolio based on NACE codes associated with the client's main activity to identify potential taxonomy eligibility. Then it verified whether the main activity according to the NACE code matched the descriptions of EU Taxonomy activities 4.26–4.31.

Following the verification, a single eligible but non-aligned exposure was identified related to activity 4.29 (construction or operation of electricity generation facilities using fossil gaseous fuels), amounting to 0.2 million lei.

7.2.1.3 Disclosure Requirements

In accordance with the regulatory framework outlined above, for the year 2024, the bank is required to disclose key performance indicators (KPIs) related to on-balance sheet and off-balance sheet exposures (Green Asset Ratio – GAR and Off-Balance Sheet Exposure Ratio – FinGuar KPI). In summary, for the year 2024, Exim Banca Românească reports the following key performance indicator values for credit institutions under Article 8 of the EU Taxonomy Regulation:

Summary regarding KPIs on which credit institutions must provide information under Article 8 of the Taxonomy Regulation.

		Total environmentally sustainable assets (mil. RON)	KPI ****	KPI *****	% coverage (of total assets)	% of assets excluded for GAR numerator [Article 7(2) and (3) and Sector 1.1.2 of Annex V]	% of assets excluded for GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]
Primary KPI	Green Asset Ratio (GAR) stock	127	0.73%	0.68%	63.3%	37.7%	36.7%
		Total environmentally sustainable assets (mil. RON)	KPI	KPI	% coverage (of total assets)	% of assets excluded for GAR numerator [Article 7(2) and (3) and Sector 1.1.2 of Annex V]	% of assets excluded for GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]
Supplementary KPI	GAR (flux)	22	0.21%	0.25%	51.7%	27.2%	48.3%
	Trading portfolio*						
	Financial guarantees						
	Assets under management						
	Fee and commission income**						

* For credit institutions that do not meet the conditions stipulated under Article 94(1) of the CRR or Article 325a(1) of the CRR.

** Revenue from fees and commissions from services other than lending and asset management.

*** % of assets covered by KPIs in the bank's total assets.

**** Based on the KPI regarding the counterparty's turnover.

***** Based on the KPI regarding the counterparty's CapEx, excluding lending activities, for which general-purpose loans are evaluated using the turnover KPI.

1. Assets included in the GAR calculation (based on turnover)

Millions of RON		Carrying amount [gross], total	Reference date for providing information T									
			Climate change mitigation (CCM)					Climate change adaptation (CCA)				
			of which, to taxonomy-relevant sectors (taxonomy-eligible)					of which, to taxonomy-relevant sectors (taxonomy-eligible)				
			of which, environmentally sustainable (taxonomy-aligned)					of which, environmentally sustainable (taxonomy-aligned)				
			of which, use of proceeds	of which, transition	of which, enabling			of which, use of proceeds	of which, transition	of which, enabling		
	GAR - Assets included in the numerator and denominator											
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	6.986	1.326	127	115	112	1	0	0	-	0	0
2	Financial undertakings	1.215	241	14	4	1	1	0	0	-	0	0
3	Credit institutions	1.215	241	14	4	1	1	0	0	-	0	0
4	Loans and receivables	1.215	241	14	4	1	1	0	0	-	0	0
5	Debt securities, including use of income (UoP)											
6	Equity instruments											
7	Other financial corporations	-	-	-	-	-	-					
8	of which investment firms	-	-	-	-	-	-					
9	Loans and receivables											
10	Debt securities, including use of income (UoP)											
11	Equity instruments											
12	of which management companies	-	-	-	-	-	-					
13	Loans and receivables											
14	Debt securities, including use of income (UoP)											
15	Equity instruments											
16	of which insurance undertakings	-	-	-	-	-	-					
17	Loans and receivables							-	-	-	-	-
18	Debt securities, including use of income (UoP)											
19	Equity instruments											
20	Financial interparent	696	364	2	-	-	-					
21	Loans and receivables	696	364	2	-	-	-					
22	Debt securities, including use of income (UoP)											
23	Capital instruments											
24	Households	3.124	714	111	111	111	-					
25	of which loans secured by residential real estate	714	714	111	111	111	-					
26	of which loans for the renovation of buildings											
27	of which car loans											
28	Funding for local administrations	1.944	-	-	-	-	-					
29	Housing financing											
30	Other forms of financing for local administrations	1.944	-	-	-	-	-					
31	Guarantees obtained by taking possession: residential and commercial real estate	6	6	0	0	0	-					
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)	10.264										
33	Financial and non-financial undertakings	9.307										
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive	9.299										
35	Loans and receivables	9.212										
36	of which, loans secured by commercial real estate											
37	of which, loans for the renovation of buildings											
38	Debt securities, including use of income (UoP)											
39	Equity instruments	87										
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive	8										
41	Loans and receivables	8										
42	Debt securities											
43	Equity instruments											
44	Derivative financial instruments	43										
45	Interbank call loans											
46	Cash and cash-equivalent assets	514										
47	Other assets (e.g. goodwill, commodities, etc.)	401										
48	Total GAR assets	17.251	1.326	127	115	112	1	0	0	-	0	0
49	Other assets non included in the GAR calculation	10.000										
50	Central governments and supranational issuers	4.626										
51	Exposures to central banks	5.374										
52	Trading portfolio											
53	Total assets	27.251										
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive	268	122	-								
54	Financial guarantees	268	122									
55	Assets under management	-										
56	of which, debt securities											
57	of which, equity instruments											

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T							
		Water and marine resources (WTR)				Circular economy (CE)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
			of which, use of proceeds	of which, enabling			of which, use of proceeds	of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes					8	-	-	-
2	Financial undertakings					-	-	-	-
3	Credit institutions								
4	Loans and receivables								
5	Debt securities, including use of income (UoP)								
6	Equity instruments								
7	Other financial corporations								
8	of which investment firms								
9	Loans and receivables								
10	Debt securities, including use of income (UoP)								
11	Equity instruments								
12	of which management companies								
13	Loans and receivables								
14	Debt securities, including use of income (UoP)								
15	Equity instruments								
16	of which insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of income (UoP)								
19	Equity instruments								
20	Financial interparent					8	-	-	-
21	Loans and receivables					8			
22	Debt securities, including use of income (UoP)								
23	Capital instruments								
24	Households								
25	of which loans secured by residential real estate								
26	of which loans for the renovation of buildings								
27	of which car loans								
28	Funding for local administrations								
29	Housing financing								
30	Other forms of financing for local administrations								
31	Guarantees obtained by taking possession: residential and commercial real estate								
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)								
33	Financial and non-financial undertakings								
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive								
35	Loans and receivables								
36	of which, loans secured by commercial real estate								
37	of which, loans for the renovation of buildings								
38	Debt securities, including use of income (UoP)								
39	Equity instruments								
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive								
41	Loans and receivables								
42	Debt securities								
43	Equity instruments								
44	Derivative financial instruments								
45	Interbank call loans								
46	Cash and cash-equivalent assets								
47	Other assets (e.g. goodwill, commodities, etc.)								
48	Total GAR assets	-	-	-	-	8	-	-	-
49	Other assets non included in the GAR calculation								
50	Central governments and supranational issuers								
51	Exposures to central banks								
52	Trading portfolio								
53	Total assets								
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive								
54	Financial guarantees								
55	Assets under management								
56	of which, debt securities								
57	of which, equity instruments								

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T			
		Pollution (PPC)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			
			of which, use of proceeds	of which, enabling	
	<u>GAR - Assets included in the numerator and denominator</u>				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of income (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which investment firms				
9	Loans and receivables				
10	Debt securities, including use of income (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and receivables				
14	Debt securities, including use of income (UoP)				
15	Equity instruments				
16	of which insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of income (UoP)				
19	Equity instruments				
20	Financial interparent				
21	Loans and receivables				
22	Debt securities, including use of income (UoP)				
23	Capital instruments				
24	Households				
25	of which loans secured by residential real estate				
26	of which loans for the renovation of buildings				
27	of which car loans				
28	Funding for local administrations				
29	Housing financing				
30	Other forms of financing for local administrations				
31	Guarantees obtained by taking possession: residential and commercial real estate				
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities, including use of income (UoP)				
39	Equity instruments				
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets	-	-	-	-
49	Other assets non included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T			
		Biodiversity and ecosystems (BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			
				of which, use of proceeds	of which, enabling
	<u>GAR - Assets included in the numerator and denominator</u>				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of income (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which investment firms				
9	Loans and receivables				
10	Debt securities, including use of income (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and receivables				
14	Debt securities, including use of income (UoP)				
15	Equity instruments				
16	of which insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of income (UoP)				
19	Equity instruments				
20	Financial interparent				
21	Loans and receivables				
22	Debt securities, including use of income (UoP)				
23	Capital instruments				
24	Households				
25	of which loans secured by residential real estate				
26	of which loans for the renovation of buildings				
27	of which car loans				
28	Funding for local administrations				
29	Housing financing				
30	Other forms of financing for local administrations				
31	Guarantees obtained by taking possession: residential and commercial real estate				
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities, including use of income (UoP)				
39	Equity instruments				
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets	-	-	-	-
49	Other assets non included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T				
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)				
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				
		of which, environmentally sustainable (taxonomy-aligned)				
				of which, use of proceeds	of which, transition/a daptation	of which, enabling
	GAR - Assets included in the numerator and denominator					
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	1.334	127	115	112	1
2	Financial undertakings	241	14	4	1	1
3	Credit institutions	241	14	4	1	1
4	Loans and receivables	241	14	4	1	1
5	Debt securities, including use of income (UoP)	-	-	-	-	-
6	Equity instruments	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-
8	of which investment firms	-	-	-	-	-
9	Loans and receivables	-	-	-	-	-
10	Debt securities, including use of income (UoP)	-	-	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which management companies	-	-	-	-	-
13	Loans and receivables	-	-	-	-	-
14	Debt securities, including use of income (UoP)	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-
17	Loans and receivables	-	-	-	-	-
18	Debt securities, including use of income (UoP)	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	Financial interparent	372	2	-	-	-
21	Loans and receivables	372	2	-	-	-
22	Debt securities, including use of income (UoP)	-	-	-	-	-
23	Capital instruments	-	-	-	-	-
24	Households	714	111	111	111	-
25	of which loans secured by residential real estate	714	111	111	111	-
26	of which loans for the renovation of buildings	-	-	-	-	-
27	of which car loans	-	-	-	-	-
28	Funding for local administrations	-	-	-	-	-
29	Housing financing	-	-	-	-	-
30	Other forms of financing for local administrations	-	-	-	-	-
31	Guarantees obtained by taking possession: residential and commercial real estate	6	0	0	0	-
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)	-	-	-	-	-
33	Financial and non-financial undertakings					
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive					
35	Loans and receivables					
36	of which, loans secured by commercial real estate					
37	of which, loans for the renovation of buildings					
38	Debt securities, including use of income (UoP)					
39	Equity instruments					
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive					
41	Loans and receivables					
42	Debt securities					
43	Equity instruments					
44	Derivative financial instruments					
45	Interbank call loans					
46	Cash and cash-equivalent assets					
47	Other assets (e.g. goodwill, commodities, etc.)					
48	Total GAR assets	1.334	127	115	112	1
49	Other assets non included in the GAR calculation					
50	Central governments and supranational issuers					
51	Exposures to central banks					
52	Trading portfolio					
53	Total assets					
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive	122	-	-	-	-
54	Financial guarantees	122	-	-	-	-
55	Assets under management					
56	of which, debt securities					
57	of which, equity instruments					

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Carrying amount [gross], total	Reference date for providing information T-1				
			Climate change mitigation (CCM)				
			of which, to taxonomy-relevant sectors (taxonomy-eligible)				
			of which, environmentally sustainable (taxonomy-aligned)				
				of which, use of proceeds	of which, transition	of which, enabling	
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	8.943	1.514	318	130	130	-
2	Financial undertakings	1.426	181	4	-	-	-
3	Credit institutions	1.426	181	4	-	-	-
4	Loans and receivables	1.372	181	4	-	-	-
5	Debt securities, including use of income (UoP)	54	0	-	-	-	-
6	Equity instruments	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-
9	Loans and receivables	-	-	-	-	-	-
10	Debt securities, including use of income (UoP)	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-
13	Loans and receivables	-	-	-	-	-	-
14	Debt securities, including use of income (UoP)	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-
17	Loans and receivables	-	-	-	-	-	-
18	Debt securities, including use of income (UoP)	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-
20	Financial interparent	2.407	496	184	-	-	-
21	Loans and receivables	2.407	496	184	-	-	-
22	Debt securities, including use of income (UoP)	-	-	-	-	-	-
23	Capital instruments	-	-	-	-	-	-
24	Households	3.355	832	129	129	129	-
25	of which loans secured by residential real estate	832	832	129	129	129	-
26	of which loans for the renovation of buildings	-	-	-	-	-	-
27	of which car loans	-	-	-	-	-	-
28	Funding for local administrations	1.750	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-
30	Other forms of financing for local administrations	1.750	-	-	-	-	-
31	Guarantees obtained by taking possession: residential and commercial real estate	6	6	1	1	1	-
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)	7.780	0,00	0,00	0,00	0,00	0,00
33	Financial and non-financial undertakings	6.925					
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive	6.923					
35	Loans and receivables	6.835					
36	of which, loans secured by commercial real estate	-					
37	of which, loans for the renovation of buildings	-					
38	Debt securities, including use of income (UoP)	-					
39	Equity instruments	87					
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive	2					
41	Loans and receivables	2					
42	Debt securities	-					
43	Equity instruments	-					
44	Derivative financial instruments	3					
45	Interbank call loans	-					
46	Cash and cash-equivalent assets	440					
47	Other assets (e.g. goodwill, commodities, etc.)	411					
48	Total GAR assets	16.723	1.514	318	130	130	-
49	Other assets non included in the GAR calculation	10.302					
50	Central governments and supranational issuers	4.738					
51	Exposures to central banks	5.564					
52	Trading portfolio	-					
53	Total assets	27.025					
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive	33					
54	Financial guarantees	33					
55	Assets under management	-					
56	of which, debt securities	-					
57	of which, equity instruments	-					

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T-1			
		Climate change adaptation (CCA)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			
				of which, use of proceeds	of which, enabling
	GAR - Assets included in the numerator and denominator				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of income (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which investment firms				
9	Loans and receivables				
10	Debt securities, including use of income (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and receivables				
14	Debt securities, including use of income (UoP)				
15	Equity instruments				
16	of which insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of income (UoP)				
19	Equity instruments				
20	Financial interparent				
21	Loans and receivables				
22	Debt securities, including use of income (UoP)				
23	Capital instruments				
24	Households				
25	of which loans secured by residential real estate				
26	of which loans for the renovation of buildings				
27	of which car loans				
28	Funding for local administrations				
29	Housing financing				
30	Other forms of financing for local administrations				
31	Guarantees obtained by taking possession: residential and commercial real estate				
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities, including use of income (UoP)				
39	Equity instruments				
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets				
49	Other assets non included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T-1			
		Water and marine resources (WTR)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which environmentally sustainable (taxonomy-aligned)			
			of which, use of proceeds	of which, enabling	
	GAR - Assets included in the numerator and denominator				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of income (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which investment firms				
9	Loans and receivables				
10	Debt securities, including use of income (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and receivables				
14	Debt securities, including use of income (UoP)				
15	Equity instruments				
16	of which insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of income (UoP)				
19	Equity instruments				
20	Financial interparent				
21	Loans and receivables				
22	Debt securities, including use of income (UoP)				
23	Capital instruments				
24	Households				
25	of which loans secured by residential real estate				
26	of which loans for the renovation of buildings				
27	of which car loans				
28	Funding for local administrations				
29	Housing financing				
30	Other forms of financing for local administrations				
31	Guarantees obtained by taking possession: residential and commercial real estate				
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities, including use of income (UoP)				
39	Equity instruments				
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets				
49	Other assets non included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T-1			
		Circular economy (CE)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			
				of which, use of proceeds	of which, enabling
	GAR - Assets included in the numerator and denominator				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of income (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which investment firms				
9	Loans and receivables				
10	Debt securities, including use of income (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and receivables				
14	Debt securities, including use of income (UoP)				
15	Equity instruments				
16	of which insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of income (UoP)				
19	Equity instruments				
20	Financial interparent				
21	Loans and receivables				
22	Debt securities, including use of income (UoP)				
23	Capital instruments				
24	Households				
25	of which loans secured by residential real estate				
26	of which loans for the renovation of buildings				
27	of which car loans				
28	Funding for local administrations				
29	Housing financing				
30	Other forms of financing for local administrations				
31	Guarantees obtained by taking possession: residential and commercial real estate				
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities, including use of income (UoP)				
39	Equity instruments				
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets				
49	Other assets non included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T-1			
		Pollution (PPC)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			
				of which, use of proceeds	of which, enabling
	GAR - Assets included in the numerator and denominator				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of income (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which investment firms				
9	Loans and receivables				
10	Debt securities, including use of income (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and receivables				
14	Debt securities, including use of income (UoP)				
15	Equity instruments				
16	of which insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of income (UoP)				
19	Equity instruments				
20	Financial interparent				
21	Loans and receivables				
22	Debt securities, including use of income (UoP)				
23	Capital instruments				
24	Households				
25	of which loans secured by residential real estate				
26	of which loans for the renovation of buildings				
27	of which car loans				
28	Funding for local administrations				
29	Housing financing				
30	Other forms of financing for local administrations				
31	Guarantees obtained by taking possession: residential and commercial real estate				
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities, including use of income (UoP)				
39	Equity instruments				
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets				
49	Other assets non included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

1. Assets included in the GAR calculation (based on turnover) - continued

Millions of RON		Reference date for providing information T-1							
		Biodiversity and ecosystems (BIO)				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
			of which, use of proceeds	of which, enabling			of which, use of proceeds	of which, transition/adaptation	of which, enabling
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes					1.514	318	130	130
2	Financial undertakings					181	4	-	-
3	Credit institutions					181	4	-	-
4	Loans and receivables					181	4	-	-
5	Debt securities, including use of income (UoP)					0	-	-	-
6	Equity instruments					-	-	-	-
7	Other financial corporations					-	-	-	-
8	of which investment firms					-	-	-	-
9	Loans and receivables					-	-	-	-
10	Debt securities, including use of income (UoP)					-	-	-	-
11	Equity instruments					-	-	-	-
12	of which management companies					-	-	-	-
13	Loans and receivables					-	-	-	-
14	Debt securities, including use of income (UoP)					-	-	-	-
15	Equity instruments					-	-	-	-
16	of which insurance undertakings					-	-	-	-
17	Loans and receivables					-	-	-	-
18	Debt securities, including use of income (UoP)					-	-	-	-
19	Equity instruments					-	-	-	-
20	Financial interparent					496	184	-	-
21	Loans and receivables					496	184	-	-
22	Debt securities, including use of income (UoP)					-	-	-	-
23	Capital instruments					-	-	-	-
24	Households					832	129	129	129
25	of which loans secured by residential real estate					832	129	129	129
26	of which loans for the renovation of buildings					-	-	-	-
27	of which car loans					-	-	-	-
28	Funding for local administrations					-	-	-	-
29	Housing financing					-	-	-	-
30	Other forms of financing for local administrations					-	-	-	-
31	Guarantees obtained by taking possession: residential and commercial real estate					6	1	1	1
32	Other assets excluded from the numerator for the calculation of GAR (included in the denominator)					-	-	-	-
33	Financial and non-financial undertakings								
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive								
35	Loans and receivables								
36	of which, loans secured by commercial real estate								
37	of which, loans for the renovation of buildings								
38	Debt securities, including use of income (UoP)								
39	Equity instruments								
40	Counterparties from non-EU countries non subject to the disclosure requirements under the Non-Financial Reporting Directive								
41	Loans and receivables								
42	Debt securities								
43	Equity instruments								
44	Derivative financial instruments								
45	Interbank call loans								
46	Cash and cash-equivalent assets								
47	Other assets (e.g. goodwill, commodities, etc.)								
48	Total GAR assets					1.514	318	130	130
49	Other assets non included in the GAR calculation								
50	Central governments and supranational issuers								
51	Exposures to central banks								
52	Trading portfolio								
53	Total assets								
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive								
54	Financial guarantees								
55	Assets under management								
56	of which, debt securities								
57	of which, equity instruments								

2. Assets included in the GAR calculation (based on CapEX)

Millions of RON		Carrying amount [gross], total	Reference date for providing information T				
			Climate change mitigation (CCM)				
			of which, to taxonomy-relevant sectors (taxonomy-eligible)				
			of which, environmentally sustainable (taxonomy-aligned)			of which, use of proceeds	of which, transition
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	6.986	966	118	112	111	0
2	Financial undertakings	1.215	34	3	0	0	0
3	Credit institutions	1.215	34	3	0	0	0
4	Loans and receivables	1.215	34	3	0	0	0
5	Debt securities, including use of proceeds (UoP)						
6	Equity instruments						
7	Other financial corporations	-	-	-	-	-	-
8	of which, investment firms	-	-	-	-	-	-
9	Loans and receivables						
10	Debt securities, including use of proceeds (UoP)						
11	Equity instruments						
12	of which, asset management companies	-	-	-	-	-	-
13	Loans and receivables						
14	Debt securities, including use of proceeds (UoP)						
15	Equity instruments						
16	of which, insurance undertakings	-	-	-	-	-	-
17	Loans and receivables						
18	Debt securities, including use of proceeds (UoP)						
19	Equity instruments						
20	Non-financial undertakings	696	211	3	-	-	-
21	Loans and receivables	696	211	3	-	-	-
22	Debt securities, including use of proceeds (UoP)						
23	Equity instruments						
24	Households	3.124	714	111	111	111	-
25	of which, loans secured by residential real estate	714	714	111	111	111	-
26	of which, loans for the renovation of buildings						
27	of which, car loans						
28	Financing to local governments	1.944	-	-	-	-	-
29	Housing finance						
30	Other forms of financing to local governments	1.944	-	-	-	-	-
31	Collateral obtained through possession	6	6	0	0	0	-
32	Other assets excluded from the numerator (included in the denominator for GAR calculation)	10.264					
33	Financial and non-financial undertakings	9.307					
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive	9.299					
35	Loans and receivables	9.212					
36	of which, loans secured by commercial real estate						
37	of which, loans for the renovation of buildings						
38	Debt securities						
39	Equity instruments	87					
40	Counterparties from non-EU countries not subject to the disclosure requirements under the Non-Financial Reporting Directive	8					
41	Loans and receivables	8					
42	Debt securities						
43	Equity instruments						
44	Derivative financial instruments	43					
45	Interbank call loans						
46	Cash and cash-equivalent assets	514					
47	Other assets (e.g. goodwill, commodities, etc.)	401					
48	Total GAR assets	17.251	966	118	112	111	0
49	Other assets not included in the GAR calculation	10.000					
50	Central governments and supranational issuers	4.626					
51	Exposures to central banks	5.374					
52	Trading portfolio						
53	Total assets	27.251					
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive	268	86				
54	Financial guarantees	268	86				
55	Assets under management	-					
56	of which, debt securities						
57	of which, equity instruments						

2. Assets included in the GAR calculation (based on CapEX) - continued

Millions of RON		Reference date for providing information T							
		Climate change adaptation (CCA)				Water and marine resources (WTR)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, enabling			of which, use of proceeds	of which, enabling		
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	0	0	-	-				
2	Financial undertakings	0	0	-	-				
3	Credit institutions	0	0	-	-				
4	Loans and receivables	0	0	-	-				
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial corporations								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables	-	-	-	-				
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings	-	-	-	-				
21	Loans and receivables	-	-	-	-				
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households	-	-	-	-				
25	of which, loans secured by residential real estate	-	-	-	-				
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing to local governments	-	-	-	-				
29	Housing finance								
30	Other forms of financing to local governments	-	-	-	-				
31	Collateral obtained through possession	-	-	-	-				
32	Other assets excluded from the numerator (included in the denominator for GAR calculation)								
33	Financial and non-financial undertakings								
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive								
35	Loans and receivables								
36	of which, loans secured by commercial real estate								
37	of which, loans for the renovation of buildings								
38	Debt securities								
39	Equity instruments								
40	Counterparties from non-EU countries not subject to the disclosure requirements under the Non-Financial Reporting Directive								
41	Loans and receivables								
42	Debt securities								
43	Equity instruments								
44	Derivative financial instruments								
45	Interbank call loans								
46	Cash and cash-equivalent assets								
47	Other assets (e.g. goodwill, commodities, etc.)								
48	Total GAR assets	0	0	-	-	-	-	-	-
49	Other assets not included in the GAR calculation								
50	Central governments and supranational issuers								
51	Exposures to central banks								
52	Trading portfolio								
53	Total assets								
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive								
54	Financial guarantees								
55	Assets under management								
56	of which, debt securities								
57	of which, equity instruments								

2. Assets included in the GAR calculation (based on CapEX) - continued

Millions of RON		Reference date for providing information T						
		Circular economy (CE)			Pollution (PPC)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, enabling		of which, use of proceeds	of which, enabling		
	GAR - Assets included in the numerator and denominator							
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	8	-	-	-			
2	Financial undertakings	-	-	-	-			
3	Credit institutions	-	-	-	-			
4	Loans and receivables							
5	Debt securities, including use of proceeds (UoP)							
6	Equity instruments							
7	Other financial corporations							
8	of which, investment firms							
9	Loans and receivables							
10	Debt securities, including use of proceeds (UoP)							
11	Equity instruments							
12	of which, asset management companies							
13	Loans and receivables							
14	Debt securities, including use of proceeds (UoP)							
15	Equity instruments							
16	of which, insurance undertakings							
17	Loans and receivables							
18	Debt securities, including use of proceeds (UoP)							
19	Equity instruments							
20	Non-financial undertakings	8	-	-	-			
21	Loans and receivables	8						
22	Debt securities, including use of proceeds (UoP)							
23	Equity instruments							
24	Households							
25	of which, loans secured by residential real estate							
26	of which, loans for the renovation of buildings							
27	of which, car loans							
28	Financing to local governments							
29	Housing finance							
30	Other forms of financing to local governments							
31	Collateral obtained through possession							
32	Other assets excluded from the numerator (included in the denominator for GAR calculation)							
33	Financial and non-financial undertakings							
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive							
35	Loans and receivables							
36	of which, loans secured by commercial real estate							
37	of which, loans for the renovation of buildings							
38	Debt securities							
39	Equity instruments							
40	Counterparties from non-EU countries not subject to the disclosure requirements under the Non-Financial Reporting Directive							
41	Loans and receivables							
42	Debt securities							
43	Equity instruments							
44	Derivative financial instruments							
45	Interbank call loans							
46	Cash and cash-equivalent assets							
47	Other assets (e.g. goodwill, commodities, etc.)							
48	Total GAR assets	8	-	-	-	-	-	-
49	Other assets not included in the GAR calculation							
50	Central governments and supranational issuers							
51	Exposures to central banks							
52	Trading portfolio							
53	Total assets							
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive							
54	Financial guarantees							
55	Assets under management							
56	of which, debt securities							
57	of which, equity instruments							

2. Assets included in the GAR calculation (based on CapEX) - continued

Millions of RON		Reference date for providing information T			
		Biodiversity and ecosystems (BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)			
			of which, use of proceeds	of which, enabling	
	<u>GAR - Assets included in the numerator and denominator</u>				
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes				
2	Financial undertakings				
3	Credit institutions				
4	Loans and receivables				
5	Debt securities, including use of proceeds (UoP)				
6	Equity instruments				
7	Other financial corporations				
8	of which, investment firms				
9	Loans and receivables				
10	Debt securities, including use of proceeds (UoP)				
11	Equity instruments				
12	of which, asset management companies				
13	Loans and receivables				
14	Debt securities, including use of proceeds (UoP)				
15	Equity instruments				
16	of which, insurance undertakings				
17	Loans and receivables				
18	Debt securities, including use of proceeds (UoP)				
19	Equity instruments				
20	Non-financial undertakings				
21	Loans and receivables				
22	Debt securities, including use of proceeds (UoP)				
23	Equity instruments				
24	Households				
25	of which, loans secured by residential real estate				
26	of which, loans for the renovation of buildings				
27	of which, car loans				
28	Financing to local governments				
29	Housing finance				
30	Other forms of financing to local governments				
31	Collateral obtained through possession				
32	Other assets excluded from the numerator (included in the denominator for GAR calculation)				
33	Financial and non-financial undertakings				
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive				
35	Loans and receivables				
36	of which, loans secured by commercial real estate				
37	of which, loans for the renovation of buildings				
38	Debt securities				
39	Equity instruments				
40	Counterparties from non-EU countries not subject to the disclosure requirements under the Non-Financial Reporting Directive				
41	Loans and receivables				
42	Debt securities				
43	Equity instruments				
44	Derivative financial instruments				
45	Interbank call loans				
46	Cash and cash-equivalent assets				
47	Other assets (e.g. goodwill, commodities, etc.)				
48	Total GAR assets	-	-	-	-
49	Other assets not included in the GAR calculation				
50	Central governments and supranational issuers				
51	Exposures to central banks				
52	Trading portfolio				
53	Total assets				
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive				
54	Financial guarantees				
55	Assets under management				
56	of which, debt securities				
57	of which, equity instruments				

2. Assets included in the GAR calculation (based on CapEX) - continued

Millions of RON		Reference date for providing information T				
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)				
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				
		of which, environmentally sustainable (taxonomy-aligned)				
				of which, use of proceeds	of which, transition	of which, enabling
	<u>GAR - Assets included in the numerator and denominator</u>					
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	974	118	112	111	0
2	Financial undertakings	34	3	0	0	0
3	Credit institutions	34	3	0	0	0
4	Loans and receivables	34	3	0	0	0
5	Debt securities, including use of proceeds (UoP)	-	-	-	-	-
6	Equity instruments	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-
8	of which, investment firms	-	-	-	-	-
9	Loans and receivables	-	-	-	-	-
10	Debt securities, including use of proceeds (UoP)	-	-	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which, asset management companies	-	-	-	-	-
13	Loans and receivables	-	-	-	-	-
14	Debt securities, including use of proceeds (UoP)	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which, insurance undertakings	-	-	-	-	-
17	Loans and receivables	-	-	-	-	-
18	Debt securities, including use of proceeds (UoP)	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	Non-financial undertakings	219	3	-	-	-
21	Loans and receivables	219	3	-	-	-
22	Debt securities, including use of proceeds (UoP)	-	-	-	-	-
23	Equity instruments	-	-	-	-	-
24	Households	714	111	111	111	-
25	of which, loans secured by residential real estate	714	111	111	111	-
26	of which, loans for the renovation of buildings	-	-	-	-	-
27	of which, car loans	-	-	-	-	-
28	Financing to local governments	-	-	-	-	-
29	Housing finance	-	-	-	-	-
30	Other forms of financing to local governments	-	-	-	-	-
31	Collateral obtained through possession	6	0	0	0	-
32	Other assets excluded from the numerator (included in the denominator for GAR calculation)	-	-	-	-	-
33	Financial and non-financial undertakings					
34	SMEs and NFCs (other than SMEs) not subject to the disclosure requirements under the Non-Financial Reporting Directive					
35	Loans and receivables					
36	of which, loans secured by commercial real estate					
37	of which, loans for the renovation of buildings					
38	Debt securities					
39	Equity instruments					
40	Counterparties from non-EU countries not subject to the disclosure requirements under the Non-Financial Reporting Directive					
41	Loans and receivables					
42	Debt securities					
43	Equity instruments					
44	Derivative financial instruments					
45	Interbank call loans					
46	Cash and cash-equivalent assets					
47	Other assets (e.g. goodwill, commodities, etc.)					
48	Total GAR assets	974	118	112	111	0
49	Other assets not included in the GAR calculation					
50	Central governments and supranational issuers					
51	Exposures to central banks					
52	Trading portfolio					
53	Total assets					
	Off-balance sheet exposures - Commercial undertakings subject to the disclosure requirements under the Non-Financial Reporting Directive	86	-	-	-	-
54	Financial guarantees	86	-	-	-	-
55	Assets under management					
56	of which, debt securities					
57	of which, equity instruments					

3. GAR by sectors (based on turnover)

		Reference date for providing information T			
Breakdown by sectors - NACE 4-digit level (code and label)		Climate Change Mitigation (CCM)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable	mil. RON	of which, environmentally sustainable
1	146 - Raising of swine/pigs	4	-		
2	1812 - Other printing activities n.e.c. (not elsewhere classified)	5	-		
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles	13	2		
4	2442 - Aluminium production	415	-		
5	2453 - Casting of light non-ferrous metals	7	-		
6	2599 - Manufacture of other fabricated metal products n.e.c.	0	-		
7	2670 - Manufacture of optical instruments and photographic equipment	0	-		
8	2892 - Manufacture of machinery for mining, quarrying and construction	6	-		
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines	1	-		
10	3600 - Water collection, treatment and supply	57	-		
11	3832 - Recovery of sorted materials	3	-		
12	4675 - Wholesale of chemical products	20	-		
13	4690 - Non-specialised wholesale trade	(0)	-		
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores	3	-		
15	4791 - Retail sale via mail order houses or via internet	3	-		
16	5223 - Service activities incidental to air transportation	74	-		
17	5224 - Cargo handling	47	-		
18	5310 - Postal activities under universal service obligation	23	-		
19	7022 - Business and other management consultancy activities	1	-		
20	7219 - Research and experimental development on natural sciences and engineering (other)	1	-		
21	7219 - Research and experimental development on natural sciences and engineering (other)	4	-		
22	7711 - Rental and leasing of cars and light motor vehicles	10	-		

		Reference date for providing information T			
Breakdown by sectors - NACE 4-digit level (code and label)		Climate Change Adaptation (CCA)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable (CCA)	mil. RON	of which, environmentally sustainable (CCA)
1	146 - Raising of swine/pigs				
2	1812 - Other printing activities n.e.c. (not elsewhere classified)				
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles				
4	2442 - Aluminium production				
5	2453 - Casting of light non-ferrous metals				
6	2599 - Manufacture of other fabricated metal products n.e.c.				
7	2670 - Manufacture of optical instruments and photographic equipment				
8	2892 - Manufacture of machinery for mining, quarrying and construction				
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines				
10	3600 - Water collection, treatment and supply				
11	3832 - Recovery of sorted materials				
12	4675 - Wholesale of chemical products				
13	4690 - Non-specialised wholesale trade				
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores				
15	4791 - Retail sale via mail order houses or via internet				
16	5223 - Service activities incidental to air transportation				
17	5224 - Cargo handling				
18	5310 - Postal activities under universal service obligation				
19	7022 - Business and other management consultancy activities				
20	7219 - Research and experimental development on natural sciences and engineering (other)				
21	7219 - Research and experimental development on natural sciences and engineering (other)				
22	7711 - Rental and leasing of cars and light motor vehicles				

3. GAR by sectors (based on turnover) - continued

		Reference date for providing information T			
Breakdown by sectors - NACE 4-digit level (code and label)		Water and marine resources (WTR)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable	mil. RON	of which, environmentally sustainable (WTR)
1	146 - Raising of swine/pigs				
2	1812 - Other printing activities n.e.c. (not elsewhere classified)				
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles				
4	2442 - Aluminium production				
5	2453 - Casting of light non-ferrous metals				
6	2599 - Manufacture of other fabricated metal products n.e.c.				
7	2670 - Manufacture of optical instruments and photographic equipment				
8	2892 - Manufacture of machinery for mining, quarrying and construction				
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines				
10	3600 - Water collection, treatment and supply				
11	3832 - Recovery of sorted materials				
12	4675 - Wholesale of chemical products				
13	4690 - Non-specialised wholesale trade				
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores				
15	4791 - Retail sale via mail order houses or via internet				
16	5223 - Service activities incidental to air transportation				
17	5224 - Cargo handling				
18	5310 - Postal activities under universal service obligation				
19	7022 - Business and other management consultancy activities				
20	7219 - Research and experimental development on natural sciences and engineering (other)				
21	7219 - Research and experimental development on natural sciences and engineering (other)				
22	7711 - Rental and leasing of cars and light motor vehicles				

		Reference date for providing information T			
Breakdown by sectors - NACE 4-digit level (code and label)		Circular Economy (CE)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable (CE)	mil. RON	of which, environmentally sustainable (CE)
1	146 - Raising of swine/pigs				
2	1812 - Other printing activities n.e.c. (not elsewhere classified)				
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles				
4	2442 - Aluminium production				
5	2453 - Casting of light non-ferrous metals				
6	2599 - Manufacture of other fabricated metal products n.e.c.				
7	2670 - Manufacture of optical instruments and photographic equipment				
8	2892 - Manufacture of machinery for mining, quarrying and construction				
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines				
10	3600 - Water collection, treatment and supply				
11	3832 - Recovery of sorted materials				
12	4675 - Wholesale of chemical products				
13	4690 - Non-specialised wholesale trade				
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores				
15	4791 - Retail sale via mail order houses or via internet				
16	5223 - Service activities incidental to air transportation				
17	5224 - Cargo handling				
18	5310 - Postal activities under universal service obligation				
19	7022 - Business and other management consultancy activities				
20	7219 - Research and experimental development on natural sciences and engineering (other)				
21	7219 - Research and experimental development on natural sciences and engineering (other)				
22	7711 - Rental and leasing of cars and light motor vehicles				

3. GAR by sectors (based on turnover) - continued

Breakdown by sectors - NACE 4-digit level (code and label)		Reference date for providing information T			
		Pollution (PPC)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable (PPC)	mil. RON	of which, environmentally sustainable (PPC)
1	146 - Raising of swine/pigs				
2	1812 - Other printing activities n.e.c. (not elsewhere classified)				
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles				
4	2442 - Aluminium production				
5	2453 - Casting of light non-ferrous metals				
6	2599 - Manufacture of other fabricated metal products n.e.c.				
7	2670 - Manufacture of optical instruments and photographic equipment				
8	2892 - Manufacture of machinery for mining, quarrying and construction				
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines				
10	3600 - Water collection, treatment and supply				
11	3832 - Recovery of sorted materials				
12	4675 - Wholesale of chemical products				
13	4690 - Non-specialised wholesale trade				
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores				
15	4791 - Retail sale via mail order houses or via internet				
16	5223 - Service activities incidental to air transportation				
17	5224 - Cargo handling				
18	5310 - Postal activities under universal service obligation				
19	7022 - Business and other management consultancy activities				
20	7219 - Research and experimental development on natural sciences and engineering (other)				
21	7219 - Research and experimental development on natural sciences and engineering (other)				
22	7711 - Rental and leasing of cars and light motor vehicles				

Breakdown by sectors - NACE 4-digit level (code and label)		Reference date for providing information T			
		Biodiversity and ecosystems (BIO)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable (BIO)	mil. RON	of which, environmentally sustainable (BIO)
1	146 - Raising of swine/pigs				
2	1812 - Other printing activities n.e.c. (not elsewhere classified)				
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles				
4	2442 - Aluminium production				
5	2453 - Casting of light non-ferrous metals				
6	2599 - Manufacture of other fabricated metal products n.e.c.				
7	2670 - Manufacture of optical instruments and photographic equipment				
8	2892 - Manufacture of machinery for mining, quarrying and construction				
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines				
10	3600 - Water collection, treatment and supply				
11	3832 - Recovery of sorted materials				
12	4675 - Wholesale of chemical products				
13	4690 - Non-specialised wholesale trade				
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores				
15	4791 - Retail sale via mail order houses or via internet				
16	5223 - Service activities incidental to air transportation				
17	5224 - Cargo handling				
18	5310 - Postal activities under universal service obligation				
19	7022 - Business and other management consultancy activities				
20	7219 - Research and experimental development on natural sciences and engineering (other)				
21	7219 - Research and experimental development on natural sciences and engineering (other)				
22	7711 - Rental and leasing of cars and light motor vehicles				

3. GAR by sectors (based on turnover) - continued

Breakdown by sectors - NACE 4-digit level (code and label)		Reference date for providing information T			
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount	
		mil. RON	of which, environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)	mil. RON	of which, environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)
1	146 - Raising of swine/pigs	4	-		
2	1812 - Other printing activities n.e.c. (not elsewhere classified)	5	-		
3	2221 - Manufacture of plastic plates, sheets, tubes and profiles	13	2		
4	2442 - Aluminium production	415	-		
5	2453 - Casting of light non-ferrous metals	7	-		
6	2599 - Manufacture of other fabricated metal products n.e.c.	0	-		
7	2670 - Manufacture of optical instruments and photographic equipment	0	-		
8	2892 - Manufacture of machinery for mining, quarrying and construction	6	-		
9	2932 - Manufacture of other parts and accessories for motor vehicles and their engines	1	-		
10	3600 - Water collection, treatment and supply	57	-		
11	3832 - Recovery of sorted materials	3	-		
12	4675 - Wholesale of chemical products	20	-		
13	4690 - Non-specialised wholesale trade	(0)	-		
14	4776 - Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores	3	-		
15	4791 - Retail sale via mail order houses or via internet	3	-		
16	5223 - Service activities incidental to air transportation	74	-		
17	5224 - Cargo handling	47	-		
18	5310 - Postal activities under universal service obligation	23	-		
19	7022 - Business and other management consultancy activities	1	-		
20	7219 - Research and experimental development on natural sciences and engineering (other)	1	-		
21	7219 - Research and experimental development on natural sciences and engineering (other)	4	-		
22	7711 - Rental and leasing of cars and light motor vehicles	10	-		

Breakdown by sectors - NACE 4-digit level (code and label)		Reference date for providing information T-1					
		Circular economy (CE)			Pollution (PPC)		
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial undertakings (subject to the Non-Financial Reporting Directive)	
		Gross carrying amount		Gross carrying amount		Gross carrying amount	
		mil. lei	of which, environmentally sustainable (CE)	mil. lei	of which, environmentally sustainable (CE)	mil. lei	of which, environmentally sustainable
1	0147 - Raising of poultry						
2	0910 - Support activities for petroleum and natural gas extraction						
3	1011 - Processing and preserving of meat						
4	1013 - Manufacture of meat products (including poultry meat)						
5	1061 - Manufacture of grain mill products						
6	1071 - Manufacture of bread; manufacture of fresh pastry goods and cakes						
7	1610 - Sawmilling and planing of wood						
8	1712 - Manufacture of paper and paperboard						
9	2221 - Manufacture of plastic plates, sheets, tubes and profiles						
10	2222 - Manufacture of plastic packing goods						
11	2223 - Manufacture of plastic products for construction						
12	2229 - Manufacture of other plastic products						
13	2410 - Manufacture of basic iron and steel and of ferro-alloys						
14	2442 - Aluminium production						
15	2453 - Casting of light non-ferrous metals						
16	2550 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy						
17	2651 - Manufacture of instruments and appliances for measuring, testing and navigation						
18	2740 - Manufacture of electric lighting equipment						
19	3011 - Building of ships and boats						
20	3103 - Manufacture of mattresses						
21	3109 - Manufacture of other furniture n.e.c.						
22	3314 - Repair of electrical equipment						
23	3513 - Distribution of electricity						
24	3600 - Water collection, treatment and supply						
25	3811 - Collection of non-hazardous waste						
26	4120 - Construction of residential and non-residential buildings						
27	4222 - Construction of utility projects for electricity and telecommunications						
28	4531 - Wholesale trade of motor vehicle parts and accessories						
29	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds						
30	4690 - Non-specialised wholesale trade						
31	4711 - Retail sale in non-specialised stores with food, beverages or tobacco predominating						
32	4754 - Retail sale of electrical household appliances in specialised stores						
33	4941 - Freight transport by road						
34	5310 - Postal activities under universal service obligation						
35	7500 - Veterinary activities						
36	8010 - Private security activities						

3. GAR by sectors (based on turnover) - continued

Breakdown by sectors - NACE 4-digit level (code and label)		Reference date for providing information T-1							
		Biodiversity and ecosystems (BIO)				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
		mil. lei	of which, environmentally sustainable (BIO)	mil. lei	of which, environmentally sustainable (BIO)	mil. lei	of which, environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)	mil. lei	of which, environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)
1	0147 – Raising of poultry					2	-		
2	0910 – Support activities for petroleum and natural gas extraction					196	-		
3	1011 – Processing and preserving of meat					100	-		
4	1013 – Manufacture of meat products (including poultry meat)					121	-		
5	1061 – Manufacture of grain mill products					77	-		
6	1071 – Manufacture of bread; manufacture of fresh pastry goods and cakes					5	-		
7	1610 – Sawmilling and planing of wood					93	-		
8	1712 – Manufacture of paper and paperboard					0	-		
9	2221 – Manufacture of plastic plates, sheets, tubes and profiles					12	2		
10	2222 – Manufacture of plastic packing goods					8	0		
11	2223 – Manufacture of plastic products for construction					108	-		
12	2229 – Manufacture of other plastic products					47	-		
13	2410 – Manufacture of basic iron and steel and of ferro-alloys					9	-		
14	2442 – Aluminium production					381	-		
15	2453 – Casting of light non-ferrous metals					1	-		
16	2550 – Forging, pressing, stamping and roll-forming of metal; powder metallurgy					20	-		
17	2651 – Manufacture of instruments and appliances for measuring, testing and navigation					38	-		
18	2740 – Manufacture of electric lighting equipment					27	-		
19	3011 – Building of ships and boats					9	-		
20	3103 – Manufacture of mattresses					18	-		
21	3109 – Manufacture of other furniture n.e.c.					14	-		
22	3314 – Repair of electrical equipment					7	-		
23	3513 – Distribution of electricity					168	163		
24	3600 – Water collection, treatment and supply					88	-		
25	3811 – Collection of non-hazardous waste					224	-		
26	4120 – Construction of residential and non-residential buildings					217	-		
27	4222 – Construction of utility projects for electricity and telecommunications					51	19		
28	4531 – Wholesale trade of motor vehicle parts and accessories					73	-		
29	4621 – Wholesale of grain, unmanufactured tobacco, seeds and animal feeds					90	-		
30	4690 – Non-specialised wholesale trade					(0)	-		
31	4711 – Retail sale in non-specialised stores with food, beverages or tobacco predominating					83	-		
32	4754 – Retail sale of electrical household appliances in specialised stores					20	-		
33	4941 – Freight transport by road					10	-		
34	5310 – Postal activities under universal service obligation					41	-		
35	7500 – Veterinary activities					48	-		
36	8010 – Private security activities					2	-		

4. GAR by Sectors (based on CapEX)

Breakdown by sectors - NACE 4-digit level (code and label)		Circular economy (CE)				Pollution (PPC)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
		mil. lei	of which, environmentally sustainable (CE)	mil. lei	of which, environmentally sustainable (CE)	mil. lei	of which, environmentally sustainable (PPC)	mil. lei	of which, environmentally sustainable (PPC)
1	0146 – Raising of swine/pigs								
2	1812 – Other printing activities n.e.c.								
3	2221 – Manufacture of plastic plates, sheets, tubes and profiles								
4	2442 – Aluminium production								
5	2453 – Casting of light non-ferrous metals								
6	2599 – Manufacture of other fabricated metal products n.e.c.								
7	2670 – Manufacture of optical instruments and photographic equipment								
8	2892 – Manufacture of machinery for mining, quarrying and construction								
9	2932 – Manufacture of other parts and accessories for motor vehicles and their engines								
10	3600 – Water collection, treatment and supply								
11	3832 – Recovery of sorted materials								
12	4675 – Wholesale of chemical products								
13	4690 – Non-specialised wholesale trade								
14	4776 – Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores								
15	4791 – Retail sale via mail order houses or via Internet								
16	5223 – Service activities incidental to air transportation								
17	5224 – Cargo handling								
18	5310 – Postal activities under universal service obligation								
19	7022 – Business and other management consultancy activities								
20	7219 – Research and experimental development on natural sciences and engineering								
21	7219 – Research and experimental development on natural sciences and engineering								
22	7711 – Rental and leasing of cars and light motor vehicles								

Breakdown by sectors - NACE 4-digit level (code and label)		Biodiversity and ecosystems (BIO)				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial undertakings (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
		mil. lei	of which, environmentally sustainable (BIO)	mil. lei	of which, environmentally sustainable (BIO)	mil. lei	of which, environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)	mil. lei	of which, environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)
1	0146 – Raising of swine/pigs					4	-		
2	1812 – Other printing activities n.e.c.					5	-		
3	2221 – Manufacture of plastic plates, sheets, tubes and profiles					13	3		
4	2442 – Aluminium production					415	-		
5	2453 – Casting of light non-ferrous metals					7	-		
6	2599 – Manufacture of other fabricated metal products n.e.c.					0	-		
7	2670 – Manufacture of optical instruments and photographic equipment					0	-		
8	2892 – Manufacture of machinery for mining, quarrying and construction					6	-		
9	2932 – Manufacture of other parts and accessories for motor vehicles and their engines					1	-		
10	3600 – Water collection, treatment and supply					57	-		
11	3832 – Recovery of sorted materials					3	-		
12	4675 – Wholesale of chemical products					20	-		
13	4690 – Non-specialised wholesale trade					(0)	-		
14	4776 – Retail sale of flowers, plants, seeds, pet animals and pet food in specialised stores					3	-		
15	4791 – Retail sale via mail order houses or via Internet					3	-		
16	5223 – Service activities incidental to air transportation					74	-		
17	5224 – Cargo handling					47	-		
18	5310 – Postal activities under universal service obligation					23	-		
19	7022 – Business and other management consultancy activities					1	-		
20	7219 – Research and experimental development on natural sciences and engineering					1	-		
21	7219 – Research and experimental development on natural sciences and engineering					4	-		
22	7711 – Rental and leasing of cars and light motor vehicles					10	-		

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T								
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
				of which, use of proceeds	of which, transition	of which, enabling			of which, use of proceeds	of which, enabling
	<u>GAR - Assets included in the numerator and denominator</u>									
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	18,98%	1,81%	1,65%	1,60%	0,02%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	19,81%	1,13%	0,30%	0,05%	0,11%	0,02%	0,00%	0,00%	0,00%
3	Credit institutions	19,81%	1,13%	0,30%	0,05%	0,11%	0,02%	0,00%	0,00%	0,00%
4	Loans and receivables	19,81%	1,13%	0,30%	0,05%	0,11%	0,02%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)									
6	Equity instruments									
7	Other financial corporations									
8	of which, investment firms									
9	Loans and receivables									
10	Debt securities, including use of proceeds (UoP)									
11	Equity instruments									
12	of which, asset management companies									
13	Loans and receivables									
14	Debt securities, including use of proceeds (UoP)									
15	Equity instruments									
16	of which, insurance undertakings									
17	Loans and receivables									
18	Debt securities, including use of proceeds (UoP)									
19	Equity instruments									
20	Non-financial undertakings	11,66%	0,05%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and receivables	11,66%	0,05%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)									
23	Equity instruments									
24	Households	22,87%	3,56%	3,56%	3,56%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate	100,00%	15,56%	15,56%	15,56%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which, loans for the renovation of buildings									
27	of which, car loans									
28	Financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance									
30	Other forms of financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through possession: residential and commercial real estate	100,00%	3,79%	3,79%	3,79%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	7,69%	0,73%	0,67%	0,65%	0,01%	0,00%	0,00%	0,00%	0,00%

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		of which, use of proceeds	of which, enabling	Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		of which, use of proceeds	of which, enabling
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	0,00%	0,00%	0,00%	0,00%	0,12%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial corporations								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings					0,26%	0,00%	0,00%	0,00%
21	Loans and receivables					0,26%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households					0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate					0,00%	0,00%	0,00%	0,00%
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through possession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,05%	0,00%	0,00%	0,00%

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial corporations								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings								
21	Loans and receivables								
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through possession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T					
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					Proportion of total covered assets
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					
			of which, use of proceeds	of which, transition	of which, enabling		
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	19,10%	1,81%	1,65%	1,60%	0,02%	25,64%
2	Financial undertakings	19,83%	1,13%	0,30%	0,05%	0,11%	4,46%
3	Credit institutions	19,83%	1,13%	0,30%	0,05%	0,11%	4,46%
4	Loans and receivables	19,83%	1,13%	0,30%	0,05%	0,11%	4,46%
5	Debt securities, including use of proceeds (UoP)						0,00%
6	Equity instruments						0,00%
7	Other financial corporations						0,00%
8	of which, investment firms						0,00%
9	Loans and receivables						0,00%
10	Debt securities, including use of proceeds (UoP)						0,00%
11	Equity instruments						0,00%
12	of which, asset management companies						0,00%
13	Loans and receivables						0,00%
14	Debt securities, including use of proceeds (UoP)						0,00%
15	Equity instruments						0,00%
16	of which, insurance undertakings						0,00%
17	Loans and receivables						0,00%
18	Debt securities, including use of proceeds (UoP)						0,00%
19	Equity instruments						0,00%
20	Non-financial undertakings	11,92%	0,05%	0,00%	0,00%	0,00%	2,55%
21	Loans and receivables	11,92%	0,05%	0,00%	0,00%	0,00%	2,55%
22	Debt securities, including use of proceeds (UoP)						0,00%
23	Equity instruments						0,00%
24	Households	22,87%	3,56%	3,56%	3,56%	0,00%	11,47%
25	of which, loans secured by residential real estate	100,00%	15,56%	15,56%	15,56%	0,00%	2,62%
26	of which, loans for the renovation of buildings						0,00%
27	of which, car loans						0,00%
28	Financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	7,13%
29	Housing finance						0,00%
30	Other forms of financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	7,13%
31	Collateral obtained through possession: residential and commercial real estate	100,00%	3,79%	3,79%	3,79%	0,00%	0,02%
32	Total GAR assets	7,73%	0,73%	0,67%	0,65%	0,01%	63,30%

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1									
		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)						Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)						Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					
of which, use of proceeds						of which, use of proceeds					
of which, transition						of which, enabling					
of which, enabling						of which, enabling					
	GAR - Assets included in the numerator and denominator										
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	16,93%	3,55%	1,46%	1,46%	0,00%	-	-	-	-	
2	Financial undertakings	12,68%	0,27%	0,00%	0,00%	0,00%	-	-	-	-	
3	Credit institutions	12,68%	0,27%	0,00%	0,00%	0,00%	-	-	-	-	
4	Loans and receivables	13,18%	0,28%	0,00%	0,00%	0,00%	-	-	-	-	
5	Debt securities, including use of proceeds (UoP)	0,06%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	
6	Equity instruments										
7	Other financial corporations										
8	of which, investment firms										
9	Loans and receivables										
10	Debt securities, including use of proceeds (UoP)										
11	Equity instruments										
12	of which, asset management companies										
13	Loans and receivables										
14	Debt securities, including use of proceeds (UoP)										
15	Equity instruments										
16	of which, insurance undertakings										
17	Loans and receivables										
18	Debt securities, including use of proceeds (UoP)										
19	Equity instruments										
20	Non-financial undertakings	20,61%	7,64%	0,00%	0,00%	0,00%	-	-	-	-	
21	Loans and receivables	20,61%	7,64%	0,00%	0,00%	0,00%	-	-	-	-	
22	Debt securities, including use of proceeds (UoP)										
23	Equity instruments										
24	Households	24,80%	3,85%	3,85%	3,85%	0,00%	-	-	-	-	
25	of which, loans secured by residential real estate	100,00%	15,54%	15,54%	15,54%	0,00%	-	-	-	-	
26	of which, loans for the renovation of buildings										
27	of which, car loans										
28	Financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	
29	Housing finance										
30	Other forms of financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	
31	Collateral obtained through possession: residential and commercial real estate	100,00%	16,51%	16,51%	16,51%	0,00%	-	-	-	-	
32	Total GAR assets	9,06%	1,90%	0,78%	0,78%	0,00%	0,00%	0,00%	0,00%	0,00%	

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-
4	Loans and receivables	-	-	-	-	-	-	-	-
5	Debt securities, including use of proceeds (UoP)	-	-	-	-	-	-	-	-
6	Equity instruments								
7	Other financial corporations								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings	-	-	-	-	-	-	-	-
21	Loans and receivables	-	-	-	-	-	-	-	-
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households					-	-	-	-
25	of which, loans secured by residential real estate					-	-	-	-
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing to local governments	-	-	-	-	-	-	-	-
29	Housing finance								
30	Other forms of financing to local governments	-	-	-	-	-	-	-	-
31	Collateral obtained through possession: residential and commercial real estate	-	-	-	-	-	-	-	-
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	-	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-
4	Loans and receivables	-	-	-	-	-	-	-	-
5	Debt securities, including use of proceeds (UoP)	-	-	-	-	-	-	-	-
6	Equity instruments								
7	Other financial corporations								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings	-	-	-	-	-	-	-	-
21	Loans and receivables	-	-	-	-	-	-	-	-
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing to local governments	-	-	-	-	-	-	-	-
29	Housing finance								
30	Other forms of financing to local governments	-	-	-	-	-	-	-	-
31	Collateral obtained through possession: residential and commercial real estate	-	-	-	-	-	-	-	-
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

5. ICP GAR on stock (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1					
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					Proportion of total covered assets
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					
			of which, use of proceeds	of which transition	of which, enabling		
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading purposes	16,93%	3,55%	1,46%	1,46%	0,00%	33,09%
2	Financial undertakings	12,68%	0,27%	0,00%	0,00%	0,00%	5,28%
3	Credit institutions	12,68%	0,27%	0,00%	0,00%	0,00%	5,28%
4	Loans and receivables	13,18%	0,28%	0,00%	0,00%	0,00%	5,08%
5	Debt securities, including use of proceeds (UoP)	0,06%	0,00%	0,00%	0,00%	0,00%	0,20%
6	Equity instruments						0,00%
7	Other financial corporations						0,00%
8	of which, investment firms						0,00%
9	Loans and receivables						0,00%
10	Debt securities, including use of proceeds (UoP)						0,00%
11	Equity instruments						0,00%
12	of which, asset management companies						0,00%
13	Loans and receivables						0,00%
14	Debt securities, including use of proceeds (UoP)						0,00%
15	Equity instruments						0,00%
16	of which, insurance undertakings						0,00%
17	Loans and receivables						0,00%
18	Debt securities, including use of proceeds (UoP)						0,00%
19	Equity instruments						0,00%
20	Non-financial undertakings	20,61%	7,64%	0,00%	0,00%	0,00%	8,90%
21	Loans and receivables	20,61%	7,64%	0,00%	0,00%	0,00%	8,90%
22	Debt securities, including use of proceeds (UoP)						0,00%
23	Equity instruments						0,00%
24	Households	24,80%	3,85%	3,85%	3,85%	0,00%	12,41%
25	of which, loans secured by residential real estate	100,00%	15,54%	15,54%	15,54%	0,00%	3,08%
26	of which, loans for the renovation of buildings						0,00%
27	of which, car loans						0,00%
28	Financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	6,48%
29	Housing finance						0,00%
30	Other forms of financing to local governments	0,00%	0,00%	0,00%	0,00%	0,00%	6,48%
31	Collateral obtained through possession: residential and commercial real estate	100,00%	16,51%	16,51%	16,51%	0,00%	0,02%
32	Total GAR assets	9,06%	1,90%	0,78%	0,78%	0,00%	61,88%

6. ICP GAR on stock (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T								
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
				of which, use of proceeds	of which, transition	of which, enabling			of which, use of proceeds	of which, enabling
	GAR - Assets included in the numerator and denominator									
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading	13,82%	1,68%	1,60%	1,60%	0,01%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	2,76%	0,28%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%
3	Credit institutions	2,76%	0,28%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%
4	Loans and receivables	2,76%	0,28%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)									
6	Equity instruments									
7	Other financial undertakings									
8	of which, investment firms									
9	Loans and receivables									
10	Debt securities, including use of proceeds (UoP)									
11	Equity instruments									
12	of which, asset management companies									
13	Loans and receivables									
14	Debt securities, including use of proceeds (UoP)									
15	Equity instruments									
16	of which, insurance undertakings									
17	Loans and receivables									
18	Debt securities, including use of proceeds (UoP)									
19	Equity instruments									
20	Non-financial undertakings	6,75%	0,09%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and receivables	6,75%	0,09%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)									
23	Equity instruments									
24	Households	22,87%	3,56%	3,56%	3,56%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate	100,00%	15,56%	15,56%	15,56%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which, loans for the renovation of buildings									
27	of which, car loans									
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance									
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	3,79%	3,79%	3,79%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	5,60%	0,68%	0,65%	0,65%	0,00%	0,00%	0,00%	0,00%	0,00%

6. ICP GAR on stock (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)	
				of which, use of proceeds	of which, enabling			of which, use of proceeds	of which, enabling
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading	0,00%	0,00%	0,00%	0,00%	0,12%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings					0,26%	0,00%	0,00%	0,00%
21	Loans and receivables					0,26%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households					0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate					0,00%	0,00%	0,00%	0,00%
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,05%	0,00%	0,00%	0,00%

6. ICP GAR on stock (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)	
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
GAR - Assets included in the numerator and denominator									
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings								
21	Loans and receivables								
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

6. ICP GAR on stock (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T					
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)					Proportion of total covered assets
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			of which, use of proceeds	of which, transition	
GAR - Assets included in the numerator and denominator							
1	Loans and receivables, debt securities and equity instruments not eligible for GAR calculation due to high-frequency trading	13,94%	1,69%	1,60%	1,60%	0,01%	25,64%
2	Financial undertakings	2,77%	0,28%	0,01%	0,01%	0,04%	4,46%
3	Credit institutions	2,77%	0,28%	0,01%	0,01%	0,04%	4,46%
4	Loans and receivables	2,77%	0,28%	0,01%	0,01%	0,04%	4,46%
5	Debt securities, including use of proceeds (UoP)						0,00%
6	Equity instruments						0,00%
7	Other financial undertakings						0,00%
8	of which, investment firms						0,00%
9	Loans and receivables						0,00%
10	Debt securities, including use of proceeds (UoP)						0,00%
11	Equity instruments						0,00%
12	of which, asset management companies						0,00%
13	Loans and receivables						0,00%
14	Debt securities, including use of proceeds (UoP)						0,00%
15	Equity instruments						0,00%
16	of which, insurance undertakings						0,00%
17	Loans and receivables						0,00%
18	Debt securities, including use of proceeds (UoP)						0,00%
19	Equity instruments						0,00%
20	Non-financial undertakings	7,01%	0,09%	0,00%	0,00%	0,00%	2,55%
21	Loans and receivables	7,01%	0,09%	0,00%	0,00%	0,00%	2,55%
22	Debt securities, including use of proceeds (UoP)						0,00%
23	Equity instruments						0,00%
24	Households	22,87%	3,56%	3,56%	3,56%	0,00%	11,47%
25	of which, loans secured by residential real estate	100,00%	15,56%	15,56%	15,56%	0,00%	2,62%
26	of which, loans for the renovation of buildings						0,00%
27	of which, car loans						0,00%
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	7,13%
29	Housing finance						0,00%
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	7,13%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	3,79%	3,79%	3,79%	0,00%	0,02%
32	Total GAR assets	5,64%	0,68%	0,65%	0,65%	0,00%	63,30%

7. ICP GAR on flow (based on turnover)

% (relative to the total covered assets in the denominator)		Reference date for providing information T								
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)					of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)					of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, transition	of which, enabling			of which, use of proceeds	of which, enabling		
	GAR - Assets included in the numerator and denominator									
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	9,30%	0,43%	0,24%	0,18%	0,05%	0,04%	0,01%	0,00%	0,00%
2	Financial undertakings	7,56%	0,33%	0,09%	0,01%	0,06%	0,05%	0,01%	0,00%	0,00%
3	Credit institutions	7,56%	0,33%	0,09%	0,01%	0,06%	0,05%	0,01%	0,00%	0,00%
4	Loans and receivables	7,56%	0,33%	0,09%	0,01%	0,06%	0,05%	0,01%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)									
6	Equity instruments									
7	Other financial undertakings									
8	of which, investment firms									
9	Loans and receivables									
10	Debt securities, including use of proceeds (UoP)									
11	Equity instruments									
12	of which, asset management companies									
13	Loans and receivables									
14	Debt securities, including use of proceeds (UoP)									
15	Equity instruments									
16	of which, insurance undertakings									
17	Loans and receivables									
18	Debt securities, including use of proceeds (UoP)									
19	Equity instruments									
20	Non-financial undertakings	12,52%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and receivables	12,52%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)									
23	Equity instruments									
24	Households	7,53%	1,01%	1,01%	1,01%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate	100,00%	13,46%	13,46%	13,46%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which, loans for building renovation									
27	of which, car loans									
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance									
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	4,42%	0,20%	0,11%	0,09%	0,02%	0,02%	0,00%	0,00%	0,00%

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings					0,00%	0,00%	0,00%	0,00%
21	Loans and receivables					0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households					0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate					0,00%	0,00%	0,00%	0,00%
26	of which, loans for building renovation								
27	of which, car loans								
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
			of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings								
21	Loans and receivables								
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for building renovation								
27	of which, car loans								
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T					
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					Proportion of total covered assets
		of which, to taxonomy-relevant sectors (taxonomy-eligible)					
		of which, environmentally sustainable (taxonomy-aligned)					
				of which, use of proceeds	of which transition	of which, enabling	
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	9,34%	0,44%	0,24%	0,18%	0,05%	24,58%
2	Financial undertakings	7,61%	0,34%	0,09%	0,01%	0,06%	19,13%
3	Credit institutions	7,61%	0,34%	0,09%	0,01%	0,06%	19,13%
4	Loans and receivables	7,61%	0,34%	0,09%	0,01%	0,06%	19,13%
5	Debt securities, including use of proceeds (UoP)						0,00%
6	Equity instruments						0,00%
7	Other financial undertakings						0,00%
8	of which, investment firms						0,00%
9	Loans and receivables						0,00%
10	Debt securities, including use of proceeds (UoP)						0,00%
11	Equity instruments						0,00%
12	of which, asset management companies						0,00%
13	Loans and receivables						0,00%
14	Debt securities, including use of proceeds (UoP)						0,00%
15	Equity instruments						0,00%
16	of which, insurance undertakings						0,00%
17	Loans and receivables						0,00%
18	Debt securities, including use of proceeds (UoP)						0,00%
19	Equity instruments						0,00%
20	Non-financial undertakings	12,52%	0,00%	0,00%	0,00%	0,00%	0,61%
21	Loans and receivables	12,52%	0,00%	0,00%	0,00%	0,00%	0,61%
22	Debt securities, including use of proceeds (UoP)						0,00%
23	Equity instruments						0,00%
24	Households	7,53%	1,01%	1,01%	1,01%	0,00%	4,13%
25	of which, loans secured by residential real estate	100,00%	13,46%	13,46%	13,46%	0,00%	0,31%
26	of which, loans for building renovation						0,00%
27	of which, car loans						0,00%
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,69%
29	Housing finance						0,00%
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,69%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	0,00%	0,00%	0,00%	0,00%	0,01%
32	Total GAR assets	4,44%	0,21%	0,11%	0,09%	0,02%	51,75%

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1							
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)		
		of which, to taxonomy-relevant sectors (taxonomy-eligible)					of which, to taxonomy-relevant sectors (taxonomy-eligible)		
		of which, environmentally sustainable (taxonomy-aligned)					of which, environmentally sustainable (taxonomy-aligned)		
		of which, use of proceeds	of which, transition	of which, enabling			of which, use of proceeds	of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	16,49%	0,80%	0,13%	0,13%	0,00%			
2	Financial undertakings	15,55%	0,19%	0,00%	0,00%	0,00%			
3	Credit institutions	15,55%	0,19%	0,00%	0,00%	0,00%			
4	Loans and receivables	15,60%	0,19%	0,00%	0,00%	0,00%			
5	Debt securities, including use of proceeds (UoP)	0,06%	0,00%	0,00%	0,00%	0,00%			
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%			
7	Other financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%			
8	of which, investment firms	0,00%	0,00%	0,00%	0,00%	0,00%			
9	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%			
10	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%			
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%			
12	of which, asset management companies	0,00%	0,00%	0,00%	0,00%	0,00%			
13	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%			
14	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%			
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%			
16	of which, insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%			
17	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%			
18	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%			
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%			
20	Non-financial undertakings	27,55%	1,85%	0,00%	0,00%	0,00%			
21	Loans and receivables	27,55%	1,85%	0,00%	0,00%	0,00%			
22	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%			
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%			
24	Households	6,49%	0,56%	0,56%	0,56%	0,00%			
25	of which, loans secured by residential real estate	100,00%	8,58%	8,58%	8,58%	0,00%			
26	of which, loans for building renovation	0,00%	0,00%	0,00%	0,00%	0,00%			
27	of which, car loans	0,00%	0,00%	0,00%	0,00%	0,00%			
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%			
29	Housing finance	0,00%	0,00%	0,00%	0,00%	0,00%			
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%			
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	44,35%	44,35%	44,35%	0,00%			
32	Total GAR assets	7,51%	0,37%	0,06%	0,06%	0,00%			

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.								
2	Financial undertakings								
3	Credit institutions								
4	Loans and receivables								
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings								
21	Loans and receivables								
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for building renovation								
27	of which, car loans								
28	Financing for local administrations								
29	Housing finance								
30	Other forms of financing for local administrations								
31	Collateral obtained through repossession: residential and commercial real estate								
32	Total GAR assets								

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.								
2	Financial undertakings								
3	Credit institutions								
4	Loans and receivables								
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings								
21	Loans and receivables								
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for building renovation								
27	of which, car loans								
28	Financing for local administrations								
29	Housing finance								
30	Other forms of financing for local administrations								
31	Collateral obtained through repossession: residential and commercial real estate								
32	Total GAR assets								

7. ICP GAR on flow (based on turnover) - continued

% (relative to the total covered assets in the denominator)		Reference date for providing information T-1					
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					Proportion of total covered assets
		of which, to taxonomy-relevant sectors (taxonomy-eligible)					
		of which, environmentally sustainable (taxonomy-aligned)					
				of which, use of proceeds	of w ich transition	of which, enabling	
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	16,49%	0,80%	0,13%	0,13%	0,00%	29,81%
2	Financial undertakings	15,55%	0,19%	0,00%	0,00%	0,00%	12,18%
3	Credit institutions	15,55%	0,19%	0,00%	0,00%	0,00%	12,18%
4	Loans and receivables	15,60%	0,19%	0,00%	0,00%	0,00%	12,14%
5	Debt securities, including use of proceeds (UoP)	0,06%	0,00%	0,00%	0,00%	0,00%	0,04%
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7	Other financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	of which, investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	of which, asset management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	of which, insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20	Non-financial undertakings	27,55%	1,85%	0,00%	0,00%	0,00%	9,55%
21	Loans and receivables	27,55%	1,85%	0,00%	0,00%	0,00%	9,55%
22	Debt securities, including use of proceeds (UoP)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
24	Households	6,49%	0,56%	0,56%	0,56%	0,00%	5,76%
25	of which, loans secured by residential real estate	100,00%	8,58%	8,58%	8,58%	0,00%	0,37%
26	of which, loans for building renovation	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which, car loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	2,30%
29	Housing finance	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	2,30%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	44,35%	44,35%	44,35%	0,00%	0,01%
32	Total GAR assets	7,51%	0,37%	0,06%	0,06%	0,00%	65,41%

8. ICP GAR on flow (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T								
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)					of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)					of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, transition	of which, enabling			of which, use of proceeds	of which, enabling		
	GAR - Assets included in the numerator and denominator									
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	24,00%	0,55%	0,24%	0,18%	0,11%	0,02%	0,00%	0,00%	0,00%
2	Financial undertakings	7,66%	0,49%	0,09%	0,02%	0,14%	0,02%	0,00%	0,00%	0,00%
3	Credit institutions	7,66%	0,49%	0,09%	0,02%	0,14%	0,02%	0,00%	0,00%	0,00%
4	Loans and receivables	7,66%	0,49%	0,09%	0,02%	0,14%	0,02%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)									
6	Equity instruments									
7	Other financial undertakings									
8	of which, investment firms									
9	Loans and receivables									
10	Debt securities, including use of proceeds (UoP)									
11	Equity instruments									
12	of which, asset management companies									
13	Loans and receivables									
14	Debt securities, including use of proceeds (UoP)									
15	Equity instruments									
16	of which, insurance undertakings									
17	Loans and receivables									
18	Debt securities, including use of proceeds (UoP)									
19	Equity instruments									
20	Non-financial undertakings	7,12%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and receivables	7,12%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)									
23	Equity instruments									
24	Households	100,00%	1,01%	1,01%	1,01%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate	100,00%	13,46%	13,46%	13,46%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which, loans for the renovation of buildings									
27	of which, car loans									
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance									
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	11,10%	0,25%	0,11%	0,09%	0,05%	0,01%	0,00%	0,00%	0,00%

8. ICP GAR on flow (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings					0,00%	0,00%	0,00%	0,00%
21	Loans and receivables					0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households					0,00%	0,00%	0,00%	0,00%
25	of which, loans secured by residential real estate					0,00%	0,00%	0,00%	0,00%
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

8. ICP GAR on flow (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds		of which, enabling		of which, use of proceeds		of which, enabling	
	GAR - Assets included in the numerator and denominator								
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and receivables	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
5	Debt securities, including use of proceeds (UoP)								
6	Equity instruments								
7	Other financial undertakings								
8	of which, investment firms								
9	Loans and receivables								
10	Debt securities, including use of proceeds (UoP)								
11	Equity instruments								
12	of which, asset management companies								
13	Loans and receivables								
14	Debt securities, including use of proceeds (UoP)								
15	Equity instruments								
16	of which, insurance undertakings								
17	Loans and receivables								
18	Debt securities, including use of proceeds (UoP)								
19	Equity instruments								
20	Non-financial undertakings								
21	Loans and receivables								
22	Debt securities, including use of proceeds (UoP)								
23	Equity instruments								
24	Households								
25	of which, loans secured by residential real estate								
26	of which, loans for the renovation of buildings								
27	of which, car loans								
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing finance								
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained through repossession: residential and commercial real estate	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

8. ICP GAR on flow (based on CapEX)

% (relative to the total covered assets in the denominator)		Reference date for providing information T					
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					Proportion of total covered assets
		of which, to taxonomy-relevant sectors (taxonomy-eligible)					
		of which, environmentally sustainable (taxonomy-aligned)					
				of which, use of proceeds	of which, transition	of which, enabling	
	GAR - Assets included in the numerator and denominator						
1	Loans and receivables, debt securities, and equity instruments not eligible for GAR calculation due to high-frequency trading.	24,02%	0,55%	0,24%	0,18%	0,11%	24,24%
2	Financial undertakings	7,68%	0,49%	0,09%	0,02%	0,14%	18,87%
3	Credit institutions	7,68%	0,49%	0,09%	0,02%	0,14%	18,87%
4	Loans and receivables	7,68%	0,49%	0,09%	0,02%	0,14%	18,87%
5	Debt securities, including use of proceeds (UoP)						0,00%
6	Equity instruments						0,00%
7	Other financial undertakings						0,00%
8	of which, investment firms						0,00%
9	Loans and receivables						0,00%
10	Debt securities, including use of proceeds (UoP)						0,00%
11	Equity instruments						0,00%
12	of which, asset management companies						0,00%
13	Loans and receivables						0,00%
14	Debt securities, including use of proceeds (UoP)						0,00%
15	Equity instruments						0,00%
16	of which, insurance undertakings						0,00%
17	Loans and receivables						0,00%
18	Debt securities, including use of proceeds (UoP)						0,00%
19	Equity instruments						0,00%
20	Non-financial undertakings	7,12%	0,00%	0,00%	0,00%	0,00%	0,61%
21	Loans and receivables	7,12%	0,00%	0,00%	0,00%	0,00%	0,61%
22	Debt securities, including use of proceeds (UoP)						0,00%
23	Equity instruments						0,00%
24	Households	100,00%	1,01%	1,01%	1,01%	0,00%	4,07%
25	of which, loans secured by residential real estate	100,00%	13,46%	13,46%	13,46%	0,00%	0,31%
26	of which, loans for the renovation of buildings						0,00%
27	of which, car loans						0,00%
28	Financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,68%
29	Housing finance						0,00%
30	Other forms of financing for local administrations	0,00%	0,00%	0,00%	0,00%	0,00%	0,68%
31	Collateral obtained through repossession: residential and commercial real estate	100,00%	0,00%	0,00%	0,00%	0,00%	0,01%
32	Total GAR assets	11,11%	0,25%	0,11%	0,09%	0,05%	52,41%

9. ICP off-balance sheet exposures (based on turnover)

%(relative to total eligible off-balance sheet assets)		Reference date for providing information T							
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1	Financial guarantees (ICP Financial Guarantees)	45,5%	0,0%	0,0%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (ICP Assets under Management)								
	of which, debt securities								
	of which, equity instruments								

%(relative to total eligible off-balance sheet assets)		Reference date for providing information T							
		Water and Marine Resources (WTR)				Circular Economy (CE)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1	Financial guarantees (ICP Financial Guarantees)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (ICP Assets under Management)								
	of which, debt securities								
	of which, equity instruments								

%(relative to total eligible off-balance sheet assets)		Reference date for providing information T							
		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
		of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
		of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1	Financial guarantees (ICP Financial Guarantees)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (ICP Assets under Management)								
	of which, debt securities								
	of which, equity instruments								

%(relative to total eligible off-balance sheet assets)		Reference date for providing information T							
		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)							
		of which, to taxonomy-relevant sectors (taxonomy-eligible)							
		of which, environmentally sustainable (taxonomy-aligned)							
		of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1	Financial guarantees (ICP Financial Guarantees)	45,5%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	Assets under management (ICP Assets under Management)								
	of which, debt securities								
	of which, equity instruments								

10. ICP off-balance sheet exposed (based on CapEX)

% (relative to total eligible off-balance sheet assets)	Reference date for providing information T							
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
	of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
	of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1 Financial guarantees (ICP Financial Guarantees)	32,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2 Assets under management (ICP Assets under Management)								
of which, debt securities								
of which, equity instruments								

% (relative to total eligible off-balance sheet assets)	Reference date for providing information T							
	Water and Marine Resources (WTR)				Circular Economy (CE)			
	of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
	of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
	of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1 Financial guarantees (ICP Financial Guarantees)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2 Assets under management (ICP Assets under Management)								
of which, debt securities								
of which, equity instruments								

% (relative to total eligible off-balance sheet assets)	Reference date for providing information T							
	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	of which, to taxonomy-relevant sectors (taxonomy-eligible)				of which, to taxonomy-relevant sectors (taxonomy-eligible)			
	of which, environmentally sustainable (taxonomy-aligned)				of which, environmentally sustainable (taxonomy-aligned)			
	of which, use of proceeds	of which, transition	of which, enabling		of which, use of proceeds	of which, transition	of which, enabling	
1 Financial guarantees (ICP Financial Guarantees)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2 Assets under management (ICP Assets under Management)								
of which, debt securities								
of which, equity instruments								

% (relative to total eligible off-balance sheet assets)	Reference date for providing information T				
	TOTAL (CCM+CCA+WTR+CE+PPC+BIO)				
	of which, to taxonomy-relevant sectors (taxonomy-eligible)				
	of which, environmentally sustainable (taxonomy-aligned)				
	of which, use of proceeds	of which, transition	of which, enabling		
1 Financial guarantees (ICP Financial Guarantees)	32,1%	0,00%	0,00%	0,00%	0,00%
2 Assets under management (ICP Assets under Management)					
of which, debt securities					
of which, equity instruments					

Standard model for providing the information referred to in Article 8(6) and (7) of Delegated Regulation (EU) 2021/2139 concerning economic activities in certain energy sectors in accordance with Annex XII of Delegated Regulation (EU) 2021/2178

Model 1 Nuclear and Fossil Activities

Row	Nuclear Energy Activities	
1	The undertaking conducts, finances or has exposures to research, development, demonstration, and deployment of innovative electricity generation installations that produce energy from nuclear processes with minimal waste generated from the fuel cycle.	NO
2	The undertaking conducts, finances or has exposures to the construction and safe operation of new nuclear installations for electricity or process heat production, including for district heating or industrial processes such as hydrogen production, as well as their safety-related upgrades using the best available technologies.	NO
3	The undertaking conducts, finances or has exposures to the safe operation of existing nuclear installations producing electricity or process heat, including for district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety-related upgrades.	NO
	Fossil Gas Activities	
4	The undertaking conducts, finances or has exposures to the construction or operation of electricity generation installations producing electricity using fossil gaseous fuels.	YES
5	The undertaking conducts, finances or has exposures to the construction, refurbishment, and operation of installations combining heat for heating/cooling and electricity production using fossil gaseous fuels.	NO
6	The undertaking conducts, finances or has exposures to the construction, refurbishment, and operation of thermal energy production installations for heating/cooling using fossil gaseous fuels.	NO

Model 2 – Taxonomy – Aligned Economic Activities (Denominator)

Row	Economic Activities	Value and proportion (information presented in monetary amounts and percentages)					
		CCM + ACC		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Value (mil. RON)	%	Value (mil. RON)	%	Value (mil. RON)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
2	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
3	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
4	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
5	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
6	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	Value and proportion of other taxonomy-aligned economic activities not mentioned in rows 1–6 above in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total applicable KPI	-	-	-	-	-	-

Model 3 Taxonomy – Aligned Economic Activities (numerator)

Row	Economic Activities	Value and proportion (information presented in monetary amounts and percentages)					
		CCM + ACC		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Value (mil. RON)	%	Value (mil. RON)	%	Value (mil. RON)	%
1	Value and proportion of the economic activity aligned with the taxonomy referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the numerator of the applicable key performance indicator	-	-	-	-	-	-
2	Value and proportion of the economic activity aligned with the taxonomy referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the numerator of the applicable key performance indicator	-	-	-	-	-	-
3	Value and proportion of the economic activity aligned with the taxonomy referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the numerator of the applicable key performance indicator	-	-	-	-	-	-
4	Value and proportion of the economic activity aligned with the taxonomy referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the numerator of the applicable key performance indicator	-	-	-	-	-	-
5	Value and proportion of the economic activity aligned with the taxonomy referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the numerator of the applicable key performance indicator	-	-	-	-	-	-
6	Value and proportion of the economic activity aligned with the taxonomy referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the numerator of the applicable key performance indicator	-	-	-	-	-	-
7	Value and proportion of other economic activities aligned with the taxonomy not mentioned on rows 1–6 above at the numerator of the applicable key performance indicator	-	-	-	-	-	-
8	Total value and proportion of the economic activities aligned with the taxonomy at the numerator of the applicable key performance indicator	-	-	-	-	-	-

Model 4 – Taxonomy – eligible but non-aligned economic activities

Row	Economic Activities	Proportion (information presented in monetary amounts and percentages)					
		(CCM+CCA)		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Value (mil. RON)	%	Value (mil. RON)	%	Value (mil. RON)	%
1	Value and proportion of taxonomy-eligible but non-aligned economic activity mentioned in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the denominator of the applicable key performance indicator	-	-	-	-	-	-
2	Value and proportion of taxonomy-eligible but non-aligned economic activity mentioned in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the denominator of the applicable key performance indicator	-	-	-	-	-	-
3	Value and proportion of taxonomy-eligible but non-aligned economic activity mentioned in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the denominator of the applicable key performance indicator	-	-	-	-	-	-
4	Value and proportion of taxonomy-eligible but non-aligned economic activity mentioned in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the denominator of the applicable key performance indicator	0.20	100%	0.20	100%	-	-
5	Value and proportion of taxonomy-eligible but non-aligned economic activity mentioned in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the denominator of the applicable key performance indicator	-	-	-	-	-	-
6	Value and proportion of taxonomy-eligible but non-aligned economic activity mentioned in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 at the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	Value and proportion of other taxonomy-eligible but non-aligned economic activities not listed in rows 1–6 above at the denominator of the applicable key performance indicator	-	-	-	-	-	-
8	Total value and proportion of taxonomy-eligible but non-aligned economic activities at the numerator of the applicable key performance indicator.	-	-	-	-	-	-

Model 5 – Taxonomy – non-eligible economic activities

Row	Economic Activities	Value (mil. RON)	Percentage
1	Value and proportion of the economic activity mentioned in row 1 of Model 1 that is non-eligible under the taxonomy in accordance with Section 4.26 of Annexes I and II of Delegated Regulation 2021/2139 at the denominator of the applicable key performance indicator	-	-
2	Value and proportion of the economic activity mentioned in row 2 of Model 1 that is non-eligible under the taxonomy in accordance with section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 at the denominator of the applicable key performance indicator	-	-
3	Value and proportion of the economic activity mentioned in row 3 of Model 1 that is non-eligible under the taxonomy in accordance with section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 at the denominator of the applicable key performance indicator	-	-
4	Value and proportion of the economic activity mentioned in row 4 of Model 1 that is non-eligible under the taxonomy in accordance with section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 at the denominator of the applicable key performance indicator	-	-
5	Value and proportion of the economic activity mentioned in row 5 of Model 1 that is non-eligible under the taxonomy in accordance with section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 at the denominator of the applicable key performance indicator	-	-
6	Value and proportion of the economic activity mentioned in row 6 of Model 1 that is non-eligible under the taxonomy in accordance with section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 at the denominator of the applicable key performance indicator	-	-
7	Value and proportion of other taxonomy-non-eligible economic activities not mentioned in rows 1–6 above at the denominator of the applicable key performance indicator	-	-
8	Total value and proportion of taxonomy-non-eligible economic activities at the denominator of the applicable key performance indicator	-	-

7.2.2 Climate Change

7.2.2.1 Transition Plan for Climate Change Mitigation – E1-1

As a responsible bank, Exim Banca Românească has committed to combating climate change by considering a series of measures to reduce the environmental impact of its portfolio as well as its own operations. Thus, the bank is undergoing a comprehensive evaluation process of its carbon footprint and of the credit portfolio's exposure to climate risks, in accordance with the requirements of ESRS E1-1. Although formal decarbonization plans are currently under development and have not yet been approved by the Board of Directors, the bank acknowledges the strategic importance of this initiative; however, at this time, it does not have a formal transition plan.

Within this process, the following steps have been completed or are currently underway:

- Completion of the inventory of direct and indirect emissions (Scope 1, 2, and partially Scope 3);
- Evaluation of the credit portfolio's exposure to carbon-intensive sectors;
- Establishment of a governance framework for the approval and implementation of the decarbonization plan.

In this context, the bank does not have approved emissions reduction targets aligned with the Paris Agreement that can be reported in accordance with ESRS E1-4. The bank aims to finalize the development and approval of the decarbonization plan during 2025–2026, including intermediate and long-term objectives, as well as specific measures to achieve them. Following the implementation of the decarbonization plan, emissions reduction objectives and targets will be set and specific policies will be developed accordingly.

In the meantime, the bank has set a series of objectives and has already initiated certain operational measures to reduce the carbon footprint of its own operations and has carried out a preliminary evaluation of the portfolio's exposure to climate risks, as detailed in the following sections of this report.

The bank is in the initial phase of developing a decarbonization strategy, justified by multiple considerations of methodological rigor and analytical accuracy, as well as the necessity of prior implementation of carbon footprint calculation methodologies and the actual performance of the calculation as the basis of the decarbonization plan.

The institutional size of the bank and the structural characteristics of the asset portfolio are determining factors in conceiving a viable climate transition trajectory. The diversity of financed economic sectors, the degree of exposure to carbon-intensive industries, and the geographical concentration of lending operations are essential variables that require thorough analysis prior to formulating quantitative objectives.

For the calculation methodology of financed emissions, the bank relied on Standard A – Financed Emissions of the Global GHG Accounting and Reporting Standard for the Financial Industry, issued by the Partnership for Carbon Accounting Financials (PCAF). This inaugural step in calculating the carbon footprint of financing activities represents a fundamental first step in establishing an empirical baseline. However, the absence of a time series of financed emissions data necessitates a prudent approach in defining reduction trajectories.

The bank is aware of the critical importance of grounding decarbonization objectives in robust historical data that allow for the identification of trends and the proper calibration of strategic interventions. Consequently, the premature approval of quantitative targets in the absence of a relevant statistical history would contradict the principles of responsible governance and would generate significant reputational risks.

Exim Banca Românească commits to continuing the consolidation of the GHG emissions database, refining analytical methodologies, and developing, within the next financial year, a comprehensive transition plan, scientifically grounded and aligned with the highest sectoral standards. In parallel, it will continue to implement operational energy efficiency measures and develop internal capacity for climate risk assessment, thereby preparing the organizational infrastructure needed for an effective transition toward a low-carbon economy.

Material impact, risks, and opportunities and their interaction with the strategy and business model – ESRS 2 – SBM 3

The bank has identified, within the double materiality assessment (DMA) process, a series of material aspects related to climate change, including the associated impact, risks, and opportunities. Thus, in the upcoming period, for each significant climate-related risk it has identified, it will evaluate the category under which they may fall, namely whether the risk is a physical climate-related risk or a climate transition risk. Details regarding the material aspects of climate change have been presented in section 7.1.6.

Moreover, the bank is carrying out a consultancy program in collaboration with E&Y, through which it will aim to integrate climate and environmental risks into the internal risk management framework, including within the internal ICAAP and ILAAP processes.

The outcome of this exercise, as well as of the stress tests that will be considered, is estimated to be completed during 2025 and will contribute to the adaptation of the strategy for managing significant risks and, implicitly, the bank's overall strategy and business model.

7.2.2.2 Policies Related to Climate Change Mitigation and Adaptation – E1-2

Climate change and the unsustainable management of the environment are among the most serious current challenges, with their negative impact increasing globally, both in society and the economy. Climate change manifests itself through the increased frequency and severity of extreme weather events and requires a behavioral shift to encourage climate change mitigation and/or adaptation.

Financial institutions will play a key role in financing the transition to a low-carbon, sustainable economy by increasing the share of green financing in their credit portfolios.

The Bank acknowledges that its activity can have a significant effect on each pillar of sustainability, namely the economic, social, and environmental domains. Thus, the Bank's objective is to conduct long-term profitable business, while avoiding, among other things, social and environmental damage, by applying appropriate due diligence practices (see Chapter GOV-4: Statement on due diligence).

Additionally, the Bank is in a continuous process of improving processes regarding environmental protection and social standards, including involvement in sensitive areas of activity.

Through its lending policies, the Bank contributes indirectly to generating an environmental impact and therefore implements proactive measures to mitigate the impact generated.

At the same time, the Bank closely monitors financed emissions so that it can make decisions that contribute to their reduction and support the transition of the Romanian economy toward a sustainable economy by creating the premises for understanding, developing, and accelerating the European "Net Zero" target.

To support its clients in improving their carbon footprint and achieving their sustainable transformation, the Bank will need to evaluate in detail significant-value transactions and projects based on ESG criteria and provide advisory to clients accordingly.

In 2024, the Bank refined its **ESG risk classification framework**, taking into account the new NACE rev. 3 codes as well as the intention to **evaluate in detail ESG risks** and the measures needed to mitigate them (for significant-value transactions and projects).

In 2025, the Bank intends to create a **sustainable lending framework** that establishes uniform definitions for sustainable clients and sustainable transactions. The application of Green Lending principles, ESG risk analysis, and the objectives of the EU taxonomy are foundational elements considered in the development of the sustainable lending framework. The main purpose of Exim Banca Românească's Sustainable Lending Framework for granting green and transition loans is to support the development of projects and activities that contribute to environmental protection and the reduction of climate change impact. By granting green and transition loans, the Bank supports investments in renewable energy sources, energy efficiency, and other green initiatives and supports companies in their gradual transition to a more sustainable business model. Thus, Exim Banca Românească actively contributes to the development of a sustainable economy and the implementation of climate change mitigation strategies. Sustainable credit must provide a clear benefit for the climate and/or the environment, a benefit that is linked to sustainable economic activities, society, and communities.

The lending framework will be a living document and will be expanded to cover an increasing number of sectors and economic activities, in line with business opportunities.

Awareness-raising actions among clients regarding climate and environmental risks, including to support or accelerate transition plans, will be carried out by the Bank throughout the duration of the plan. Including messages on sustainability actions in communication plans represents a constant priority for the Bank.

The digitalization of internal processes is also a strategic component aimed at increasing process efficiency, enhancing customer satisfaction and financial inclusion, and playing an important role in reducing resource usage and greenhouse gas emissions.

The first phase of the digitalization process aims to ensure a level of digital data maturity to allow for innovation and further digital implementations. This phase includes the development of digital products while maintaining alignment with the Bank's strategy and business model, the consolidation of core applications, the development of a new data platform and low-code/no-code solutions, as well as the transition to cloud infrastructure.

In the context above, the development of digital business process and content management solutions (Business Process Management, Enterprise Content Management) represents an important measure for emissions reduction. The implementation of new digital solutions and the improvement of existing ones such as: Internet and Mobile Banking, new functionalities for digital onboarding, Contact Center digital branch, aimed at ensuring a unified omniaccess-type experience, are projects currently under development. Additionally, the development of the area related to payment services and transactions, offering new functionalities to clients through the ATM network and increasing the accessibility of POS payments, represents another measure in support of digitalization.

Energy

Tackling climate change involves coordinated global efforts, requiring improved energy efficiency, transition to renewable energy sources, minimizing greenhouse gas emissions, and adopting sustainable practices across all sectors. In the specific context of the banking industry, our traditional practices involving paper consumption and employee travel, along with energy requirements for maintaining physical spaces and the current digitalization trends needed for IT infrastructure operation, contribute to our ecological footprint.

Moreover, the main component of greenhouse gas emissions specific to the banking industry is represented by financed emissions, which account for over 98% of the Bank's total emissions.

For this reporting exercise, the Bank has carried out an initial calculation of greenhouse gas emissions for Scopes 1, 2, and 3, including category 15 – financed emissions.

The calculation of greenhouse gas emissions across all operations and the value chain of Exim Banca Românească was carried out using the standards set out in the “GHG Protocol: A Corporate Accounting and Reporting Standard,” developed by the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI). In assessing the greenhouse gas emissions inventory, the five principles presented in the GHG Protocol were respected: relevance, completeness, consistency, transparency, and accuracy.

For category 15, financed emissions, PCAF was used – a global standard employed by financial institutions to measure and disclose GHG emissions associated with their lending and investment portfolios. It is fundamental in helping financial institutions understand their carbon footprint, thereby enabling them to develop strategic initiatives to become a low-carbon organization. PCAF has developed different methodologies tailored to measuring emissions for various financial products and investment categories, including, but not limited to, project finance, residential mortgages, commercial real estate, vehicle loans, business loans, and investments. The methodology uses multiple data points, including balance sheet exposure, client-level data, transactional data, and sector-specific data. The granularity of data can significantly impact the accuracy of emissions calculations. The result is usually expressed as absolute emissions or emissions intensity, providing essential insights for strategic decision-making and goal setting toward a climate-resilient economy.

Regarding the consolidated scope, the Bank’s subsidiary, EximAsig, was not included in the financed emissions calculation, considering the insignificant impact of its operations on the total financed emissions recorded at the Bank level.

7.2.2.3 Energy Consumption and Energy Mix – E1-5

The Bank has collected a series of data necessary for calculating greenhouse gas (GHG) emissions, with the data captured in databases and their granularity requiring, in certain cases, the use of proxies for emissions determination. In this context, and considering the level of detail required for the information, the Bank is not reasonably able to provide the necessary data regarding energy consumption and energy mix in order to offer an understanding of the Bank’s total energy consumption in absolute terms, energy efficiency improvement, exposure to coal-, oil- and gas-related activities, as well as the share of energy from renewable sources in its overall energy mix.

7.2.2.4 Gross GHG Emissions for Scopes 1, 2, and 3 and Total GHG Emissions – E1-6

The Bank carried out a calculation of greenhouse gas emissions considering primarily:

- Gross GHG emissions for Scope 1, in order to provide an understanding of the direct impact on climate change;
- Gross GHG emissions for Scope 2, in order to provide an understanding of the indirect impact on climate change caused by the energy consumed, whether purchased or externally sourced;
- Gross GHG emissions for Scope 3, in order to provide an understanding of GHG emissions that occur across the value chain, both upstream and downstream, aside from the Bank’s Scope 1 and 2 GHG emissions. These represent the main component of emissions and are an important factor in transition risks;
- Total GHG emissions, in order to provide a general understanding of GHG emissions and whether they originate from own operations or from the upstream and downstream value chain. This disclosure is a prerequisite for measuring progress toward reducing GHG emissions in line with the Bank’s climate targets.

For a financial institution, the largest source of GHG emissions originates from financed emissions, which are generated as a result of the financial services provided. These emissions are disclosed under Category 15 Investments in the GHG Protocol. The methodology for calculating financed emissions involved identifying and allocating exposures to one of the asset classes in the GHG Protocol.

For the year 2024, the Bank identified exposures in the following asset classes according to the PCAF methodology: Corporate loans, Corporate bonds, Sovereign bonds, Mortgages, and Equity. The Bank did not classify exposures under Project finance, Commercial real estate loans, or Auto loans.

The general formula used for calculating financed emissions was:

Financed emissions = Emissions × attribution factor

where:

- **Emissions:** Actual GHG emissions of the counterparties, which may be:
 - o Emissions directly reported by the counterparty;
 - o Activity-based emissions (e.g., gas consumed, tonnes of steel produced, etc.); or
 - o Economic activity-based emissions (tCO₂/million revenue).
- **Attribution factor:**
 - o This factor determines the share of emissions attributed to the Bank based on its financing. Consequently, it is always limited to 1.
 - o It is calculated by taking the balance of a loan or investment and dividing it by a certain measure of total value (such as the origination value for real estate or enterprise value for corporate loans).

For the Mortgages category, the following input data and assumptions were used:

- **Emissions:** were calculated by multiplying the usable area (in m²) of the property by the emission factor (tCO₂e/m²) retrieved from the European emission factor database for buildings – PCAF (<https://building-db.carbonaccountingfinancials.com/>), based on country, property type, and Energy Performance Certificate (EPC) class.
- **Attribution factor:** was calculated as the share of the loan balance relative to the property's origination value.

For the Corporate loans, Corporate bonds, and Equity categories, the following input data and assumptions were used:

- **Emissions:** were primarily calculated by multiplying the total revenue of the counterparty by the average emissions of the industry in which the counterparty operates (tCO₂e/million lei revenue), using data published by the National Institute of Statistics (INS). In limited cases, emissions were directly reported by counterparties in their sustainability reports.
- **Attribution factor:**
 - o It was calculated as the share of the balance sheet exposure relative to:
 - **EVIC (Enterprise Value Including Cash)** for listed companies;
 - **Equity + Total Liabilities** for unlisted companies or listed companies for which EVIC is not available in the database.
 - o For corporate loans and corporate bonds, this factor is always capped at 1 at client level.
 - o The alternative option used when sufficient financial data is not available is based on the **average intensity** (calculated as financed emissions / balance sheet exposure) of similar exposures (grouped by asset class and industry or by asset class, depending on data availability).

For exposures outside Romania, collecting country-specific emission factors would require a disproportionate level of effort and resources compared to the benefit obtained; therefore, a proxy based on emission data from Romania, sourced from the National Institute of Statistics (INS), was used.

As of 31.12.2024, the above proxy approach was applied only to the **Equity** asset class, representing **0.006%** of the total balance (in RON) of assets included in the scope of the GHG emissions calculation.

Consequently, applying Romanian emission factors for such a small share of exposure represents a pragmatic, efficient approach that maintains reasonable accuracy without incurring excessive efforts.

For the Sovereign bonds category, the following input data and assumptions were used:

- **Emissions:** country-level emissions retrieved from **EDGAR – Emissions Database for Global Atmospheric Research** (<https://edgar.jrc.ec.europa.eu/>).
- **Attribution factor:** calculated based on the share of exposure in the total GDP of the country (PPP USD, expressed in RON equivalent), using data published by the **World Bank**.

Limitations

a. Mortgage Loans

For mortgage loans where an EPC (Energy Performance Certificate) rating was not available, two options were considered:

- The use of the “n/a” emission factor from the PCAF database; or
- The use of an average EPC rating calculated based on the bank’s existing data (available for 2% of mortgage loan contracts).

Using the first option would result in an emission factor of 0.0222 for a single-family house and 0.022 for a multi-family house.

Using the second option, the resulting average EPC rating leads to the use of an EPC rating of B. According to the PCAF database, for class B, the emission factor is 0.0237 for a single-family house and 0.0239 for a multi-family house—both emission factors being higher than those in the first option.

In conclusion, the second option was considered by the bank, as it is supported by real data on energy performance at loan origination and leads to a slightly more conservative result.

b. Corporate Loans, Corporate Bonds, Equity.

The bank has adopted a deviation from the standard PCAF methodology in calculating financed emissions. Specifically, the bank is currently limited to calculating only **Scope 1 emissions** for its counterparties, using industry emissions data from the **National Institute of Statistics (INS)**. Consequently, Scope 2 and Scope 3 emissions are not included in the financed emissions calculation. This approach is justified by the following considerations:

1. Limited data availability:

Detailed and reliable data for Scope 2 and 3 emissions is often not consistently available for all counterparties, hindering the ability to generate accurate assessments.

2. Issues related to data quality and comparability:

Various reporting practices and differing data quality for Scope 2 and 3 emissions introduce significant challenges in ensuring comparability and consistency across different sectors.

3. Methodological complexity:

Calculating Scope 2 and 3 emissions involves complex, often customized methodologies that require extensive data and assumptions, complicating the standardization process.

4. Resource constraints:

The additional resources required to collect, verify, and analyze comprehensive Scope 2 and 3 data are currently disproportionate to the incremental benefit in accuracy, especially considering existing data gaps.

5. Alignment with national practices:

Our current approach aligns with national reporting practices, as the **National Institute of Statistics** mainly publishes industry average figures for Scope 1 emissions, ensuring consistency with national benchmarks.

With regard to data quality scores (DQS), the bank applied the following:

- Score 2 for:
 - Unaudited emissions reported directly by counterparties – limited cases identified for corporate loans;
 - Emissions reported by countries not audited according to EDGAR for sovereign exposures;
- Score 3 for:
 - Mortgage loans where average emission factors per actual surface area, EPC rating, and type of collateral were used (i.e., data available in the bank's systems/databases);
- Score 4 for:
 - National proxies (data provided by the National Institute of Statistics – INS) for commercial loans, corporate bonds, and equities;
- Score 5 for:
 - Estimated emissions (i.e., emissions calculated due to the limitations previously described) for corporate loans and equities, resulting from missing or incomplete financial data of the counterparties;
 - Mortgage loans where an estimate of the EPC rating and the useful surface area of the properties was made due to incomplete data regarding the respective collaterals;

Below is an analysis of the financed emissions (Scope 3) associated with the bank's lending and investment activities, calculated using the PCAF methodology (Standard A: Financed Emissions).

Total financed emissions (tCO₂) and average emissions intensity (tCO₂/MRON financed) broken down by asset classes

Asset Class	Exposure Balance (RON)	Of which direct/reported emissions were collected	Emissions_tCO ₂	Of which reported/collected directly	Financed Emissions_tCO ₂	Intensity_tCO ₂ /mil. RON	Avg Weight DQS
Corporate loans	8,834,345,188	78,403,194	20,355,142	2,832,922	452,408	51.21	4.00
Corporate bonds	54,357,447	-	31,788	-	21	0.38	4.00
Equities	5,836,272	575,924	701,465	614,589	110	18.93	4.11
Mortgage loans	1,970,510,755	-	17,191	-	10,391	5.27	5.12
Government securities	4,197,528,352	-	3,598,981,620	-	106,887	25.46	2.00
TOTAL	15,062,578,014	78,979,119	3,620,087,205	3,447,511	569,817	37.83	3.59

The highest emission intensity per 1 million RON (51.21) and the largest contribution to the Bank's average (79.39%) is observed for corporate loans. The average data quality score for this category is relatively high (4). The second largest contribution to the Bank's average (18.75%) comes from the sovereign asset class; however, the emission intensity (25.46) is below the average (37.83). The third contribution to the Bank's average (1.82%) comes from mortgage loans, but the emission intensity (5.27) is significantly below the average (37.83).

The result of the GHG emissions calculation across all categories is presented in the table below, with the information clearly showing the consolidation scope by each component.

Scope	Type of Activity	Reference Year 2023	Reference Year 2024	Unit of Measure
Scope 1	Stationary combustion - Exim Banca Românească	632.90	731.21	tons CO ₂ e
Scope 1	Mobile combustion - Exim Banca Românească	275.54	322.66	tons CO ₂ e
Scope 1	Stationary combustion - EximAsig	11.29	7.69	tons CO ₂ e
Scope 1	Mobile combustion - EximAsig	32.66	32.66	tons CO ₂ e
Scope 1	Total Scope 1 emissions GHG	952.38	1,094.21	tons CO₂e
Scope 1	Percentage of GHG emissions from regulated emissions trading schemes (%)	0	0	-

Scope 2	Purchased electricity (Location Based) – Exim Banca Românească	872.88	788.17	tons CO ₂ e
Scope 2	Purchased electricity (Market Based) – Exim Banca Românească	868.80	790.02	tons CO ₂ e
Scope 2	Purchased electricity (Location-Based) – EximAsig	10.29	8.88	tons CO ₂ e
Scope 2	Purchased electricity (Market-Based) – EximAsig	10.03	8.65	tons CO ₂ e
Scope 2	Purchased thermal energy – Exim Banca Românească	122.58	136.96	tons CO ₂ e
Scope 2	Purchased thermal energy – EximAsig	0.00	0.00	tons CO ₂ e
Scope 2	Total Scope 2 GHG emissions (Location-Based)	1,005.74	934.01	tons CO₂e
Scope 2	Total Scope 2 GHG emissions (Market-Based)	1,001.40	935.64	tons CO₂e
Scope 3.1	Purchased goods and services	3,708.89	4,726.65	tons CO ₂ e
Scope 3.2	Capital goods	-	-	tons CO ₂ e
Scope 3.3	Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	277.55	291.05	tons CO ₂ e
Scope 3.4	Upstream transportation and distribution	-	-	tons CO ₂ e
Scope 3.5	Waste generated in operations	2.92	2.77	tons CO ₂ e
Scope 3.6	Business travel	113.76	71.41	tons CO ₂ e
Scope 3.7	Employee commuting (total estimated)	497.88	557.85	tons CO ₂ e
Scope 3.8	Upstream leased assets	-	-	tons CO ₂ e
Scope 3.9	Downstream transportation	-	-	tons CO ₂ e
Scope 3.10	Processing of sold products	-	-	tons CO ₂ e
Scope 3.11	Use of sold products	-	-	tons CO ₂ e
Scope 3.12	End-of-life treatment of sold products	-	-	tons CO ₂ e
Scope 3.13	Downstream leased assets	-	-	tons CO ₂ e
Scope 3.14	Franchises	-	-	tons CO ₂ e
Scope 3.15	Investments	807.358	569.817	tons CO ₂ e
Scope 3	Total indirect GHG emissions Scope 3 – Exim Banca Românească, EximAsig	811,958.99	575,466.73	tons CO₂e
	Total GHG emissions (Location-Based)	813,917.12	577,494.95	tons CO₂e
	Total GHG emissions (Market-Based)	813,912.78	577,496.58	tons CO₂e

GHG Intensity based on net income

GHG intensity was determined in accordance with the ESRS provisions, by relating the total GHG emissions in metric tons of CO₂ equivalent to the bank's net income.

Thus, the GHG intensity based on the two calculation methods is presented below:

Location-based:

- Total GHG emissions: 577,494.95 tons CO₂e
- Net income (operational, group level): 756,961,000
- GHG intensity: 0.00076291

Market-based:

- Total GHG emissions: 577,496.58 tons CO₂e
- Net income (operational, group level): 756,961,000
- GHG intensity: 0.00076291

Waste management

The bank's line of business involves low resource consumption at the level of direct operations, with commonly used materials being paper, printer cartridges, IT equipment, non-IT equipment, and lighting devices. All resulting waste is disposed of/recovered in accordance with Law 426/2001, and their records are kept in line with the national Waste List established by Government Decision no. 856/16.08.2002, as subsequently amended.

7.3 Social Information

The policies, procedures, and practices in the field of human resources are constantly aligned with the practices developed within the banking market and aim to establish the minimum guaranteed rights for all employees, promote fair labor relations to ensure social protection for employees, foster mutual cooperation in the field of labor relations, and promote social partnerships. These also take into account collective bargaining, namely the negotiation of the Collective Labor Agreement at the bank level, which ensures freedom of expression, equal opportunities in exercising the profession and conducting work activities, employee rights and obligations, and the prohibition of any form of discrimination.

7.3.1 Own workforce S1-6; SBM-3

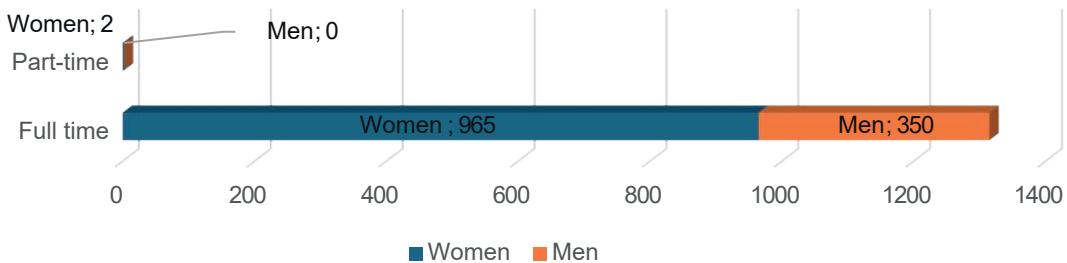
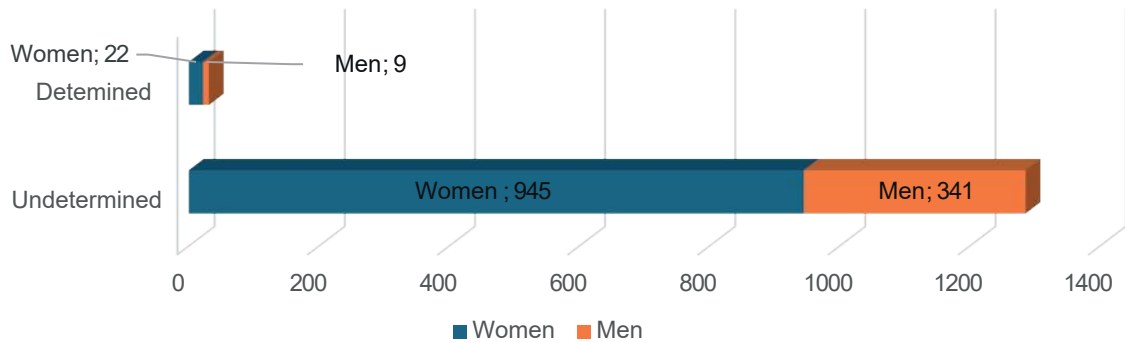
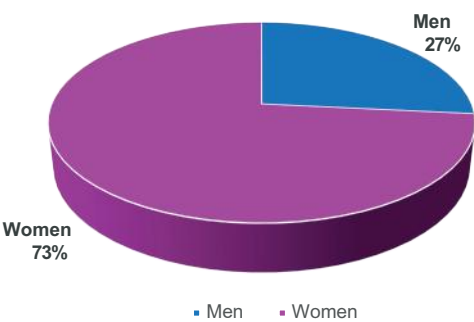
The management practices developed within the bank have been based on the constant awareness of the importance of the human factor in proactively and professionally developing and motivating employees, as well as on the continuous development of practices for adapting and integrating into an attractive, inclusive, and collaborative work environment, so that each employee has the opportunity to develop the necessary skills and abilities.

The recruitment and selection policy of Exim Banca Românească is based on identifying and attracting personnel with a high level of expertise and professional reputation, who can bring added value to the position they occupy within the bank, as well as on the development and promotion of ethical values and professional conduct standards, in order to ensure a high-performing and safe work environment.

Thus, the bank has a team of professionals dedicated to providing high-quality financial products and services to its clients.

The structure of the staff at the end of 2024 at Exim Banca Românească is as follows:

	Women	Men	Total
Number of employees	967	350	1317
Permanent contracts	945	341	1286
Fixed-term contracts	22	9	31
Full-time	965	350	1315
Part-time	2	0	2



7.3.1.1 Working Conditions – S1-3

The bank is constantly concerned with ensuring working conditions that comply with occupational health and safety standards and regulations.

Through the institution of employee representation at the bank level, within the partnership especially developed through the negotiation of the Collective Labor Agreement, the bank ensures an ongoing open dialogue in which employees are encouraged to express their concerns and needs.

The bank's development strategy, which defines medium- and long-term objectives, involves strengthening and increasing trust in the employee–employer and employee–client relationships (both existing and potential), contributing to the development of sustainable partnerships through the delivery of added value and the enhancement of employees' professional expertise—elements that foster active employee engagement within the bank in a competitive labor market.

Exim Banca Românească has a policy based on collaboration, trust, and mutual respect in the work process, which has led to the avoidance of situations involving internal regulation violations or abuse. Each manager's role is to continuously provide support and encourage employees to report non-compliant situations, in accordance with the provisions of the Procedure regarding the internal/external whistleblowing channel – “Whistleblowing”.

7.3.1.1.1 Safe Workplaces – S1-6

The bank consistently ensures a working environment based on stability, optimal working conditions, and social security. This is reflected in the fact that, in 2024, the bank recorded a staff turnover rate in line with the average of the banking system, as follows:

	Hires	%	Departures	%
<i>Gender</i>				
Women	139	10.55%	142	10.78%
Men	36	2.73%	43	3.26%
Total	175	13.29%	185	14.05%
<i>Location</i>				
Head Office	98	7.44%	85	6.45%
Branches	77	5.85%	100	7.59%
Total	175	13.29%	185	14.05%
<i>Age</i>				
< 30 years	37	2.81%	32	2.43%
30 - 50 years	108	8.20%	126	9.57%
> 50 years	30	2.28%	27	2.05%
Total	175	13.29%	185	14.05%

7.3.1.1.2 Working Time

Employment relationships with staff are governed by labor legislation, and working time is defined both in the Collective Labor Agreement and in Individual Employment Contracts.

To foster a balance between employees' personal and professional lives, the bank has provisions for individualized work schedules, either at the employee's request or with their consent, in compliance with the applicable Internal Regulations at the bank level, the Collective Labor Agreement, and the Labor Code. Individualized work schedules allow for flexible organization of working time.

The bank does not encourage overtime work, ensuring a balance between personal and professional life.

7.3.1.1.3 Adequate Wages – S1-10; S1-16

The bank's remuneration system is based on alignment with the Romanian banking system by granting competitive salaries in line with the banking market, in order to ensure well-trained employees with experience and professional reputation. To achieve this goal, the bank participates in salary surveys or purchases salary studies.

Exim Banca Românească respects the principle of equity, taking into account the business strategy, organizational culture and values of the bank, long-term interests, and business performance, and incorporates measures to avoid conflicts of interest.

Within the bank, employee remuneration is provided without discrimination based on gender. Salary levels are calculated by analyzing each employee category (B-1, B-2, other management or specialist positions) correlated with the job grade, which reflects the position's impact within the bank hierarchy.

Employee category	Base salary ratio between women and men
B-1	18%
B-2	9%
Management	23%
Specialists	23%

The ratio between the total annual remuneration of the individual with the highest remuneration in the organization and the total annual median remuneration of all employees (excluding the individual with the highest remuneration) – 7.72.

7.3.1.1.4 Social Dialog – S1-2

At the bank level, the institution of employee representation is recognized and operates in accordance with the Social Dialogue Law.

Social dialogue is based on transparent and continuous communication with **all employees (100%)** and is a standard practice within Exim Banca Românească, ensuring that all issues important to employees are addressed in an inclusive and collaborative manner.

The bank and the elected representatives of the employees ensure constructive dialogue in order to inform all employees about the provisions of the Collective Labor Agreement (CLA), and the interpretation of clauses is carried out by consensus.

At the bank level, the CLA is negotiated once every two years with the elected representatives of the employees, based on the mandate given by the employees regarding their rights.

Communication with employees takes place through multiple channels, both online (email, instant messages, the bank's internal portal, the online learning platform, etc.) and through structured direct communication (meetings, one-on-one discussions) at any hierarchical level.

7.3.1.1.5 Freedom of Association, Existence of Works Councils, and Workers' Rights to Information, Consultation, and Participation

Employee representatives are responsible for handling the negotiations regarding the Collective Labor Agreement, ensuring the observance of employees' rights, and defending their interests with respect to salaries, working conditions, working hours, workplace safety, and other professional, economic, and social matters related to labor relations. In addition, they play a crucial role in consolidating colleagues' proposals and engaging in negotiations with management representatives.

7.3.1.1.6 Collective Bargaining, Including the Proportion of Workers Covered by Collective Bargaining Agreements – S1-8

Collective bargaining is ensured in compliance with Law no. 367/2022 – the Law on Social Dialogue.

The provisions of the Collective Labor Agreement apply to **all employees (100%)** within the internal structures/territorial units of the bank, regardless of their position or hiring date.

7.3.1.1.7 Work-life Balance S1-15

At the bank level, in accordance with internal procedures, there is no differentiation between the benefits granted to full-time and part-time employees. Benefits are granted to all categories of employees without discrimination based on citizenship, race, gender, color, language, social origin, genetic traits, sexual orientation, age, disabilities, or other aspects.

The bank's strategy is comprehensive and designed to provide employees and their families with the tools they need to adopt a healthy lifestyle.

In accordance with internal regulations, the bank offers employees additional days off beyond those stipulated by law, for participation in various family events.

	Women		Men		Total	
	no.	%	no.	%	no.	%
Employees who took leave for family-related reasons	154	12%	56	4%	210	16%

In addition, the bank addresses employees' needs by providing social assistance through the Social Committee in special situations affecting them or their family members.

The Social Committee analyzes and evaluates employees' requests and the supporting documents they submit, in order to determine the amount of social aid that Exim Banca Românească can grant to its employees and their first-degree family members and spouses.

7.3.1.1.8 Health and Safety – S1-1; S1-14

The well-being of employees is a crucial element for Exim Banca Românească, supported by individual responsibility and reinforced by the bank's role as a responsible employer.

At the bank level, in accordance with the applicable legal requirements and the strategy on social and welfare objectives, the General Procedure for Ensuring Occupational Health and Safety of the Bank's Employees was developed.

To monitor occupational health, the bank has established the Occupational Health and Safety Committee (C.S.S.M.), whose role is to organize and oversee the prevention and protection activities within the bank.

As a result, health programs and services are structured to improve and maintain the physical and mental health of employees through regular medical check-ups, given their role and importance.

Thus, the Human Resources Department, based on the legal framework, has ensured the organization and operation of a Health and Safety Department, which is responsible for developing and implementing the Health Strategy and integrating health services and programs at bank level, as well as ensuring the implementation of a package of medical services and benefits provided to employees by specialized clinics.

A constant concern is to manage and mitigate workplace risks and potential incidents. Risks arising from employees’ work activities are assessed and identified, along with measures that can reduce them. Additionally, continuous evaluation through inspections ensures that health and safety standards are upheld.

The bank applies the same safety standards to contractors who provide various services within the bank throughout the duration of their collaboration. Thus, the bank expects contractors to adhere to its standards and monitors compliance throughout the collaboration period.

Exim Banca Românească fulfills its obligation to ensure the health and safety of all employees in all work-related matters, and develops internal rules for occupational health and safety, as well as for emergency situations and fire protection, ensuring the necessary conditions for their observance.

The bank ensures that each employee receives adequate and appropriate training in occupational health and safety, especially in the form of information and instructions tailored to their workplace and specific role.

In 2024, no work-related accidents or fatalities were reported.

Employees covered by the health management system				
No.	%	Number of deaths	Number of work-related injuries	Work-related illnesses
1.317	100%	0	0	0

7.3.1.2 Equal Treatment and Opportunities for All – S1-1

At the bank level, responsibilities and duties regarding workplace diversity, equal opportunities, and non-discrimination were developed in accordance with the applicable legal provisions, as described in the Collective Labour Agreement, the Internal Regulations, and the Code of Ethics, aligned with the provisions of the Universal Declaration of Human Rights, the UN Global Compact Principles, and the guidelines of the International Labour Organization.

7.3.1.2.1 Gender Equality and Equal Pay for Work of Equal Value – S1-16

Within the bank, there are provisions and responsibilities related to diversity, equal opportunities, and non-discrimination in both the Collective Labour Agreement and the Internal Regulations and Code of Ethics.

Personnel decisions regarding job appointments, promotions, remuneration, and employee evaluations are based solely on the skills, performance, and potential of employees, with no reference to gender. These decisions are based on the role to be filled and not on gender criteria.

7.3.1.2.2 Training and Skills Development – S1-13

The bank’s employee training and professional development activities provide a framework for creating continuous training/development opportunities for employees, aimed at developing the skills and competencies needed to foster a culture of high performance that leads to achieving the bank’s strategic objectives.

Ongoing skills updates using modern learning methods and the integration of technology in knowledge transfer and consolidation have been implemented through in-house or open programs focused on developing employees’ technical and soft skills, as well as through the use of the e-learning platform.

As part of the 2024 Annual Training Plan, *training programs were implemented to continuously develop the managers of internal structures and territorial units*, for both corporate and retail activities, with the goal of improving managerial and leadership skills and team cohesion, *as well as programs designed to strengthen knowledge and develop the technical and soft skills of the bank’s employees. In addition, mandatory programs required by legal regulations were organized in the areas of AML/KYC/CFT, Compliance, MIFID II, GDPR, ESG, and Anti-Fraud.*

Throughout 2024, over 30 training programs were conducted via the e-learning platform, including 10 mandatory programs in line with current regulations, as well as programs organized internally or with external training providers, with concrete objectives aimed at improving professional skills.

Technical-themed programs were completed on the e-learning platform, totaling over 7.000 course modules, based on training and development proposals identified at the level of internal structures and territorial units.

Internally developed programs were also implemented by experts working within the bank, to facilitate knowledge sharing and promote best practices within Exim Banca Românească, by disseminating updated information about products and work processes relevant to internal structures and territorial units.

Additionally, specialized internal programs were provided via the e-learning platform (credit administration, cards, POS, account openings, cashier operations, etc.), completed by over 400 employees.

Training and internal communication on ESG

A program on Sustainability in Lending Activities, including relevant themes and objectives, was available on the e-learning platform and completed by employees in the corporate functional line and risk division. This program was organized in accordance with the bank’s approved Sustainability Strategy. Also, certain specialists obtained ESG-related qualifications through participation in programs offered by professional training providers.

During 2024, **1.250** employees participated in training programs in accordance with the approved **professional training plan**, representing approximately **95% of the bank’s total employees**, with the total number of participations in training modules **exceeding 14.000**, which corresponds to an average of **11 training sessions per employee**.

Approximately 73% of the employees participating in training and professional development programs were women, and 27% were men.

The average number of training hours is approximately 40 hours/year/employee, regardless of gender, and includes all types of professional training programs.

7.3.1.2.3 Employment and Inclusion of Persons with Disabilities – S1-12

The bank carries out its activity in accordance with fundamental responsibilities regarding the respect for human rights and labour rights.

At the bank level, the provisions of Law no. 448/2006 have been observed, and the provisions of Emergency Ordinance no. 127/2024 on certain social measures have also been taken into account. Currently, the bank employs 11 staff members with disability certificates, and for the difference required by law up to the 4% employment threshold of the total number of employees, the bank pays the related contributions in accordance with legal requirements:

	Women	Men	Total
Number of persons with disabilities	7	4	11

7.3.1.2.4 Measures Against Violence and Harassment in the Workplace – S1-2, S1-10, S1-11, S1-12, S1-13

The bank supports an inclusive environment for all employees, and any form of discrimination is prohibited, whether based on race, nationality, ethnicity, language, religion, social category, beliefs, sex, sexual orientation, age, disability, non-contagious chronic illness, HIV infection, belonging to a disadvantaged group, or any other criterion.

According to the Procedure for preventing and combating harassment based on sex, as well as moral harassment at the workplace, which is applicable at the bank level, all employees have the right and are encouraged to report any case they consider to be harassment or discrimination.

Through specific internal procedures and in compliance with applicable legislation, the bank implements appropriate measures to combat any form of retaliation against individuals who report violations of the law or who assist in investigating cases of discrimination or any kind of harassment, in the sense that all such retaliatory actions are prohibited and are thoroughly investigated.

In 2024, no reports of harassment incidents were recorded.

7.3.1.2.5 Diversity – S1-9

Exim Banca Românească constantly develops principles regarding the inclusion of diversity within the organizational culture by promoting cohesion between employees and management and a healthy working environment.

Through the implementation of the policy on promoting diversity management, the bank leverages talent and promotes workforce diversity, while also seeking appropriate ways to develop an inclusive, innovative, and high-performing organization.

Staff structure by age:

	<30 years	30-50 years	>50 years	Total
Total staff	107	818	392	1317

Exim Banca Românească maintains a culture of communication based on respect and appreciation, and the objective of the Human Resources Division is to maximize team diversity and to ensure diversity at the highest management levels.

Staff structure by gender at bank management level at the end of 2024:

	Women	Men	%W	%M	Total
B-1	11	14	44%	56%	25
B-2	31	38	45%	55%	69
Total management	42	52	45%	55%	94

7.3.1.3 Other Labour-Related Rights

7.3.1.3.1 Forced Labour and Child Labour

Within the bank, respect for human rights and labour legislation represents fundamental principles of activity. The bank is firmly committed to complying with all legal and regulatory requirements regarding the prohibition of forced labour and child labour, ensuring an ethical, safe, and fair working environment for all employees.

7.3.1.3.2 Confidentiality

At Exim Banca Românească, mutual commitment is important to ensure transparency, effective communication, understanding, and contributes to building a long-term relationship of trust and cooperation, bringing mutual benefits and supporting common objectives. This contribution enables the bank to identify and manage risks or issues and to capitalize on opportunities for innovation and continuous improvement.

Through specific internal regulations, employees are required to maintain the confidentiality of information and documents they become aware of directly or incidentally (including via electronic mail) in the performance of their duties and responsibilities, and to ensure that such information is stored under appropriate physical and informational security conditions.

Additionally, employees are required to comply with legal provisions on data protection and to ensure the confidentiality and integrity of personal data, as well as the adequate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

7.3.2 Consumers and end Users

7.3.2.1 Policies Regarding Consumers and End Users – S4-1

The Bank's main concern is to respect and protect its relationship with its customers, to provide the highest quality services, and to meet their needs. The Bank's business practices are governed by high ethical and professional standards and focus on the fundamental importance of respect, sincerity, honesty, and consistency in the conduct of its activities. Thus, the basic principle of the *Policy on Customer Complaint/Request Management* is that any activity should be customer-oriented.

The purpose of the policy is to ensure an appropriate framework for conducting the complaint management process within the bank. Through this regulation, the bank aims to:

- update and modernize the handling of complaints/requests to respond to legislative, regulatory developments and supervisory requirements,
- provide clear and up-to-date guidance on the effective complaint/request handling procedure,
- raise staff awareness and provide guidance to avoid actions that may lead to fines or damage the bank's reputation,
- ensure trust and transparency in the bank's relationship with its clients,
- generally improve the level of services provided by systematically analyzing and capitalizing on the information resulting from handling complaints/requests,
- improve the quality of customer relations by strengthening a culture of regulatory compliance among the bank's staff,
- effectively monitor complaint/request management in order to identify, assess, manage and reduce risks associated with or resulting from their handling,
- strengthen the framework of moral and ethical conduct principles for the bank's employees, as provided for in the *Exim Banca Românească Code of Ethics*.

The Bank monitors and analyzes the causes of individual complaints to identify root causes common to various types of complaints. Based on the observed case patterns and ongoing analysis of complaints, it identifies recurring or systemic issues and brings them to the attention of the internal structure responsible for assessing any legal and operational risks or the way in which other processes or products may be affected, including those not directly subject to the complaint. The responsible structure takes the measures it deems necessary to correct such root causes, when reasonably possible. The Bank's management is periodically informed about the complaints submitted by the Bank's clients.

In conclusion, efficient complaint management, combined with continuous improvement measures, helps increase customer satisfaction and strengthen long-term relationships. By understanding the needs and concerns of its clients, the Bank can build a complaint management process that not only resolves issues but also prevents their occurrence in the future.

During 2024, 52 justified complaints were recorded, representing less than 1% of the customer database; during the same period, the National Authority for Consumer Protection (ANPC) issued 3 fines to the Bank (RON 10.000, RON 1.000, and RON 25.000 – the latter being contested by the Bank), as well as a warning.

7.3.2.2 Collaboration Processes with Consumers and End Users Regarding Impacts – S4-2

Collaboration processes with consumers and end users are essential for understanding the impacts of Exim Banca Românească's products or services on them. These processes help the bank gather customer feedback, identify needs, and improve the user experience, consequently enabling rapid adjustment of products and services to minimize negative impacts and maximize benefits.

Exim Banca Românească uses continuous and transparent communication in its relationship with consumers and end users, providing them with dedicated communication channels such as the customer support service (Call Center), which helps maintain an ongoing dialogue with users. This way, they can report any negative or positive impact related to a product, and the bank can respond promptly.

Additionally, Exim Banca Românească uses social media posts to inform consumers about potential impacts, such as product updates or significant changes in the product and service offering.

7.3.2.3 Remediation Processes for Negative Impacts and Channels Through Which Consumers and End Users Can Raise Concerns – S4-3

Among the methods and measures adopted to efficiently manage complaints and improve the information process are:

1. Implementation of an easily accessible complaints system:

- Customers have several simple methods available to submit complaints:
 1. Via a form available on the bank's website,
 2. By electronic correspondence at the dedicated email address: reclamatii@eximbank.ro,
 3. In written form, by submitting to the bank's branches or via postal mail.
- The contact information for complaints is visible on the bank's website, posted in branches, and included in contractual documents such as the General Business Conditions for Individuals.

2. Clear and well-defined process:

- The Bank follows a standardized process for complaint handling, which includes clear steps for collecting information, assessing the complaint, and resolving it.
- The Bank records complaints in a database in order to track their history and prevent recurrence of similar issues.
- The database is also used to monitor response time. The Bank will draft response letters in accordance with applicable legislation as follows: the response deadline for complaints received from customers is 30 calendar days from the registration date in the bank, except for other deadline imposed by specific legislation in force or by authorities (e.g., the National Authority for Consumer Protection, the National Bank of Romania) in the case of complaints received through them.

3. Prompt and empathetic response:

- Customers receive a prompt and personalized response, showing that their concerns are treated with urgency.
- Using an empathetic and respectful tone in communication with the customer, even in difficult situations, is essential for maintaining a good relationship.

4. Detailed investigation of the issue and provision of solutions:

- The department responsible for the complaints management process/flow in retail is the Complaints Management Department.
- Identification and involvement of the responsible entity, i.e., the internal structure responsible for remedying the root cause and drafting/completing/modifying the proposed response. Responsible entities may include (but are not limited to): Retail and SME Product Development Directorate, Corporate Network Division, Operations Directorate, Debt Remediation and Recovery Directorate, Retail Credit Risk Directorate, Credit Administration Directorate, Retail Network and Sales Directorate, Treasury and Financial Markets Division, etc. The responsible entity may involve support entities in resolving complaints when deemed necessary. A support entity is the division/directorate/department/service that provides the necessary support/specialized consultancy, as applicable, and may include (but is not limited to): Legal Directorate, Compliance Directorate, Business Process Directorate, Retail Credit Risk Directorate (Retail Credit Center Department, etc.), Credit Administration Directorate – SBB and Retail Credit Administration and Monitoring Department, Cards Directorate, IT Division – IT Operations Directorate (Internal HelpDesk Department), Finance-Accounting Division, Marketing and Corporate Image Department, Data Protection Officer (DPO), retail territorial units, etc.
- Each complaint is thoroughly investigated to understand the root cause of dissatisfaction and to avoid temporary solutions.

Process improvement measures:

1. Complaint frequency analysis:

- The bank monitors and analyses complaint patterns to identify areas where there are recurring deficiencies (e.g., non-compliant banking products, cumbersome workflows).
- Additionally, the bank implements preventive measures to reduce the number of complaints, such as improving staff training processes.

2. Ongoing staff training:

- Regular training for employees on efficient complaint handling, communication skills, and conflict resolution techniques.
- Creating an organizational culture where employees are encouraged to take initiative and address complaints in a professional and efficient manner.

Evaluating the effectiveness of consumer interactions

1. Response and resolution time for complaints:

- The bank considers measuring the average response and resolution time for complaints in order to understand the efficiency of the process. A shorter response time indicated quicker and more effective complaint management.

2. Long-term trend analysis:

- The bank reports complaint management trends to leadership teams for strategy adjustment.

Essentially, impacts related to consumer and end-user information are extremely important, given that accurate and transparent information can directly influence purchasing behavior and contribute to more responsible consumption.

The bank adopts the following measures related to consumer information:

- Provides clear and detailed information about products and services that enable clients to make more informed and responsible decisions. For example, clients who are informed about the ecological impact of products may choose more sustainable products that meet high standards of social and environmental responsibility.
- Provides clear information about consumer rights (e.g., the right to withdraw from a credit product), contributing to increased market trust and protecting clients from abusive commercial practices. This can reduce conflicts between consumers and the bank (e.g., potential complaints) and lead to more responsible behavior from consumers.

- Is committed to innovation and product improvement, adapting its products and services to better meet market demands. In this way, the bank aims to enhance customer experience and increase its competitiveness.
- Contractual documentation is drafted in the spirit of clear, accurate, and complete information, containing accessible content that ensures the protection of consumer rights, avoids discrimination, and contributes to the development of a sustainable economic environment.

Conclusion

The impacts related to correct and complete consumer information are significant and directly influence consumer behavior, public health, the environment, and the global economy. Transparent information not only protects consumers but also supports the sustainable and responsible development of the bank. By emphasizing the education and information of its clients, the bank can build stronger and longer-lasting relationships, which, in the long term, can bring significant benefits to both parties.

Exim Banca Românească has a marketing approach that includes ethical, sustainable, and socially responsible practices while keeping the customer's interests at the center. In this context, marketing activities focus on delivering creative campaigns that promote transparency and social responsibility.

The principles underpinning the bank's marketing actions are:

- communication based on fairness, respect, mutual trust, transparency, and responsibility;
- continuous, consistent communication oriented toward achieving both the bank's objectives and those of the other involved parties;
- providing complete, accurate, objective, and clear information that reflects a true image of the bank's products and activities.

Through its responsible marketing actions, the bank acts to:

- Increase consumer trust through transparency regarding data collection, usage, and security measures for protecting client data;
- Client-centricity by prioritizing customer needs, preferences, and well-being through soliciting and obtaining feedback;
- Reputation enhancement by positioning itself as an organization that values integrity and social responsibility;
- Increase customer loyalty by generating more personalized and meaningful engagement with the target audience;
- Social responsibility through actions that support social causes or raise awareness of important issues or promote positive change;
- Support sustainability – by integrating environmental and social principles into marketing strategies, the bank can contribute to a sustainable future.

7.3.2.4 Confidentiality

Confidentiality at Exim Banca Românească is essential, as the bank, through its staff, has access to sensitive information about its clients, such as financial data, transaction history, personal details, and other confidential information. Protecting this data is not only an ethical responsibility but also a legal requirement, and any breach of confidentiality can have serious consequences for the bank and its personnel.

As a personal data controller, the bank is responsible for securely storing and protecting the data it collects, in accordance with the provisions of the General Data Protection Regulation no. 679/2016, ensuring that the bank applies appropriate technical and organizational measures to comply with the principles of lawful data processing, as set out in the Regulation and the applicable national legislation.

Detailed information regarding the processing of personal data is available in the specific Information Notes provided to clients at the start of the contractual relationship, as well as throughout its duration, through publication in the digital application and on the bank's website www.eximbank.ro under the Data Protection section.

The main aspects of confidentiality at Exim Banca Românească

1. Applicable legislation and regulations

In Romanian banking legislation, **the obligation to ensure confidentiality** is clearly and thoroughly regulated. Two of the key legal acts governing this aspect are:

- **Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy**
- **NBR Regulation no. 5/2013 on reporting requirements for credit institutions**

Other relevant aspects of confidentiality in banking legislation:

- **Law no. 129/2019 on the prevention and combating of money laundering and terrorist financing** obliges banks to monitor transactions and report certain suspicious operations to the competent authorities. In this regard, despite the confidentiality obligation, banks are required to provide information in cases of financial crimes or money laundering.
- **The GDPR regulations (General Data Protection Regulation)** applicable at the European level impose on banks the responsibility to protect clients' personal data and to use it only for legitimate purposes.

2. Types of confidential information

Personal data: Name, address, personal identification number (CNP), phone number, email address, and other information that can identify a client.

Financial data: Information related to bank accounts, balances, financial transactions, loans, savings, investments, and other financial operations.

Commercial data: Information related to a client's banking relationships, loan conditions or other banking products, the client's financial strategies.

Internal information: Data related to the bank's internal policies, business strategies, and operational procedures.

3. Responsibilities of the bank and its employees

Employee confidentiality: Bank employees, regardless of their position, are required to sign confidentiality agreements. They may not disclose information about clients or the bank's internal operations without explicit permission.

Limited access: Access to confidential information is restricted and limited based on each employee's need to know such information in order to carry out their tasks.

Continuous training: Bank employees must be periodically trained on the importance of data protection, legal regulations, and internal security procedures.

4. Technical and organizational measures

The bank implements authentication procedures for accessing client accounts, such as complex passwords, and its systems are monitored to detect and prevent unauthorized access. These systems are also subject to regular audits to ensure compliance with security standards.

5. Exim Banca Românească client rights regarding confidentiality

The bank has procedures in place to manage security breaches (e.g., data leaks), including notifying the authorities and affected clients (in accordance with GDPR).

7.3.2.5 Social Inclusion of Consumers and/or End Users

The social inclusion of consumers and end users of banking products within Exim Banca Românească aims to ensure equitable and non-discriminatory access to financial services for all categories of individuals, including those who, for various reasons, are excluded from or have limited access to the financial system. In this context, the bank plays an essential role in the social integration of vulnerable clients, such as individuals with low income, pensioners, persons with disabilities, those living in rural areas, or other marginalized groups, for whom it offers specific products such as the basic payment account, with reduced or no fees for financially vulnerable/non-vulnerable clients.

Methods for promoting social inclusion in banking products

1. Accessible and tailored banking products

- Basic payment accounts;
- Accessible savings products – savings products with low minimum deposit amounts, intended for individuals who cannot save large sums, such as term deposits or savings accounts;
- Consumer loans – loans for clients who do not have a strong banking history or loans of smaller amounts relative to income level.

2. Technology and digitalization for financial inclusion

- Exim Banca Românească provides clients with an online banking platform that allows easy access to financial services and product packages, including for people in rural areas or those with reduced mobility.
- Mobile accessibility: The bank offers a Mobile Banking service that is easy to use on mobile phones, as well as Internet Banking for desktop use.

3. Accessibility for persons with disabilities

- Banking services adapted for persons with disabilities: Exim Banca Românească provides a website accessible to persons with mild visual impairments and persons with hearing disabilities.
- Personalized assistance services: In accordance with its internal regulations, Exim Banca Românească offers specialized assistance for persons with disabilities through branch staff trained to assist individuals with special needs.

4. Reducing geographical barriers

- Access to ATMs and payment terminals in strategic locations: Exim Banca Românească provides clients with ATM and MFM terminal installations in public places such as near shopping centers or markets, in or near city halls, to facilitate access for people in less urbanized areas.

5. Consumer protection and product transparency

- Clarity of terms and conditions: Exim Banca Românească presents its banking products in clear and easy-to-understand language, so that any consumer can understand the fees, interest rates, and conditions associated with a product or service.
- Consumer protection policies: The bank ensures that its products and services are not abusive and that they respect consumer rights, including transparency regarding costs and fees associated with each transaction.

In conclusion, social inclusion in the banking sector represents an important step toward ensuring a fair and accessible financial system for all categories of consumers, regardless of their economic, social, or geographic status. Exim Banca Românească adopts specific measures aimed at:

- Reducing inequalities: access to financial services allows individuals from disadvantaged groups to save, invest, and better manage their finances, which contributes to reducing economic inequalities.
- Improving financial stability: access to adequate banking products can help individuals make informed financial decisions, contributing to better financial resource management and long-term stability.

The Compliance Department identifies and notifies internal structures regarding legislative changes in order to align internal regulations with legal requirements.

7.3.2.6 Adoption of Measures Regarding Significant Impacts on Consumers and End Users and Approaches to Managing Significant Risks and Pursuing Significant Opportunities Related to Consumers and End Users, as Well as the Effectiveness of These Measures – S4-4

The adoption of measures regarding significant impacts on consumers and end users, the management of significant risks related to them, and the pursuit of significant opportunities are key aspects of the strategy, especially in the current context of rapid market and consumer demand changes. The Bank aims to implement such measures to protect consumer interests, minimize risks to the bank, and capitalize on growth opportunities. These measures include: personal data protection, with the bank implementing security measures to protect consumer data, thereby preventing risks related to security breaches; ensuring clear and transparent communication with consumers—notifications about changes in products, terms and conditions, or product updates help manage expectations and reduce confusion and dissatisfaction.

Regarding the pursuit and capitalization of significant opportunities, Exim Banca Românească continuously invests in innovation and in adapting to market demands: anticipating changes in consumer preferences, developing functionalities for remote banking applications (Internet/Mobile Banking), and creating market-aligned products improve the user experience and help the bank better respond to market demands.

7.3.2.7 Targets Related to the Management of Significant Negative Impacts, the Promotion of Positive Impacts, and the Management of Significant Risks and Opportunities – S4-5

Regarding targets related to the management of significant negative impacts, the promotion of positive impacts, and the management of significant risks and opportunities, the bank currently uses a series of indicators related to operational risk, including indicators for the number of customer complaints. These indicators have specific allocated thresholds that monitor whether the associated risks fall within the bank's established risk appetite and tolerance. A five-level monitoring scale is used: low, low-medium, medium, medium-high, and high. In cases where these indicators exceed the assumed thresholds, mitigation plans are implemented.

7.4 Governance Information

7.4.1 Professional Conduct

7.4.1.1 Corporate Culture and Policies Regarding Professional Conduct and Corporate Culture – G1-1

Exim Banca Românească has established as a strategic and organizational objective the development and consolidation of a corporate culture based on performance and staff development, whose awareness and assumption encourage team members to make greater efforts to achieve business objectives, starting from:

- the mission of Exim Banca Românească – increasing prosperity in Romania, building sustainable partnerships for the social welfare and economic performance of clients by accelerating financial intermediation.
- the vision of Exim Banca Românească – we have an appetite for innovation and development and, as a solid credit institution, we aim to offer personalized financial solutions to our clients that confirm our status as a preferred banking partner in Romania. We make the most of the resources and market position we hold in the banking sector, we focus on stimulating the business potential of our clients and contribute significantly to the sustainable

development of Romania's economy and to the consolidation of the Romanian banking system. Moreover, we are convinced that the performance of any organization is closely linked to the level of development of the community in which it operates and the social environment, so we continue to be actively involved in projects that contribute to the development of an educated and healthy society, with respect for the environment and sustainable development, building together the future of Romania.

Internal regulations regarding professional conduct

The management body of Exim Banca Românească has adopted and promotes at the bank level ethical and professional standards that define conduct in carrying out activities, prohibiting or, as appropriate, adequately limiting activities, relationships, or situations that could reduce the quality of the governance framework.

Business ethics and responsibility are fundamental principles that guide the organization in its interactions with stakeholders and society in general. Respecting ethical standards involves making decisions that prioritize integrity, fairness, and honesty in all business practices. It also involves recognizing the impact of business activities on various stakeholders, including employees, clients, suppliers, and the community.

Ethical values and generally accepted principles of professional conduct are incorporated into the *Code of Ethics for Exim Banca Românească personnel*.

In addition, the bank has developed:

- *Code of Conduct applicable to dealers within Exim Banca Românească;*
- *Code of Ethical Conduct for Internal Auditors;*
- *Code of Ethical Conduct for the Compliance Department staff.*

The Code of Ethics for Exim Banca Românească personnel expresses the values, ethical and corporate principles promoted within the bank. It promotes a culture of integrity by following a model of professional ethics and supports the formation and implementation of ethical values, responsible behaviors, and actions within the bank.

The Code of Conduct applicable to dealers within Exim Banca Românească ensures the adoption at Exim Banca Românească level of the main principles and rules of conduct and good practice included in the Model Code (The International Code of Conduct and Practice for the Financial Markets), developed by ACI (The Financial Markets Association), applicable to trading activities on over-the-counter (OTC) markets in the fields of foreign exchange, money markets, and derivative instruments. The Code includes market procedures and practices and outlines the standards of integrity and professionalism recommended to all participants in global financial markets to maintain them within an orderly and efficient framework through the use of a common language and rules for communication and trading.

The Code of Ethical Conduct for Internal Auditors includes the relevant principles for the profession and practice of internal auditing and the rules of conduct that describe the expected behavior of internal auditors. The purpose of the Code of Ethics is to promote an ethics-based culture in the internal audit profession.

The Code of Ethical Conduct for the Compliance Department staff represents the set of principles and rules that must govern their activity. The purpose of the Code is to create the ethical framework necessary for the performance of the profession. Within the bank, ethical principles, moral integrity, and professional and transparent behavior are promoted through the awareness and compliance by all employees with the provisions of the Code of Ethics of Exim Banca Românească's personnel, the awareness of staff regarding the legal consequences of bribery, the means to recognize and the obligations to report such acts, and the identification and management of conflicts of interest in accordance with the Policy on the management of conflicts of interest within the bank.

Through its implemented strategy and policies, the bank has assumed social responsibility for the impact it has on the environment and the community and directs its activity in such a way as to contribute to solving social and environmental issues.

Employee involvement was achieved through training activities promoting transparency regarding sustainability concepts (this allows stakeholders to understand the organization's actions and decisions and to evaluate them objectively). Employee involvement is reflected both in customer relations (identifying sustainable financing opportunities, promoting products and consulting in the field of sustainability), and in the way the bank's resources are used (recycling, energy consumption, paper, waste, etc.).

Furthermore, during 2024, the bank collaborated with other entities interested in sustainability (consulting firms), a process that contributed to the exchange of best practices and increased the positive impact on the bank's activities. Through the organization of training sessions or awareness programs, the organization contributes to the development of a responsible environmental mindset and to increasing employee engagement in sustainable practices.

Members of the management body of Exim Banca Românească possess appropriate professional knowledge, good reputation, honesty, integrity, and independent thinking, regardless of the tasks and responsibilities associated with their respective positions, including the role held within the management body and its supporting committees, and including matters related to the code of conduct.

The annual professional training plan forms the basis for defining and implementing training programs, with objectives set both in terms of professional skills development and business development, as well as compliance with legal requirements in this area and with corporate governance requirements, including business conduct. The elements regarding training and skill development at bank level are detailed in Chapter 7.3.1.2.2.

In Chapter 7.4.1.4, the bank's structures exposed to personnel-related risks have been identified; however, all employees as well as members of the management body must be aware of and comply with its provisions. Any deviation from the provisions of the codes constitutes a disciplinary offense and, consequently, the disciplinary procedure shall apply (G1-1_02, G1, G1-1, 10a).

Disciplinary sanctions that the bank may apply through disciplinary committees are as follows:

- a. written warning;
- b. demotion, with the granting of the salary corresponding to the position to which the employee has been demoted, for a period not exceeding 60 (sixty) days;
- c. reduction of the base salary by 5–10% for a period of 1–3 months;
- d. reduction of the base salary and/or, as applicable, of the management allowance by 5–10% for a period of 1–3 months;
- e. disciplinary termination of the Individual Employment Contract (IEC).

In order to promote an organizational environment based on fairness and professional, ethical employee conduct, tools have been developed to mitigate risks related to conflicts of interest, fraud, and corruption:

- *Policy on the management of conflicts of interest within Exim Banca Românească*
- *Anti-fraud Policy*
- *Policy on combating bribery in officially supported export credit*
- *Internal/external whistleblowing channel within Exim Banca Românească*
- *Policy on transparency requirements and disclosure of information.* (G1.GOV-1_02, G1, G1.GOV-1, 5a)

7.4.1.2 Whistleblower Protection

In accordance with the provisions of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No. 648/2012, as well as National Bank of Romania Regulation No. 5/2013 on prudential requirements for credit institutions, Exim Banca Românească has implemented a whistleblowing channel (G1-1_08, G1, G1-1, 10d), an internal/external whistleblowing mechanism that can be used to report actual or potential breaches of internal/legal provisions that have occurred or are likely to occur.

Any legitimate concern, fear, or observed irregularity may be reported internally, either verbally or in writing, as well as anonymously, at the employee's discretion, through the following methods:

1. **In writing** – by post, to the address: 3 Ion Mincu Street, Sector 1, Bucharest (for the Compliance Department);
2. **Via electronic channel** – through the IT system, at the email address alertare@eximbank.ro, managed by the Compliance Department;
3. **Any other electronic means** capable of transmitting the text or audio message to the Compliance Department.

Persons who report actual or potential breaches shall receive, if possible (e.g., if the report is not submitted anonymously), an acknowledgment of receipt within a maximum of 7 calendar days from receipt.

The Compliance Department ensures the receipt, centralization, investigation, and reporting of alerts at the bank level, maintaining confidentiality regarding the identity of the employee who exercised the right to whistleblow and protecting their personal data. When the internal whistleblowing right concerns legitimate and substantive concerns related to the activities of the Compliance Department personnel, the whistleblowing right shall be exercised directly with the bank's Executive President.

7.4.1.3 Supplier Relationship Management, Including Payment Practices – G1-2, G1-6

Within the bank, the general management of procurement is the responsibility of the Procurement, Contracts and Taxation Department (DACF), except for certain specific categories. Thus, legal services, human resources, and marketing and advertising activities fall under the coordination of their respective departments.

Each of these structures is responsible, with due diligence, for managing all aspects related to the procurement of products and services. They apply the necessary care to ensure that all purchases are made in accordance with the law and protect the bank's interests. DACF is responsible for defining the procurement policies and procedures and for implementing them, continuously adapting them to the organization's needs. The specifications documents represent the means through which the bank informs suppliers about its requirements regarding ethics, transparency, payment terms, confidentiality, and intellectual property rights. Additionally, these documents define the bank's expectations regarding compliance with fundamental labor principles, environmental protection, and business ethics.

A core principle of the bank's responsible procurement policy is the selection of suppliers based on the comparison of at least three distinct offers obtained from independent bidders. In the case of the purchase of new goods or services, the bank requires obtaining an opinion regarding conflict of interest, in accordance with the provisions of the Policy on Managing Conflicts of Interest, thus ensuring transparency in the procurement process and preventing reputational risks.

The bank's suppliers are required to respect the principle of business continuity, ensuring the constant delivery of products and services necessary for both critical and non-critical activities. This requirement is included in the offer selection process and is later integrated into contractual terms. Furthermore, the bank actively promotes sustainability principles in its supplier relationships, following two major directions: gradually integrating ESG criteria into the selection process for new suppliers and collecting additional information regarding the sustainability commitments of existing suppliers. Thus, the bank gradually implements ESG assessments within ongoing risk evaluations for key product and service suppliers.

For the selection and verification of suppliers, the bank requires ISO 9001 and ISO 45001 certifications, while the possession of ISO 14001 and ISO 20400 certifications serves as a qualitative evaluation criterion. Moreover, factors such as the energy efficiency of products, the existence of a recycling policy, compliance with labor and health conditions for employees, and involvement in social responsibility and environmental protection activities are essential in the supplier selection and contracting process.

The bank has established clear standards in areas such as human rights, working conditions, environmental and climate protection, anti-corruption, and unacceptable behavior, including human rights violations, involvement in bribery, corruption, and fraud. It is also essential for the bank's suppliers to comply with applicable national legislation. These standards have been implemented to reduce risks associated with the bank's value chain. The ability of suppliers to assume and implement these commitments is a key criterion in evaluating business relationships.

In 2024, there were no significant changes in the localization of the bank's supply chain.

The bank applies the same standards to the selection of new suppliers as well as to maintaining relationships with existing ones. Using a risk-based approach, the bank continuously monitors the compliance of suppliers and their subcontractors with the responsible procurement policy.

In 2024, the bank conducted verifications on selected suppliers without identifying the need for additional measures.

If the bank finds that a supplier or its subcontractor does not comply with the bank's regulations, a dialogue will be initiated to clarify the situation. In cases of non-compliance, the bank will encourage, where possible, the improvement of social, ethical, and environmental conditions. If these measures are ineffective, the bank will reassess the future of the collaboration and may decide to reduce, suspend, or terminate it.

The bank's procurement activity also reflects the concern for promptly receiving works and acquisitions and for making timely payments to all involved parties.

The bank is committed to respecting the general procurement principles established through internal procedures and to ensuring the clarity and compliance with contractual terms. At the same time, it requires suppliers to comply with environmental regulations, to hold valid ISO certifications as mentioned, and to adopt measures to minimize the environmental impact of their activities. In this context, the development of green technologies and the reduction of the carbon footprint across the entire life cycle of the supplied products and services are encouraged.

Payment practices

The Bank has an internal procedure that regulates, among other things, the payment practices in its relationship with suppliers, this being approved at the level of the Management Committee. It is applied to all categories of suppliers, without distinguishing based on their size.

Invoice payments on behalf of the Bank are made at maturity, according to the invoice issuance terms set by the suppliers. On average, the payment terms for the main types of acquisitions are as follows:

- Utilities – 20 days
- Cleaning services – 60 days
- Rent – 5–10 working days
- Automotive fuel – 15 days
- Security services – 30 days
- Medical services – 10 days
- Telecommunications services – 30 days
- IT maintenance – 30 days

The Bank pays invoices on time and there are no judicial proceedings related to delays in making payments.

7.4.1.4 Corruption and Bribery – G1-1, G1-3, G1-4

Exim Banca Românească has adhered to the fundamental values, principles, objectives, measures, and monitoring mechanism of the National Anti-Corruption Strategy 2021–2025, a strategy aligned with all international anti-corruption instruments to which Romania is a party (MCV, GRECO, UNCAC, RAI).

In the conduct of its activities and in its relationships with bank personnel, clients, or collaborators, it is forbidden to conclude transactions/contracts in the name of the bank through bribery or other acts of corruption.

The bank maintains a zero-tolerance policy towards all acts of corruption, condemns corruption in all its forms, and firmly expresses its commitment to continue anti-corruption efforts through appropriate legal means, aiming to implement anti-corruption measures to ensure effective control over the bank's activities.

The implementation of the Anti-Corruption Strategy requires that all employees and members of the bank's management body, as well as all persons and entities that engage in business relations with the bank or its subsidiaries (clients, suppliers, agents, etc.), are aware of, understand, and comply with the commitment to prevent and combat acts of corruption and conduct themselves in accordance with ethical standards, applicable legislation, and contracts.

The bank promotes ethical, impartial, and non-discriminatory behavior in its interactions with all stakeholders. To achieve this objective, the bank has implemented the Exim Banca Românească Staff Code of Ethics, accessible to all employees and published on the bank's website.

Exim Banca Românească has adopted all necessary measures to avoid potential conflicts of interest and/or incompatibilities, potential acts of corruption, as well as to prioritize the public interest over any other interest, in accordance with the principle of transparency in decision-making and unrestricted access to public interest information.

The bank ensures the conditions for continuous training and testing for all staff (100%), including those in risk-prone structures, through a specially developed web application designed to meet ongoing training needs.

In this regard, the bank has identified structures exposed to the risk of conflicts of interest and various forms of corruption at all levels of personnel:

a) At the level of business lines

This category includes staff managing client relationships within the Corporate Division – Large Clients and Project Financing, Corporate Network Division, Treasury and Financial Markets Division, Financing, Guarantees and State Account Insurance Division, and the Retail Division.

Direct interaction with the bank's clients increases the risk of conflicts of interest, which is why this staff category requires heightened attention. Client advisory activities, negotiations, offer transmission, business line approvals, or contract signing must be conducted with diligence, always pursuing the bank's best interests.

In conducting these activities, it is strictly forbidden to accept gifts or other benefits from clients, as well as to take excessive risks or violate internal regulations to meet set objectives.

b) At the level of support functions

The level of exposure to potential conflicts of interest in this organizational tier varies significantly depending on the specifics of the activities and the level of authority held by each structure.

Among these, higher risks have been identified in the following: Asset Management Directorate, Procurement, Contracting and Taxation Directorate, Human Resources Directorate, Marketing and Corporate Image Department, and Legal Directorate.

c) At the level of internal control functions

Staff in internal control roles (Audit, Risk, and Compliance) are prohibited from using information obtained through their specific activities for personal gain or for the benefit of third parties.

Independent internal control functions are organizationally separated from the activities they are assigned to monitor and control.

7.4.1.4.1 Detection

The anti-fraud and anti-corruption policy and culture are promoted and supported by the management of Exim Banca Românească through the following actions and measures, adapted to the specific context at the bank level:

- establishing control methods such as cross-checks, higher levels of authorization for certain operations;
- exercising internal control in accordance with competencies, in order to efficiently manage the fraud risk associated with specific activities, through the involvement of organizational structure managers;
- verifying suppliers of products and services and ensuring a procurement process that respects the principles of equal treatment, non-discrimination, proportionality, and mutual recognition;
- implementing an internal/external whistleblowing mechanism to be used within the bank for reporting actual or potential violations of internal/legal provisions that have occurred or are likely to occur. (G1-1_05, G1, G1-1, 10c) See the provisions of Chapter 7.4.1.2.

7.4.1.4.2 Training

The periodic training and instruction of personnel represent an essential tool for preventing acts of corruption, by raising employees' awareness of what constitutes acceptable ethical and professional standards, the risks and impact that acts of corruption may have on the reputation and assets of Exim Banca Românească and EximAsig, as well as the applicable sanctions in such cases.

Periodically, at least once a year, the bank's employees participate in internal awareness programs covering topics such as the anti-corruption strategy, internal/external whistleblower rights, identification, management and reporting of conflicts of interest, internal/external fraud, compliance with the Staff Code of Ethics, and customer complaint management. (G1-3_06, G1, G1-3, 21a)

7.4.1.4.3 Prevention

The main tools through which Exim Banca Românească ensures the prevention of acts of corruption are: a rigorously designed governance framework based on sound governance principles and a transparent environment in relation to stakeholders.

The measures identified by the governing body – as remedies for institutional risks and vulnerabilities to corruption – are included in the Integrity Plan.

The bank undertakes a series of actions and measures to prevent acts of corruption, such as:

- Promoting an anti-fraud organizational culture through:
 - o awareness and compliance with the provisions of the Code of Ethics;
 - o employee awareness of methods for detecting fraud, types of fraud, reporting obligations, legal consequences through training at the time of hiring and periodically, according to the Annual Training Plan;
- Appropriate allocation of responsibilities, competencies, and objectives. Employees are assigned achievable objectives so that, in achieving them, they act ethically and in accordance with internal regulations and applicable legislation;
- Promoting a culture of avoiding conflicts of interest, so that members of the governing body and employees, in the exercise of their duties, act in the interest of the institution without pursuing personal, financial, or other interests and do not use their position to obtain undue benefits for themselves, their families, or close associates;
- Promoting the principle of moral integrity among staff, both through recruitment methods that prevent hiring individuals with criminal connections and by encouraging professional conduct aligned with high standards of ethics and professionalism;
- Informing and obtaining declarations from exporters and commercial banks, in the activity of officially supporting export credits, regarding the legal consequences of bribery of Romanian and foreign public officials and the private sector;
- Applying disciplinary sanctions for violations of internal regulations without discrimination.

7.4.1.4.4 Incidents

The bank's management is informed about any potential or actual acts of corruption that occur within the organization and that may be or are identified as resulting from:

- conflicts of interest;
- non-compliance with the Staff Code of Ethics;
- the internal whistleblowing channel;
- customer complaints.

Additionally, within the quarterly Activity Reports, the Compliance Department informs the institution's governing body about identified incidents and the measures taken to mitigate the risks generated by them.

In the course of 2024, there were no incidents, allegations, or fines related to acts of corruption involving the bank's employees or members of its governing bodies.

2024

The image features a minimalist design with the year '2024' in a bold, dark blue sans-serif font. The text is positioned in the lower half of the frame. Below the text, the background transitions into a series of overlapping triangles in various shades of blue, creating a dynamic, geometric pattern that fills the bottom half of the image. The top half of the image is a solid, light blue color.

2024

EXIM BANCA ROMÂNEASCĂ'S
ACTIVITY IN THE NAME AND
ON BEHALF OF THE STATE

8. EXIM BANCA ROMÂNEASCĂ'S ACTIVITY IN THE NAME AND ON BEHALF OF THE STATE

8.1 General Regulatory and Operational Framework for the Activity in the Name and on Behalf of the State

Exim Banca Românească carries out mandate operations in the name and on behalf of the state (NCS), in accordance with the *Law no. 96/2000 on the organization and functioning of EximBank S.A.*, republished, as subsequently amended and supplemented, and within the limits of the competences approved by the Interministerial Committee for Financing, Guarantees and Insurance (C.I.F.G.A.), established under *Government Decision no. 534/2007 on the establishment, responsibilities, competences and functioning of C.I.F.G.A. and the regulation of financing, guarantee and insurance operations carried out by EximBank in the name and on behalf of the state*, republished, as subsequently amended and supplemented.

For the purpose of fulfilling the mandate provided by law, the general operational framework for the activity in the name and on behalf of the state includes:

- A distinct organizational structure, mandated to carry out the activity in the name and on behalf of the state, within which the core functions are exercised in accordance with financial-banking regulations; in this respect, the Board of Directors of Exim Banca Românească approves the organizational and operational framework for the mandate activity carried out in the name and on behalf of the Romanian state, ensuring separation from the activity carried out on its own behalf and account, both from an organizational and functional point of view;
- Responsibilities and duties of the advisory and decision-making bodies, namely C.I.F.G.A. and the NCS Approval Committee, of the internal structure directly involved in the activity in the name and on behalf of the state, as well as of other internal structures within Exim Banca Românească that provide contractual support for this activity;
- A set of policies, rules, and procedures that regulate and define the specific activities in the name and on behalf of the state as provided by law and the corresponding operational flows.

8.2 Coordinates of the Activities Carried Out by Exim Banca Românească in the Name and on Behalf of the State from the Perspective of Sustainable Development Objectives

Integrated with the general risk management framework and similar to other European institutions acting in the name and on behalf of the state, Exim Banca Românească has developed the *Sustainable Development³ Policy* based on the following programmatic documents: *the UN 2030 Agenda for Sustainable Development*, *the Paris Agreement on Climate Change* ratified by Romania through Law no. 57/2017, *the European Green Deal⁴*, *the EU Taxonomy⁵*, *the "Fit for 55" package⁶*, and *the EU Action Plan: Financing Sustainable Growth⁷*.

By implementing this Policy, Exim Banca Românească includes sustainable development as an integral part of all activities carried out in the name and on behalf of the state. Thus, the general financial risk assessment framework is extended through the integration of sustainability-related risks into financing, guarantee, and insurance activities, by considering — both at an individual level and at a portfolio level — the impact of sustainability-related risks as well as the impact on the environment, people, and society when evaluating the activities for which support is requested through Exim Banca Românească instruments.

³ United Nations Sustainable Development – 17 Goals to Transform Our World

⁴ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, and the Committee of the Regions on the European Green Deal, COM (2019) 640

⁵ Regulation (UE) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (UE) 2019/2088 (UE Taxonomy).

⁶ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions – „Fit for 55”: delivering the EU's 2030 climate target on the way to climate neutrality, COM (2021) 550

⁷ Communication from the Commission to the European Parliament, the European Council, the Council, the European Central Bank, the European Economic and Social Committee, and the Committee of the Regions, COM (2018) 97

According to the provisions of the *Policy*, **sustainable development objectives** are included in all financing, guarantee, and insurance activities carried out by Exim Banca Românească in the name and on behalf of the state, aiming at:

- Prioritizing the allocation of state funds for sustainable projects;
- Managing financial risks arising from climate change, resource depletion, environmental degradation, and social issues;
- Promoting transparency and a long-term vision.

Regarding the management of sustainability-related risks, the following steps of the process have been established:

1. Selection – involves gathering information based on the Financing, Guarantee or Insurance Request submitted by the applicant/their bank, aimed at identifying those activities that will be subject to classification and effective sustainability assessment;
2. Classification of activities – activities with low, moderate, or high risk;
3. Evaluation, as an integral part of the analysis process of a financing/guarantee/insurance request, within the context of evaluating all categories of risks associated with the respective operation, with the final purpose of substantiating the proposal to approve the instrument supporting the transactions.

In relation to the economic activities for which the granting of financing, guarantee or insurance products is requested, Exim Banca Românească classifies these activities into the following categories from a sustainability perspective: low-risk activities, moderate-risk activities, high-risk activities.

The evaluation process is based on sustainability factors, identified as environmental, social, and governance (ESG) factors.

Annually or whenever necessary, Exim Banca Românească submits relevant information to the supervisory and control authorities, the European Commission, and the OECD regarding the application of sustainable development principles in the activities carried out in the name and on behalf of the state.

Furthermore, Exim Banca Românească provides, in a clear, balanced, accurate, and timely manner, all relevant stakeholders (including shareholders, employees, clients, and the general public) with key information necessary to assess the application of sustainable development principles in the activities carried out by Exim Banca Românească in the name and on behalf of the state. Transparency is ensured by publishing relevant publicly-interest data in the annual activity report and on the website www.eximbank.ro.

Regarding new products developed in the context of sustainability, in the first part of 2024 Exim Banca Românească, in the name and on behalf of the state, introduced a new export receivables insurance product, the Green Insurance, which covers supplier credits or buyer credits intended for medium- and long-term projects that contribute to reducing or adapting to climate change. These include sustainable energy production, projects aimed at replacing fossil fuels, energy efficiency, carbon capture, utilization and storage (CCUS), energy transport, distribution and storage, clean hydrogen and ammonia, low-emission production processes, low- and zero-emission transport, and clean energy from minerals and ores.

8.3 The Role of Exim Banca Românească in Romania's OECD Accession Process

Romania became a candidate country for accession to the Organisation for Economic Co-operation and Development (OECD) in January 2022, thus officially initiating the accession process to this organisation, and Exim Banca Românească, as the export credit agency, was designated as the focal point for the field of export credits.

In view of this position, as Romania's *export credit agency (ECA)*, Exim Banca Românească, in the name and on behalf of the state, applies four OECD instruments, namely:

1. *The OECD Arrangement on Officially Supported Export Credits (OECD Legal 5005);*
2. *The Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence ("Common Approaches") (OECD/LEGAL/0393);*
3. *The Recommendation of the Council on Bribery and Officially Supported Export Credits (OECD/LEGAL/0447) – instrument shared with the Ministry of Justice;*

4. The Principles and Guidelines to Promote Sustainable Lending Practices in the Provision of Official Export Credit to Lower Income Countries (OECD/LEGAL/0442).

The full alignment of Exim Banca Românească's policies and regulations, in the name and on behalf of the state, with these four OECD instruments represents a *sine qua non* condition for obtaining formal approval from the OECD Working Party on *Export Credits* and Credit Guarantees Secretariat, which marks the conclusion of the "export credits" sub-chapter of the OECD Trade Chapter.

In 2024, Exim Banca Românească updated its policies and regulations, in the name and on behalf of the state, regarding the official support for export credits, in line with amendments to the OECD instruments and best practices of the Arrangement Participants and members of the OECD Working Party on Export Credits and Credit Guarantees. These changes were communicated to the OECD Working Party Secretariat for inclusion in the "*Technical Assessment Report of Romania on Officially Supported Export Credits*". The report is expected to be finalised during 2025.

8.4 Strategic Options for the Activity Carried Out in the Name and on Behalf of the State from a Sustainability Perspective

Taking into account Romania's objectives and commitments under the *2030 National Strategy for Sustainable Development, the Integrated National Energy and Climate Plan (INECP) for the period 2021–2030*, as well as at the level of the European Union and the Organisation for Economic Co-operation and Development (OECD) in the field of official export credit support, Exim Banca Românească, in the name and on behalf of the state, as *Romania's Export Credit Agency*, evaluates all requests for the granting of financing, guarantee, and insurance products from the perspective of their sustainability.

Thus, Exim Banca Românească NCS continues the strategic approach initiated in 2021, through which it does not grant products intended for the official support of export credits in the name and on behalf of the state for export contracts related to the development of coal-fired power generation plants or related equipment for existing ones. By 2026, the Bank will develop and implement the carbon emissions calculation methodology, including the carbon footprint calculation methodology, as well as the methodology for monitoring greenhouse gas (GHG) emissions resulting from export projects using fossil fuels, applicable to the portfolio of products intended for official export credit support.

Subsequently, starting with 01.01.2032, Exim Banca Românească NCS will no longer grant official export credit support products in the name and on behalf of the state for exploration, production, transportation, storage, refining, and distribution projects of fossil fuels (coal, oil), nor for power generation projects using unabated methods. The same measures will apply to gaseous fuels by the year 2050.

As part of its ongoing effort to align with international approaches to combating climate change, the Bank has updated the procedure for assessing the environmental and social impact of projects that benefit from official support from Exim Banca Românească NCS, by including the assessment of the impact on the respect for human rights in countries with a high risk of violations of international conventions, detailing the checks to ensure compliance with the environmental standards of the export destination country, completing the procedure for monitoring the implementation of projects classified in Category A and B, both during construction and implementation, including in the annual Portfolio Report of the Division for Financing, Guarantees, Insurance Name and State Account information on the monitoring of the experience gained from applying the environmental and social impact assessment process and ensuring ex-post transparency of transactions classified in categories A and B, by making relevant information available on the website www.eximbank.ro.

Taking into account the objectives and commitments undertaken by Exim Banca Românească through adherence to the National Anti-Corruption Strategy and the principles set out in the OECD Council Recommendation on combating bribery and officially supported export credits, in 2024 Exim Banca Românească NCS updated the information requirements for exporters and interested parties regarding the consequences of acts and facts of corruption:

- Exim Banca Românească informs exporters and, where applicable, other relevant parties about the legal consequences of acts of bribery in international commercial transactions in accordance with Romanian legislation, including those concerning bribery of foreign and Romanian public officials, as well as bribery in the private sector;
- Exim Banca Românească encourages exporters and other relevant parties, where applicable, to develop, implement, and document adequate control systems to prevent and identify acts of bribery;
- Exim Banca Românească encourages exporters to raise awareness that parties involved in international commercial transactions must also comply with and observe all relevant laws and regulations prohibiting acts of bribery in the state or jurisdiction in which they operate and in the country or jurisdiction where the project is or will be implemented;
- Exim Banca Românească promotes responsible business conduct of all parties involved in requesting official support for an export credit;
- Exim Banca Românească develops, implements, and documents adequate control systems within the officially supported export credit activity, aimed at discouraging acts of bribery in international commercial transactions and supported by appropriate staff training, reporting mechanisms, and internal audit procedures.

The annual Portfolio Report of the Division for Financing, Guarantees, Insurance Name and State Account includes information on the description of officially supported transactions for which the provisions of internal procedures and the measures/actions taken have been applied, as well as any proposals for revising/completing the policies and procedures regarding the fight against bribery, in order to ensure their effective implementation and alignment with national/international standards and practices in the field.

In situations where Exim Banca Românească identifies risks related to acts of bribery or has reason to believe that the export transaction may have involved acts of bribery or in order to eliminate any suspicion regarding such acts, Exim Banca Românească may also take into account reports available within the National Contact Point for Responsible Business Conduct, according to the procedure included in the OECD Guidelines for Multinational Enterprises.

In order to align with the National Contact Point for Responsible Business Conduct in accordance with OECD requirements, through Government Decision no. 1430/2024, Exim Banca Românească has been included in the list of permanent invitees to its meetings.

At the same time, for the entire portfolio, efforts were made to improve the capacity for processing requests and to increase efficiency in their analysis through:

- the review and simplification of flows as a result of the good practices acquired;
- the development, streamlining, and digitalization of processes and products.

BOARD OF DIRECTORS

President,

Andrei Răzvan Micu



ROMANIA IS GROWING WITH US!

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