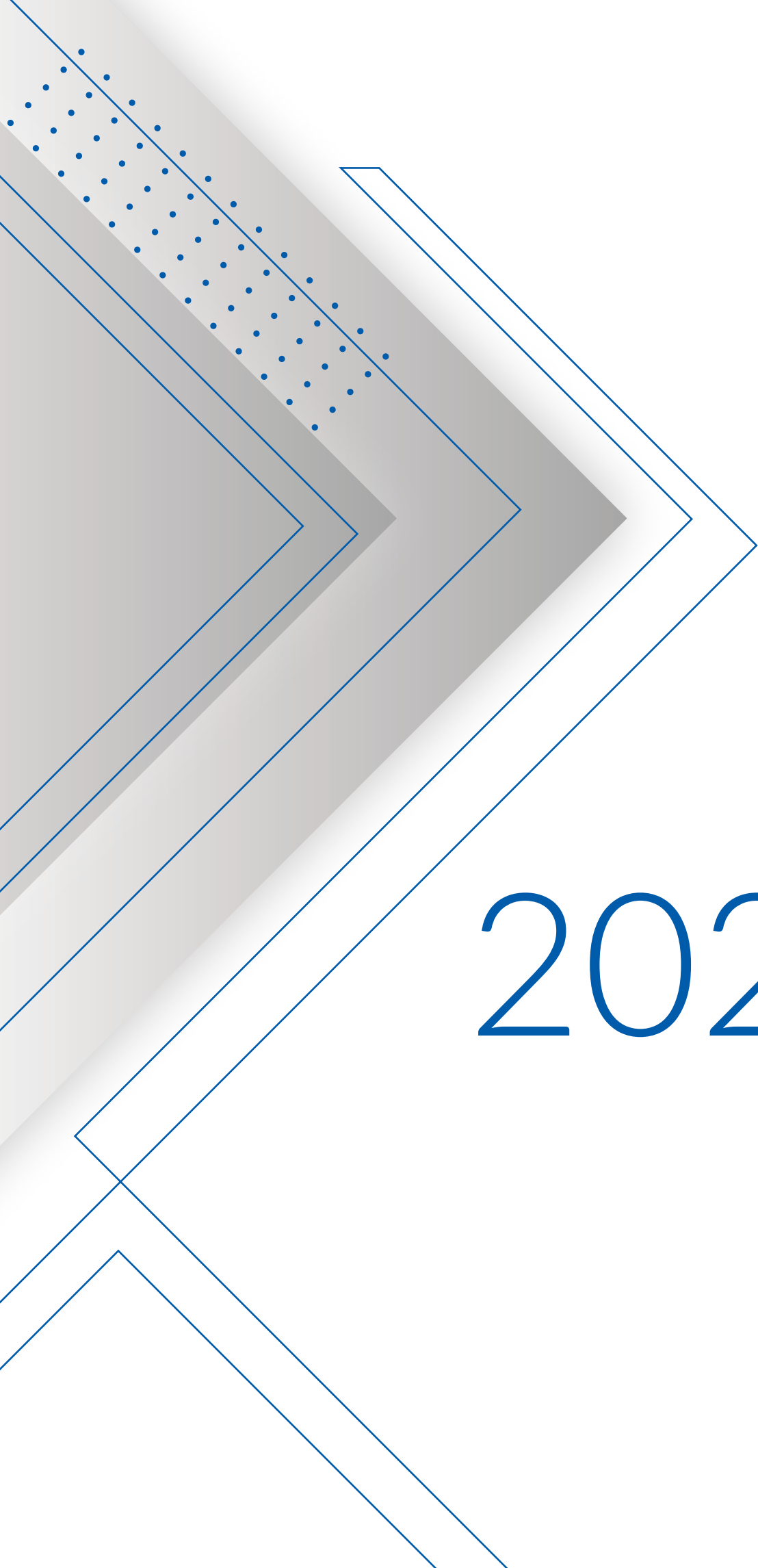




# ANNUAL REPORT 2025



2025



## Traian Halalai Executive President

2025 was an important year for Exim Banca Românească: a year of solid results, consolidation and preparation for a new stage of growth. The performance achieved confirms the solid direction we have been following for over 13 years and which strengthens our position among the top banks in Romania.

In a complex context, marked by an intense competition, but also by volatility and pressure on costs, we managed to maintain a healthy balance between growth, profitability and prudence, strengthening our position in the key business segments.

The results speak for themselves: the Bank's net profit increased by 90%, to 139 million lei, while assets exceeded 29,4 billion lei.

Two major milestones defined the year: the share capital increase, which strengthens our growth capacity, and the completion of the consolidation of the Core Banking system – the foundation for a modern, efficient and scalable operating model.

As a Romanian bank, we have assumed a clear role: to support the economy and contribute to the well-being of Romanians. We financed companies, supported investments and entrepreneurship and, at the same time, helped Romanians turn their personal plans into achievements.

We grew consistently across both segments: in corporate, by financing investment projects and supporting SMEs, including through partnerships with European institutions; in retail, through very good dynamics in mortgage and consumer loans, with a direct impact on the lives of our customers.

At the same time, we accelerated digital transformation and continued to integrate ESG principles into our activity, developing sustainable financing solutions and strengthening the risk management framework.

We look ahead with confidence and, in 2026, we aim to accelerate: more financing for companies, more support for customers, simpler processes and a better digital experience. We will grow responsibly, with a focus on sustainable results and real impact in the economy.

I thank my colleagues for their professionalism and commitment, our customers for their trust and our shareholders for their support of our strategic direction.

We continue to build a solid, modern and relevant Romanian bank for the banking sector and for the economy.

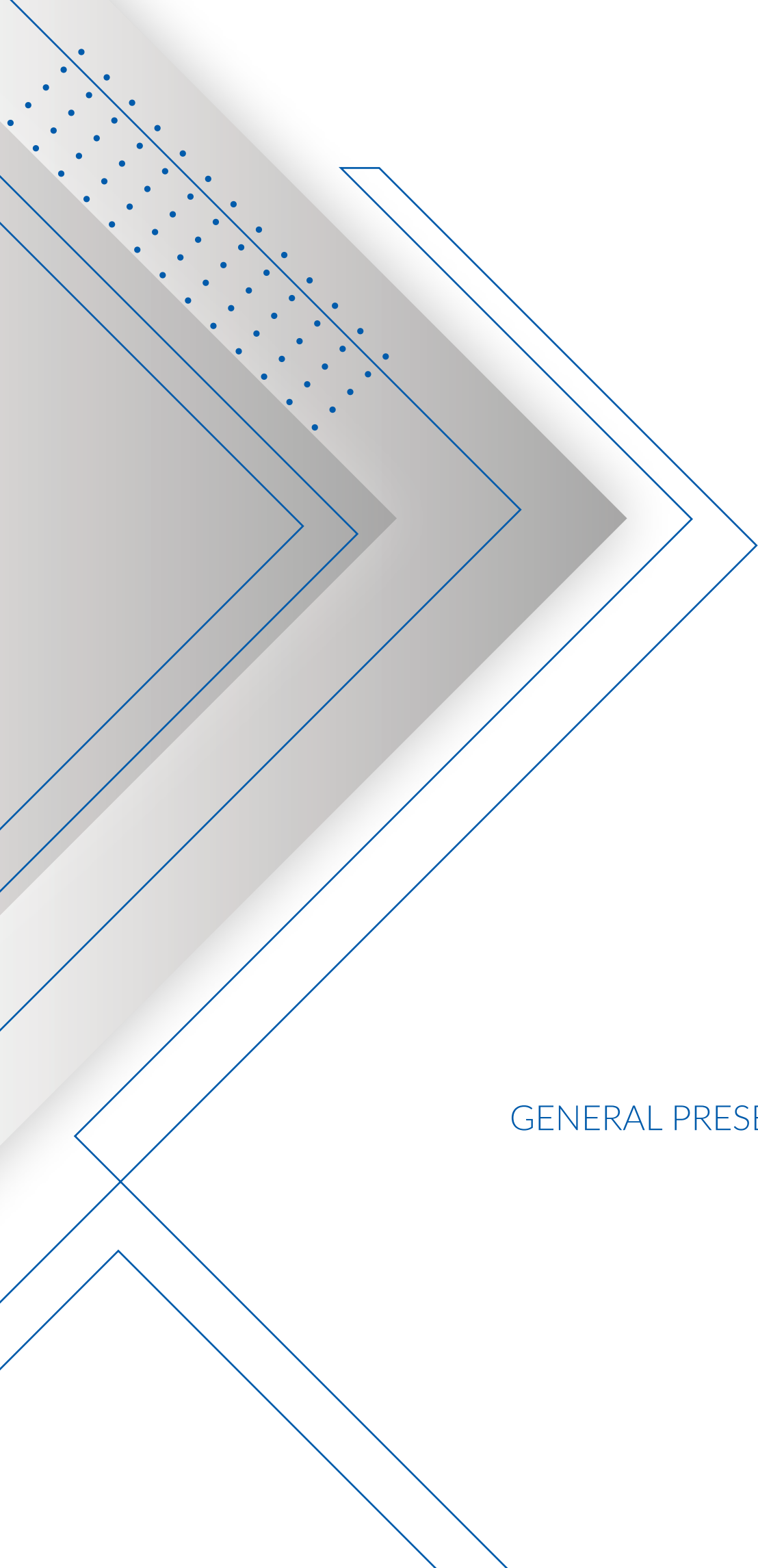
**Romania is growing with all of us!**



BOARD OF DIRECTORS' REPORT  
FOR THE FINANCIAL YEAR ENDED  
31 DECEMBER 2025

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## 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 conducts its activity in accordance with Law no. 96/2000, republished, as subsequently amended and supplemented, with the provisions of banking legislation, with the provisions of Companies Law no. 31/1990, republished, as well as with its own Articles of Association. Exim Banca Românească S.A. is a significant credit institution included in the category of Other Systemically Important Institutions (O-SII).

Exim Banca Românească has operated as a universal bank since 31 December 2022, following the completion of the merger by absorption between EximBank – the absorbing entity and Banca Românească – the absorbed entity. The completion of the merger was followed, in 2023, by a rebranding process through which the bank changed its name to Exim Banca Românească S.A.

Independently of the components specific to a universal bank, Exim Banca Românească S.A. is the only commercial bank in Romania acting as an agent of the State in the segment of State financing, guarantees and insurance. The activity carried out in the name and on behalf of the State is functionally separated from the commercial banking activity, the operations carried out in the name and on behalf of the State being approved by the Interministerial Committee for Financing, Guarantees and Insurance, the sole competent body that establishes the eligibility criteria as well as the mechanism for granting financing, guarantee and insurance products provided by Exim Banca Românească in the name and on behalf of the State.

Starting with 30 September 2025, Exim Banca Românească S.A. carries out, in the name and on behalf of the State, financing, guarantee and insurance activities exclusively for supporting international transactions, in its capacity as an Export Credit Agency (ECA). In this context, the bank no longer grants new financing and guarantee commitments in the name and on behalf of the State for other categories of projects, such as infrastructure development, public utility development, regional development, research and development, environmental protection, employment and training, or support for small and medium-sized enterprises.

### 1.2 Structure of the Exim Banca Românească Group

As at 31.12.2025, the Exim Group comprises the parent company Exim Banca Românească S.A. and its subsidiary Compania de Asigurări – Reasigurări Exim România S.A.

Compania de Asigurări–Reasigurări Exim România S.A. (EximAsig) was established in 2009 as an entity specialised in the insurance of financial, export and domestic commercial risks. Authorised in August 2010 to carry out credit and guarantee insurance activities, EximAsig gradually expanded its activity and currently addresses both companies and individuals. EximAsig is controlled by Exim Banca Românească S.A., which as at 31.12.2025 held 98,57% of its share capital (31.12.2024: 98,57%).

### 1.3 Business Model

The fundamental objective of the Bank is to support the growth of prosperity in Romania by increasing the level of financial intermediation, through the sustainable and profitable development of its activity, under prudent risk and capital conditions.

Addressing both the needs of individuals and legal entities, the Bank aims to lend responsibly, encourage savings and, in general, support all its clients with appropriate advice and financial solutions.

The national territorial network of Exim Banca Românească comprises 103 territorial units (77 Retail Branches and 26 Business Centres). The geographical footprint of the territorial network is balanced, the Bank being represented in all counties. This facilitates both the financing of local business projects and funding through attracting resources from the population in a diversified manner.

The 77 Branches primarily serve the retail business line, but also the corporate business line for operations related to savings, execution of transactions with or without cash, and the use of current account packages.

The 26 Business Centres are primarily responsible for the sale of lending products to clients from the legal entities segment with turnover exceeding 5 million RON.

### **Mission**

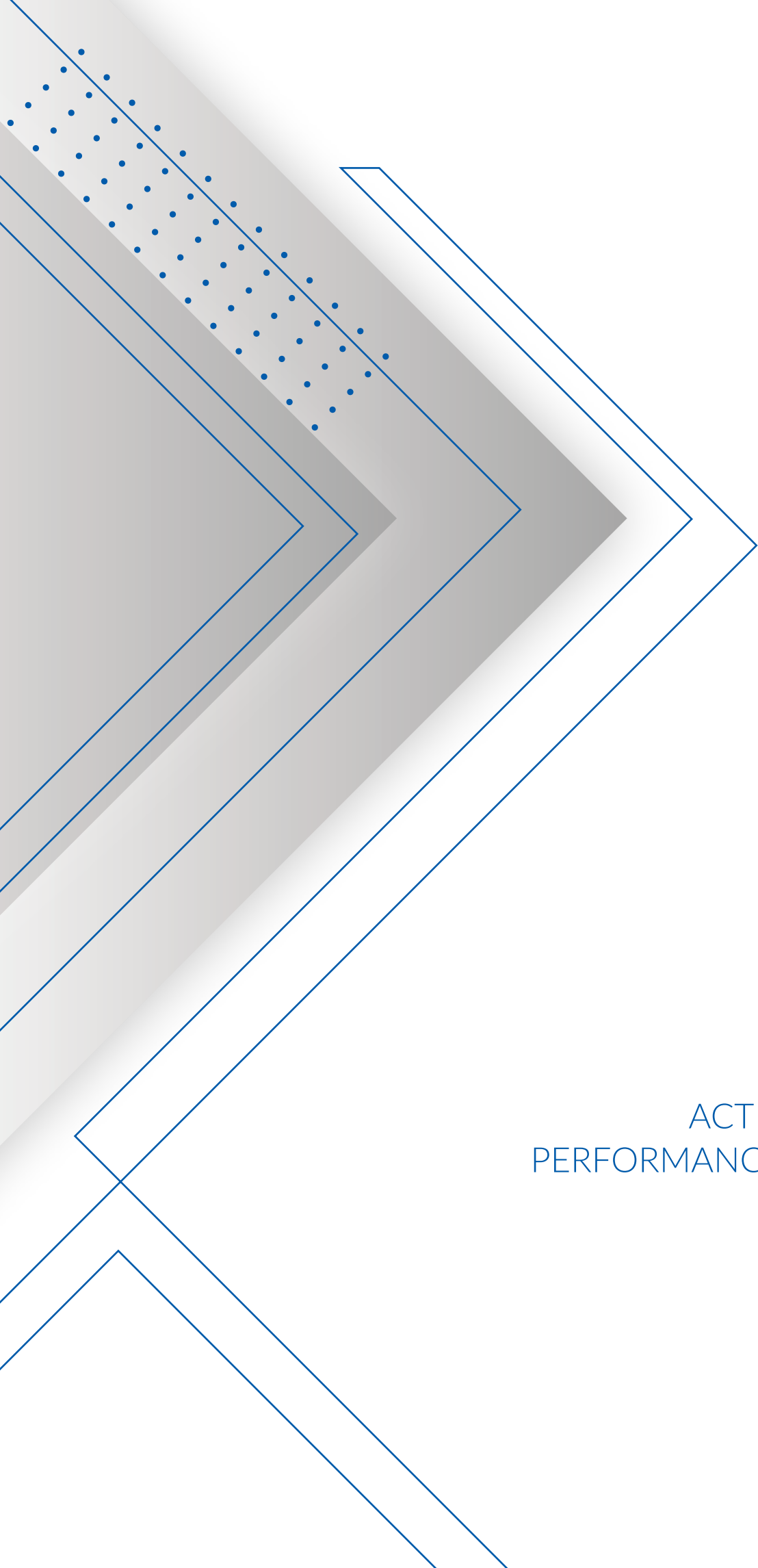
The mission of Exim Banca Românească is to support the growth of prosperity in Romania, to build sustainable partnerships for social well-being and the economic performance of its clients by accelerating financial intermediation.

### **Vision**

Exim Banca Românească has an appetite for innovation and development and, as a solid credit institution, aims to provide customised financial solutions to its clients that confirm its status as a preferred partner in banking in Romania. Exim Banca Românească fully leverages the resources and position it holds in the banking market, focuses on stimulating the business potential of its clients and contributes to the sustainable development of Romania's economy and to strengthening the Romanian banking system. Moreover, since the performance of any organisation is closely linked to the level of development of the community in which it operates and of 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 the future of Romania.

### **Values**

The organisational culture of Exim Banca Românească has gradually formed and developed through interactions among team members, with strong shaping factors that define it, such as leadership style and implicitly the decision-making process, the level of formalisation, the organisational structure, policies and know-how. Thus, a set of six values has emerged to contribute to increasing efficiency and coherence in actions, namely: Partnership and Collaboration, Team Spirit, Flexibility and Adaptability, Continuous Development, Respect and Integrity, Professionalism and Responsibility.



ACTIVITY AND  
PERFORMANCE IN 2025



## 2. ACTIVITY AND PERFORMANCE IN 2025

### 2.1 Macroeconomic context and developments in the banking sector

#### 2.1.1 Macroeconomic context

Developments in the Romanian economy in 2025 took place in an international context characterised by persistent uncertainties generated by the continuation of the conflict in Ukraine, geopolitical tensions in the Middle East, fragmentation of global trade and the slowdown of the European economy, Romania's main trading partner. External demand remained modest, while international financial conditions continued to be relatively restrictive, against the background of the high level of interest rates and risks related to the sustainability of public finances.

Against this background, Romania's economy recorded modest and volatile growth in 2025, in the context of the adjustment of domestic macroeconomic imbalances. Thus, gross domestic product increased by 0,7%, with quarterly dynamics indicating episodes of stagnation and contraction.

The structure of economic growth highlighted a pronounced orientation towards investments. Gross fixed capital formation represented the main driver of growth, supported by the implementation of infrastructure projects and the absorption of European funds, including through the National Recovery and Resilience Plan. The construction sector had a significant contribution to GDP dynamics, while agriculture provided punctual support to economic developments.

By contrast, private consumption had a modest contribution, in the context of the erosion of purchasing power and uncertainties regarding economic developments. The industrial sector remained under pressure, reflecting reduced external demand and high costs, while services recorded moderate dynamics, affected by adjustments in certain segments and fiscal consolidation measures.

Net exports continued to have a negative contribution, although diminishing compared to the previous year, against the background of still moderate external demand and more tempered import dynamics. The current account deficit remained at a high level, around 8% of GDP, highlighting persistent external vulnerabilities.

Following the disinflation process in the previous year, inflation returned to an upward trend in the second part of 2025. The annual CPI inflation rate increased significantly in the third quarter, reaching 9,88% in September, from 5,66% in June, against the background of supply-side shocks generated by the removal of electricity price caps and the increase in VAT rates and excise duties. These developments were amplified by the strong dynamics of labour costs and rising inflation expectations.

At the same time, fiscal consolidation measures contributed to the widening of the demand deficit, with disinflationary effects in the medium term, while favourable developments in food and fuel prices partially tempered the increase in inflation. The average annual inflation rate stood at approximately 7,3% according to the national methodology and 6,8% according to the harmonised index, with Romania remaining above the European Union average.

Monetary conditions remained relatively restrictive in 2025, in the context of the high level of inflation and macroeconomic risks. Money market interest rates remained at elevated levels, reflecting the prudent stance of monetary policy. The 3-month ROBOR rate recorded a significant increase in the first part of the year, from approximately 5,9% in the first quarter to a peak of over 7,1% in June, subsequently gradually decreasing to approximately 6,2% at year-end. This evolution reflects adjustments in liquidity conditions and the reaction of the money market to inflationary pressures and economic policy measures.

In 2025, the leu/euro exchange rate followed a path characterised by a moderate and controlled depreciation of the national currency. After remaining below the threshold of 5 lei/euro in the first part of the year, the exchange rate exceeded this level in the second quarter, subsequently stabilising around it until the end of the year. The relative stability of the exchange rate was supported by the prudent policy of the National Bank of Romania and fiscal consolidation measures; however, external imbalances and fiscal risks continue to represent sources of pressure on the national currency.

Overall, 2025 was characterised by modest economic growth, mainly supported by investments and construction, in the context of a limited contribution from private consumption and the industrial sector, as well as by the persistence of significant macroeconomic imbalances, including high inflation and substantial external and budget deficits.

## 2.1.2 Developments in the banking sector

In 2025, the banking sector in Romania continued to evolve within a framework characterised by financial stability, but also by increasing pressures generated by the macroeconomic, fiscal and regulatory environment. Prudential and financial indicators remained at comfortable levels, placing the banking system in the low-risk area; however, their dynamics indicate a moderation compared to the exceptional levels recorded in previous years.

The total capital ratio of the banking sector stood at 24,36% at the end of 2025, significantly above minimum capital requirements and above the European Union average, confirming a solid shock absorption capacity. Liquidity indicators remained at high levels (LCR of 257%), reflecting a robust funding position, while profitability continued to be strong (ROE of 17,6%, ROA of 1,7%), supported by interest margins and the still low cost of risk. However, during the year a trend towards normalisation of these indicators was observed, against the background of increasing funding costs and pressures on operational efficiency.

Asset quality remained adequate, although with a slight deterioration compared to the previous year. The non-performing loan ratio increased to 2,7%, mainly as a result of the increase in the volume of non-performing loans in the non-financial companies segment, while the coverage ratio with provisions remained at a comfortable level (62,6%). These developments reflect both the maturation of the lending cycle and the impact of a more volatile economic environment; however, risks remain manageable at system level.

The size of the banking system remains reduced in relation to the economy, total assets representing approximately 51% of GDP at mid-2025, the lowest level in the European Union. At the same time, the total level of financial intermediation stood at 70,7% of GDP, highlighting the existence of significant potential for increasing lending to the real sector. The subunitary loans-to-deposits ratio also confirms the existence of additional financing capacity, given the solid base of attracted resources.

Banking sector assets continued to increase, reaching approximately 957,6 billion lei in December 2025. The dynamics were supported both by the increase in exposures to the state, through holdings of government securities (+11,8%), and by lending, although at a more moderate pace (approximately 6,7% compared to the end of 2024). Households remained the main driver of lending growth (+8,1%), while corporate financing advanced more slowly (+3,5%), against the background of economic uncertainties and financing conditions.

On the liabilities side, household deposits increased by 8,1%, while deposits of non-financial corporations recorded an increase of 3,7%, reflecting pressures on corporate liquidity. At the same time, the trend towards foreign currency savings intensified, with foreign currency deposits recording higher increases than those in lei. Deposit interest rates remained elevated, with a direct effect on banks' funding costs and on net interest margins.

The fiscal and regulatory environment continued to exert pressure on the sector. The introduction and increase of the turnover tax on credit institutions, as well as the implementation of new capital and reporting requirements (CRR III / CRD VI, ESG requirements, DORA, AML), led to higher operational costs and the need to adapt business models. In this context, operational efficiency becomes a critical factor, and investments in digitalisation and automation are essential for maintaining competitiveness.

The structure of the banking market continued to consolidate in 2025, following mergers and acquisitions finalised in the recent period. The top seven banks concentrate a significant share of system assets, with the gap compared to the rest of the institutions increasing. This high concentration intensifies competitive pressure on medium-sized banks, which must differentiate their offering through specialisation, flexibility and speed of execution.

At the same time, technological transformations continue to redefine the banking business model. Accelerated digitalisation, advanced use of data and the development of personalised financial services are becoming determining factors in attracting and retaining customers. Indicators such as "time-to-yes" and "time-to-cash" are gaining strategic relevance, while the integration of artificial intelligence solutions and open banking ecosystems contributes to increasing efficiency and improving customer experience. At the same time, cybersecurity and data protection are strengthening as essential elements of trust.

Last but not least, the sustainability dimension is becoming increasingly important in banking activity. Significant exposures to sectors vulnerable to climate risks and the still limited share of green financing highlight the need to accelerate the transition towards a sustainable economy. Although green lending is recording high growth rates, it remains at a low level within portfolio structures, and the integration of ESG criteria into lending and risk management processes is becoming a strategic priority.

Overall, 2025 confirms the resilience of the Romanian banking sector, but marks the transition towards a more demanding environment, characterised by pressures on profitability, higher capital requirements, intensified competition and the need to accelerate digital and sustainable transformation. This context creates favourable premises for development, but at the same time requires a prudent and adaptive approach in defining future strategies.

## 2.2 Financial performance and key indicators in 2025

The performance of Exim Banca Românească in 2025 was marked by a significant increase in net profit, by 85% compared to the previous year, reaching RON 160,3 million at Group level, an evolution that led to improved profitability indicators, with return on equity (ROE) reaching 6,6% and return on assets (ROA) reaching 0,6%.

At the same time, the Bank strengthened its capital position, including as a result of the share capital increase carried out during 2025, maintaining comfortable levels of capital adequacy indicators, significantly above regulatory requirements. At the same time, liquidity indicators remained at solid levels, and asset quality improved, with the non-performing loan ratio decreasing to 2,95%, under prudent risk management.

Key figures on Exim Banca Românească S.A. in 2025:

### Net profit

- Group: RON 160,3 million, up by 85% compared to 2024
- Bank: RON 139,1 million, up by 90% compared to 2024

### Operating income

- Group: RON 828,1 million, up by 9%
- Bank: RON 800,0 million, up by 8%

### Operating expenses

- Group: RON 507,2 million, up by 17%
- Bank: RON 505,9 million, up by 17%
- Cost-to-income ratio: 61%, up by 4 pp compared to 2024; excluding the impact of the doubling of the turnover tax in the second half of 2025, the ratio would have been approximately 59%, respectively an increase of less than 2 pp

### Total assets

- Group: RON 29.483 million, up by 10%
- Bank: RON 29.401 million, up by 10%
- The Bank remains ranked 8th in the Romanian banking system, with a market share of 3,1%

### Gross loan portfolio

- RON 15.484 million, up by 8%, of which: loans granted to non-bank customers RON 15.381 million, up by 7%
- Corporate loans (including those granted to financial institutions): RON 12.157 million (+9%)
- Retail loans (individuals and microenterprises): RON 3.327 million (+5%)
- Market share is 4,1% on the segment of loans granted to resident legal entities and 1,6% on the segment of individuals

### Customer deposits

- RON 20.074 million, marginally below the previous year's level
- Of which: RON 14.153 million corporate and RON 5.921 million retail

## 2.3 Operational activity and main achievements

In 2025, the Bank's activity was focused on implementing the assumed strategic directions: profitable business growth, optimisation of the funding structure and streamlining of the operating model, by leveraging investments in digitalisation. In a context characterised by high competition and macroeconomic volatility, the Bank succeeded

in combining commercial growth with prudent management of risks and capital, strengthening its position in its main business segments.

The results achieved in 2025 confirm the efficiency of this model, reflected both in the above-market dynamics of the loan portfolio and in the improvement of profitability indicators. At Group level, return on equity (ROE) reached 6,6%, increasing compared to 5,1% in the previous year. At Bank level, the indicator stood at 5,8%, above the level recorded in the previous year (4,4%) and above the budgeted level, confirming the favourable trajectory of sustainable profitability growth. This evolution was supported by the expansion of commercial activity, optimisation of the funding cost and operational efficiency measures implemented during the year.

Loan balances recorded an increase of approximately 7,3%, above the market growth rate (+6,7%), a performance all the more relevant in the context of high competition and volatility of macroeconomic conditions.

Loans by business line (million lei)	2025	2024	VARIATION	VARIATION%
Corporate	12.054	11.165	+889	+8%
Retail	3.327	3.173	+153	+5%
Individuals	3.262	3.118	+145	+5%
Microenterprises	65	56	+9	+15%
<b>Loans granted to non-bank customers</b>	<b>15.381</b>	<b>14.338</b>	<b>+1.043</b>	<b>+7%</b>
Loans granted to credit institutions	103	-	+103	+100%
<b>Total loans</b>	<b>15.484</b>	<b>14.338</b>	<b>+1.146</b>	<b>+8%</b>

### Corporate business line

With regard to Corporate activity, the Bank pursued the increase of lending across all main segments, with a focus on leveraging the Bank's competitive advantage – providing customised business solutions – in order to stimulate sales in the SME and Large Corporate segments. In this respect, the Bank carried out active campaigns aimed at retaining existing customers and attracting new customers by offering competitive benefits in terms of costs and guarantees, as well as by simplifying documentation requirements for the approval of pricing conditions.

The positive evolution of the Corporate portfolio, which recorded an increase of 889 million lei (+8%) compared to the previous year, was supported both by the consolidation of relationships with existing customers and by the granting of new financing. The portfolio dynamics reflect the Bank's orientation towards financing investment projects and working capital, as well as capitalising on opportunities generated by projects of significant size (including through financing commercial real estate projects). At the same time, growth was supported by flexibility in structuring transactions and the competitiveness of offers. In an environment characterised by high competition and pressure on margins, the Bank succeeded in maintaining a growth rate above market level, strengthening its position in the Corporate segment and contributing significantly to the evolution of the total loan portfolio.

With regard to SME access to financing, the Bank signed in August 2025 a Guarantee Agreement with the European Investment Fund (EIF), through which customers may benefit from EIF portfolio guarantees for financing granted under the ceilings "SME Competitiveness" and "Sustainability". The programme recorded strong success (by the end of 2025, the Bank had already utilised 95% of the available EIF guarantee volume under the "SME Competitiveness" ceiling). At the same time, lending products backed by institutional guarantees were developed, in partnership with FNGCMM and BID, supporting the growth of loan and deposit volumes.

At the same time, the Bank capitalised on the opportunities generated by the maturation of government programmes by carrying out a dedicated refinancing campaign for loans granted under the IMM Invest programme. These actions targeted both the retention of existing customers and the attraction of new customers, contributing to strengthening commercial relationships and maintaining a high-quality portfolio. These initiatives supported the sustainable growth of the Corporate portfolio and improved capital utilisation efficiency.

At the same time, efforts were made to increase the product penetration rate per client by intensifying cross-selling activities, each targeted company benefiting from a comprehensive package of products and services, ranging from current accounts and Internet banking to working capital and investment financing. Thus, as at 31.12.2025, for SME clients, a total of 2.809 new individual customer accounts were generated under the cross-selling initiative, corresponding to 286 payroll agreements signed for this segment.

In 2025, the Bank recorded significant progress in the development of the Small Business Banking (SBB) segment through a combination of commercial, operational and capital optimisation measures. Segmentation criteria were revised through an increase in the turnover threshold, facilitating the inclusion of companies with high potential and a more efficient alignment with capital requirements. At the same time, dedicated campaigns were carried out to attract new customers and reactivate inactive ones, based on personalised offers, contributing to the expansion of the active customer base.

Commercial activity recorded a significant acceleration in the second half of the year, supported by the simplification of lending workflows and the improvement of prospecting processes, including through segmentation and prequalification of potential customers. As a result, production in the second half of 2025 increased by over 50% in value and by over 30% in number of loans compared to the first half of 2025, respectively by over 40% compared to the same period of the previous year.

Similar to the SME segment, the Bank also pursued increasing the product penetration rate per client in the SBB segment by intensifying cross-selling activities, particularly for current account packages, Internet banking services and transactional products. At the end of the year, the penetration rate of product and service packages among financed SBB customers reached 46%.

An important element supporting commercial performance was the development of the competencies of the sales teams through the completion of a specialised training programme focused on consultative sales, prospecting and negotiation, contributing to strengthening the capacity to attract and retain customers.

The Bank has expertise in syndicated loans for large clients and implemented a dedicated development strategy focused on proactively identifying opportunities, cooperation with partner banks and preparing staff to manage this type of financing. In 2025, the Bank continued to strengthen its expertise and positioning in the structured finance segment, particularly in the area of syndicated loans granted to corporate clients and financial institutions. The Bank has specialised competencies in structuring, coordinating and administering syndicated transactions, with the capacity to manage complex roles such as Coordinating Bank, Lender, Facility Agent and Security Agent.

During 2025, the Bank approved participation in three new syndicated transactions with a total value of 453 million lei. These financings represent benchmark transactions in the market, contributing to portfolio diversification and strengthening the Bank's position in the syndicated lending segment. Through its involvement in these notable and visible operations in the financial sector, the Bank increased its recognition among partner banks, institutional clients and participants in the financial industry, both in its relationships with existing clients and in attracting new partners.

The segment of non-bank financial institutions (NBFIs) offers important growth opportunities, particularly in financial leasing, consumer finance, agriculture, microfinance and mortgage intermediation. The Bank's objective is to expand the portfolio by attracting leading institutions in these areas through adapting its internal framework and dedicated products. In this respect, in 2025 the Bank expanded its NBFi segment portfolio by attracting leading institutions and adapting products to the specific needs of the industry. As a result, the Bank strengthened its portfolio of specialised bilateral financings for NBFIs by granting three new bilateral financings with a cumulative value of 73 million lei.

In order to capitalise on opportunities offered by non-reimbursable European funds, a specialised department operates within the Bank with the role of facilitating clients' access to financing and maximising the benefits generated by the NRRP, Cohesion Policy and CAP Strategic Plan 2027 programmes. The strategic focus targets all client segments through the development of integrated solutions and the provision of dedicated expertise. In 2025, the Bank invested in strengthening expertise by organising training sessions for sales and loan administration teams, ensuring continuous support in project analysis, contracting and monitoring of financings. These efforts resulted in the approval of financings exceeding 750 million lei for projects with a non-reimbursable component.

The Bank maintained a leading position in the export factoring market in Romania, consistently ranking among the top institutions by volume. In order to develop factoring activity both in the export segment and on the domestic market, the Bank recruited dedicated staff and carried out training programmes for the entire corporate sales force, providing stronger support to commercial teams.

### Retail business line

In the Retail segment, in 2025, the Bank carried out a series of major initiatives focused on attracting and reactivating customers, diversifying the product offering, expanding alternative sales channels and streamlining commercial and operational processes.

These initiatives were reflected in remarkable results in the mortgage loan segment, where the volume of disbursements was 5,4 times higher compared to the previous year, marking the highest level in the last three years. At the same time, early repayments remained at a low rate due to the retention strategy implemented, which allowed the mortgage loan portfolio to exceed the budgeted level by 6% at the end of 2025.

In the consumer loan segment, activity dynamics remained positive, with the portfolio recording an 11% increase at the end of 2025 compared to the previous year. This evolution was supported by maintaining a solid sales pace and strengthening the customer base, in the context of adapting the pricing policy to the individual risk profile and market conditions.

These results were supported by a series of commercial campaigns with significant impact, such as Back to School, Gift Season, refinancing through credit cards and Casa A+, which stimulated customer interest, generated increases in attracted volumes and strengthened the visibility of the Bank's offering in target segments. Each of these initiatives was designed to address specific customer needs, contributing directly to the dynamization of commercial activity and to the achievement of established objectives.

Starting with August 2025, a pricing policy for unsecured consumer loans based on the individual risk profile of customers was implemented. The implementation of this model contributed to improving the portfolio mix by attracting customers with an appropriate risk profile, while supporting the objectives of profitable growth and cost-of-risk control.

The Bank aims to expand cooperation with external partners in order to increase the volume of retail loan sales by leveraging the resources and expertise of intermediaries. In 2025, 25 new partnerships were signed with credit intermediaries, reaching a total of 40 active collaborations at the end of 2025 for the promotion and sale of housing loans. At the same time, the Bank initiated the development of alternative distribution channels by launching the approval process for cooperation with lead generators (real estate agencies, developers). At the same time, an analysis was launched to adapt the product offering to the requirements of these channels, in particular the mortgage loan product intended for financing housing construction.

The Bank continued to develop its commercial approach based on customer knowledge and personalised offers, placing emphasis on leveraging the existing customer base. During 2025, dedicated campaigns were carried out to attract new funds, targeting individual customers who previously held deposits or significant balances but no longer maintain such placements. These initiatives aimed to strengthen customer relationships and increase attracted resources through offers adapted to their financial profile and behaviour.

In the liabilities products segment, the Bank continued initiatives aimed at optimising the portfolio, focusing on simplifying the offering and increasing the base of active customers.

In this regard, a process for simplifying the portfolio of current account packages and term deposit offerings was implemented, with the objective of reducing operational complexity, increasing transparency and consolidating products around clear and competitive value propositions. The number of account packages was reduced by 56%, contributing both to the optimisation of internal costs and to more efficient commercial positioning.

At the same time, the Bank removed from its standard offering deposit maturities with low demand, simplifying the structure of savings products and supporting the streamlining of internal administration and reporting processes.

At the same time, commercial campaigns dedicated to attracting new customers and increasing resources in current accounts were carried out, such as "Member get Member", "Welcome" and "Zero package costs. Guaranteed. For life!". These initiatives leveraged digital channels and customer base segmentation, contributing to the increase in the number of active customers, intensifying the use of services and strengthening recurring revenues.

The results achieved, together with innovation and the quality of services provided to customers, were recognised through the award of the “Excellence in Retail Banking Award” at the Excellence Awards Gala 2025.

The adjustment of commercial incentive mechanisms contributed to aligning the objectives of the distribution network with the Bank’s strategic directions, supporting the implementation of commercial initiatives and improving performance in the retail segment.

In the microenterprise segment, the Bank continued to strengthen its commercial model by transitioning to an approach based on centralised and targeted campaigns aimed at increasing the base of active customers and originating new financing. The process is supported by centralised sales management mechanisms and by streamlining analysis and approval workflows through the use of customer profiling and financial prequalification tools.

In 2025, the Bank made important progress in developing the Micro segment, including by adjusting the organisational framework and expanding segmentation criteria through increasing the classification threshold from RON 2 million to RON 5 million turnover. This measure enabled access to an expanded customer segment under conditions of continuous optimisation of dedicated processes and workflows. At the same time, dedicated tools supporting commercial activity and training programmes for the sales force were implemented, contributing to improving the efficiency of promotion and sales processes.

In addition, analyses were initiated for the development of the lending product range, while for the transactional area the opportunity to define a competitive offering dedicated to microenterprises was assessed. The Bank was awarded the “Banking Product of the Year for Lending” prize – Financing Campaign Without Granting Fee for Small Entrepreneurs – at the Piața Financiară Awards Gala, recognition that confirms the competitiveness and relevance of the financing solutions offered to the Micro segment.

To promote financial inclusion and facilitate rapid access of microenterprises to capital, the Bank diversified the portfolio of lending products:

- Launch of the „Overdraft Micro” product → allows microenterprises to benefit from additional liquidity management instruments, facilitating business continuity and reducing vulnerability to short-term shocks. At the same time, the product contributes to increasing the level of financial intermediation and diversifying solutions tailored to the life cycle of very small companies.
- Implementation of the strategic partnership with the European Investment Fund (EIF) → This partnership provides access to dedicated European guarantees, allowing more advantageous financing conditions for entrepreneurs (reduced costs, lower collateral requirements). In order to support access to financing, the Bank approved and is currently implementing two additional strategic partnerships with the Development Bank of Romania (BID) and FNGCIMM, which will facilitate portfolio guarantees and guarantee ceilings. These initiatives create the premises for expanding the Micro customer portfolio and support their development through access to more diversified products and flexible financing solutions.
- Development of the funding base through competitive transactional packages: the Bank capitalised on the upward trend in the number of newly established companies and SMEs’ need for simple, fast and predictable banking solutions by launching in 2025 two highly competitive transactional packages:
  - The “Start-up” package (12 months free of charge) → Addressed to companies established within the last 24 months, this package contributes to accelerating banking penetration and supporting the early stages of business development. The 12-month free-of-charge period represents an important competitive advantage, strengthening relationships with new entrepreneurs and encouraging the use of digital services.
  - The SBB0 transactional package (45 RON) → This package offers an attractive pricing structure for micro-companies and small and very small companies, reducing recurring operational costs. By simplifying access to essential banking services, the Bank stimulates customer loyalty and portfolio diversification in the medium term.

With regard to attracted funding sources, in 2025 the Bank launched deposit offers for attracting new funds, with attractive interest rates for new individual customers, developed competitive transactional packages for the Micro segment and expanded the card product offering, including through the launch of the Mastercard Debit Premium card in EURO and the improvement of credit card functionalities, including by adding a refinancing component within a dedicated campaign. These initiatives supported the process of attracting and retaining retail customers, stimulating turnover in current accounts.

At the same time, the Bank initiated a project for the implementation of EFTPOS and VPOS solutions, in collaboration with specialised partners, in order to expand payment acceptance services for corporate customers, both through POS terminals and e-commerce solutions.

At the same time, the Bank continued the modernisation of its cash infrastructure by replacing 15 ATM terminals with state-of-the-art multifunctional equipment equipped with cash recirculation functionality, contributing to the optimisation of operational costs. The ATM network was also expanded in areas with high economic potential, facilitating access to banking services and supporting the attraction of new customers. At the same time, the deposit capacity at multifunctional terminals was increased from 40 to 160 banknotes in order to better respond to customer needs, especially corporate customers.

In terms of digitalisation, the Bank continued to improve customer experience by implementing solutions aimed at simplifying interaction and reducing processing times. In this context, the online form for the management of garnishments was introduced and the project for the digitalisation of transaction authentication was launched through the integration of biometric authentication into the mobile application.

At the same time, the Bank pursued optimisation of the funding structure by gradually adjusting high-cost deposits and increasing the share of resources originating from granular clientele, both corporate and retail, thus contributing to improving funding cost efficiency and strengthening a more stable and diversified funding base.

In terms of ESG risks, the Bank completed the adaptation of the internal risk management framework and implemented the requirements of the EBA Guidelines, including through the development of KRI/KPI systems and customer assessment tools from the perspective of ESG risks. These measures enable the assessment of the impact of climate and environmental risks on the Bank's risk profile, portfolio quality and solvency in the short, medium and long term. At the same time, from the perspective of developing the corporate as well as retail product portfolio, the Bank developed a Sustainable Financing Framework which includes specific classification criteria for these products across different categories and which forms the basis for the development of green products.

## Treasury

During the financial year ended, Treasury activity continued to play an essential role in ensuring the financial stability and liquidity required to support the Bank's operations. Liquidity management was carried out through mechanisms that enabled the optimisation of placements and the efficient use of liquidity surplus, under conditions of safety and profitability.

In this context, the Bank increased its securities portfolio by 62% during the year, across all instrument categories (trading securities, securities measured at fair value through other comprehensive income and securities at amortised cost), in order to ensure efficient liquidity management and to capitalise on opportunities generated by interest rate developments.

At the same time, an active approach was maintained on financial markets, focused on maximising revenues and efficiently managing market risks, particularly foreign exchange risk and interest rate risk. This approach led to a 52% increase in gains from foreign exchange transactions and securities trading in 2025.

The performance of the Treasury business line was reflected both in the financial results achieved and in the maintenance of solid liquidity indicators, with the liquidity coverage ratio (LCR) reaching 221% at the end of 2025, a level significantly above regulatory requirements.

## Group insurance activity

With regard to the Group's insurance activity, according to available data, for the first nine months of 2025, EximAsig is one of the leaders of the guarantee insurance market, ranking 3rd among insurance companies based on the volume of gross written premiums related to guarantee insurance, with a market share of 17,28%, increasing compared to 2024. This evolution reflects the strengthening of EximAsig's position in this specific segment.

## Process optimisation and digitalisation

In 2025, the Bank continued the process of simplifying and streamlining the operational model, with the objective of increasing the value generated for customers, employees and shareholders.

In this context, Exim Banca Românească implemented an extensive portfolio of IT, automation and digitalisation projects, with a direct impact on increasing efficiency, reducing operational costs and improving the experience of customers and internal users. These initiatives strengthened the Bank's capacity to support business objectives, improved operational control and increased flexibility in responding to market requirements and regulatory framework developments.

A major milestone of this process was the completion, in December 2025, of the Core Banking system consolidation project, which ensured a unified and scalable technological foundation, increased operational resilience and reduced the complexity of the application architecture. The project enabled the acceleration of time-to-market for new products and services, optimisation of the structure of products and current packages, as well as simplification of customer onboarding and administration processes, with direct effects on operational efficiency and service quality.

At the same time, the Bank initiated the implementation of significant automation projects for business and operational workflows, targeting the end-to-end digitalisation of critical processes, reduction of processing times, increased data accuracy and mitigation of operational risks. These initiatives generate concrete business benefits through more efficient resource utilisation, increased processing capacity and improved internal control and traceability of operations.

In 2025, developments dedicated to support systems for commercial and relationship activities were implemented, including the extension and modernisation of CRM platform functionalities, with a direct impact on customer relationship management, increased service personalisation and improved cross-selling capacity and portfolio monitoring. At the same time, specific developments related to the SANB project were implemented, contributing to improving the Bank's compliance with regulatory requirements.

At the same time, the Bank carried out additional technical developments and initiatives in 2025, including the extension of digital channel functionalities for customers, modernisation of system integration architecture, as well as strengthening cybersecurity and operational continuity measures. Overall, these projects supported the increase of organisational performance, improved customer experience and strengthened the Bank's position in the context of digital transformation in the banking sector.

With regard to the distribution network, the Bank implemented a retail branch network optimisation project based on performance and market potential criteria. In this context, 5 units were closed, under conditions of implementing portfolio transfer plans and customer communication measures.

At the same time, a pilot project for cashless operations was initiated, this activity to be supported through a 24/7 banking area. The initiative aims to adapt the operating model to new trends in the use of banking services, characterised by orientation towards digital and automated channels, reduced dependence on cash and increased service availability. At the same time, the project contributes to optimising operational costs and improving customer experience by reducing waiting times and increasing flexibility in accessing banking services.

At the same time, in order to improve operational efficiency and leverage synergies between retail and corporate activities, the Bank continued the process of consolidating Retail and Corporate units in shared locations, implemented, by the end of 2025, in four additional such centres. The initiative contributes to cost optimisation, increased efficiency in resource utilisation and providing an integrated approach to customer relationships. The consolidation process will continue in the following period, including in 2026.

In the retail segment, initiatives were launched to transform lending processes and workflows (individuals and Micro), in the context of automating analysis-approval processes and revising the related documentation.

In the product area, card visuals were changed, these being issued from recyclable materials, in line with the Bank's sustainability commitment. At the same time, projects such as the issuance of digital cards were initiated, with an implementation deadline in 2026.

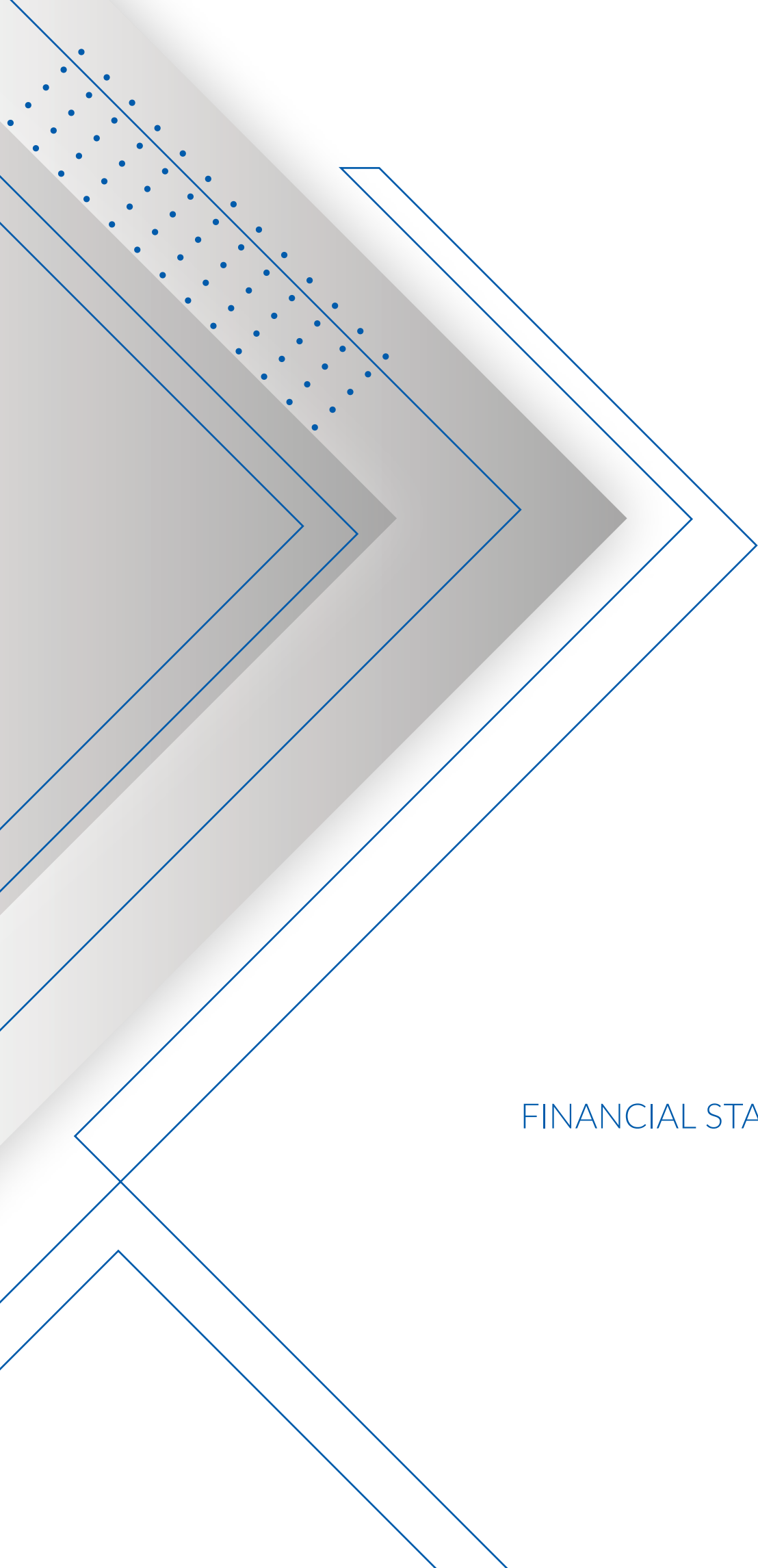
For the Micro segment, an important step consists of implementing customer prequalification and profiling processes based on extended sets of financial and non-financial data. In this context, the Bank implemented automated tools supporting commercial activity. These initiatives contribute to increasing operational efficiency, improving the customer selection process and standardising commercial workflows.

In the Corporate segment, significant improvements were introduced to streamline the corporate lending workflow. Thus, the new internal rating model (risk class) for Corporate and SME customers was implemented, simplified review workflows for exposures below 10 million RON were introduced and the matrix for determining approval competences for corporate exposures was simplified by revising the variables underlying approval competence determination.

Overall, the initiatives implemented during 2025 reflect a deep transformation process of Exim Banca Românească's operational model, oriented towards digitalisation, automation and simplification of interaction with customers and internal users. The year 2025 marked an important stage in this process through the completion of critical systems modernisation projects, consolidation of the Core Banking platform, extension of support system functionalities for commercial activity and implementation of significant initiatives for automation of operational workflows.

Investments made in IT infrastructure, architecture modernisation and securing digital channels created solid premises for increasing internal efficiency, reducing processing times, decreasing dependence on manual operations and improving the quality of services provided to customers. The digitalisation and automation of internal processes, together with system development, contributed to optimising workflows, increasing operational control, improving reporting capacity and supporting commercial activities through more efficient use of data.

These actions create the basis for continuing development in the coming period, including through the extension of digital functionalities dedicated to customers, deepening end-to-end process automation and leveraging data in support of management decisions and commercial performance growth, in line with strategic objectives and regulatory requirements.



# FINANCIAL STATEMENTS

### 3. FINANCIAL STATEMENTS

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 in accordance with NBR Order no. 27/2010, issued by the National Bank of Romania, as subsequently amended and supplemented. The financial statements are prepared on a going concern basis and reflect, in all material respects, the financial position, financial performance and cash flows of the Bank and of the Group. In preparing them, the general accounting principles were observed, including prudence, consistency of methods, accrual basis, non-adjustment of the opening balance sheet, non-offsetting and substance over form. At the same time, the provisions of Accounting Law no. 82/1991, republished, as subsequently amended and supplemented, as well as the accounting and prudential regulations applicable to credit institutions were complied with. The separate and consolidated financial statements were audited by Deloitte Audit S.R.L., which issued an unmodified audit opinion, confirming that they present fairly the financial position and performance of the Bank.

#### 3.1 Statement of financial position

Exim Banca Românească ended 2025 with total assets amounting to 29.483 mil. RON, increasing by 10% compared to the end of 2024. The evolution of the main balance sheet items is presented as follows:

Financial position (mil. RON)	2025		2024		VARIATION %	
	Group	Bank	Group	Bank	Group	Bank
Cash and balances with NBR	5.563	5.563	5.557	5.557	+0%	+0%
Deposits with credit institutions	1.318	1.298	2.479	2.465	-47%	-47%
Loans to credit institutions	103	103	0	0		
Loans to non-bank customers	14.905	14.905	13.852	13.852	+8%	+8%
Securities	7.034	6.975	4.372	4.314	+61%	+62%
Investments in subsidiaries	0	61	0	61		
Property and equipment, intangible assets and investment property	355	350	327	321	+9%	+9%
Other assets	205	146	196	170	+5%	-14%
<b>Total Assets</b>	<b>29.483</b>	<b>29.401</b>	<b>26.782</b>	<b>26.740</b>	<b>+10%</b>	<b>+10%</b>
Deposits from credit institutions	3.397	3.397	1.252	1.252	+171%	+171%
Deposits from the State	2.194	2.194	2.800	2.800	-22%	-22%
Deposits from customers	20.074	20.183	20.075	20.151	-0%	+0%
Other liabilities	668	514	930	828	-28%	-38%
Equity	3.151	3.114	1.725	1.709	+83%	+82%
<b>Liabilities and equity</b>	<b>29.483</b>	<b>29.401</b>	<b>26.782</b>	<b>26.740</b>	<b>+10%</b>	<b>+10%</b>

#### Loans

- The gross loan balance recorded an increase of 8% compared to the level at the end of 2024;
- By business lines, the corporate segment (including credit institutions) increased by 9% compared to the previous year, while the retail segment (individuals and microenterprises) recorded an increase of 5%, mainly supported by the dynamics of unsecured consumer loans, increasing by 16% compared to the previous year;
- The non-performing exposure ratio (EBA AQT\_3.2) stood at 2,95% at the end of 2025, decreasing from 3,34% recorded in the previous year, an evolution reflecting the maintenance of solid portfolio quality in the context of increased lending activity.

#### Customer resources

- The balance of attracted deposits remained at a level comparable to the previous year, the variation in absolute terms being insignificant (-2 mil. RON);

- By segments, corporate deposits decreased by 3% compared to the previous year, while retail deposits increased by 7%;
- The share of retail deposits in total increased to 29% (compared to 27% in the previous year), reflecting the strengthening of the funding base from more stable sources.

#### **Securities**

- The securities portfolio recorded in 2025 an increase of approximately 61%, reaching 7,0 bn RON, supported by capitalising on opportunities generated by the level of interest rates;
- The structure of the portfolio is dominated by debt securities measured at fair value through other comprehensive income (FVOCI) and securities at amortised cost, contributing to balancing liquidity and yield objectives;
- The increase in the portfolio reflects active liquidity management in a context characterised by interest rate volatility.

#### **Cash, balances with the NBR and with credit institutions**

- Cash and balances with the NBR and with credit institutions amounted to 6.983 mil. RON at Group level, decreasing by 13% compared to 2024, in the context of optimising liquidity placements;
- The Bank's immediate liquidity indicator reached 52% at the end of 2025, increasing compared to the previous year and significantly exceeding the limit established by the significant risk management strategy.

#### **Property and equipment, intangible assets and investment property**

- The value of property and equipment, intangible assets and investment property increased by 9% compared to the previous year, reaching 355 mil. RON, mainly driven by investments made and the dynamics of right-of-use assets;
- A significant share of the total is represented by right-of-use assets, which as at 31 December 2025 amounted to 169 mil. RON at consolidated level.

#### **Placements of the Romanian State**

- Attracted in accordance with Law 96/2000 for the purpose of ensuring the financial resources necessary for carrying out operations in the name and on behalf of the State;
- They consist of long-term deposits amounting to 1.400 mil. RON, deposits with a maturity of 3 months amounting to 625 mil. RON and demand deposits amounting to 151 mil. RON (to which 18 mil. RON attached liabilities are added).

#### **Equity**

As at 31.12.2025, consolidated equity totals 3.151 mil. RON, its evolution being mainly influenced by the share capital increase carried out during 2025, amounting to 1.250 mil. RON. Thus, share capital reached 2.765 mil. RON, of which the statutory value registered with the Trade Register of 2.023 mil. RON, corresponding to a number of 337.088.056 shares with a nominal value of 6 RON/share, the difference representing inflation adjustment in accordance with IAS 29. Equity is supplemented by retained earnings (-326 mil. RON), statutory reserves (665 mil. RON), other reserves (45 mil. RON), non-controlling interests (1 mil. RON).

### **3.2 Profit and loss account**

The consolidated net result of Exim Banca Românească as at 31 December 2025 amounted to 160,3 mil. RON, of which the Bank's profit was 139,1 mil. RON, significantly higher compared to the previous year (+85% at Group level). The evolution of financial results reflects the favourable dynamics of operating income and the reduction in the cost of risk, despite the increase in operating expenses.

The dynamics of the Bank's and consolidated financial results are presented as follows (mil. RON):

Profit and loss account (mil. RON)	2025		2024		VARIATION %	
	Group	Bank	Group	Bank	Group	Bank
<b>Operating income</b>	<b>828,1</b>	<b>800,0</b>	<b>757,0</b>	<b>739,9</b>	<b>+9%</b>	<b>+8%</b>
Net interest income	507,1	499,7	509,5	504,3	-0%	-1%
Net fee and commission income	124,0	124,0	119,3	119,2	+4%	+4%
Net income from trading and from financial assets at fair value through other comprehensive income	158,0	158,0	104,1	104,2	+52%	+52%
Net insurance income	13,9	0,0	11,7	0,0	+18%	
Other income	25,2	18,3	12,2	12,2	+105%	+50%
<b>Operating expenses</b>	<b>-507,2</b>	<b>-505,9</b>	<b>-434,0</b>	<b>-434,0</b>	<b>+17%</b>	<b>+17%</b>
<b>Operating result</b>	<b>320,9</b>	<b>294,1</b>	<b>322,9</b>	<b>305,9</b>	<b>-1%</b>	<b>-4%</b>
Cost of risk	-114,4	-112,9	-212,2	-211,8	-46%	-47%
<b>Gross profit</b>	<b>206,4</b>	<b>181,2</b>	<b>110,8</b>	<b>94,1</b>	<b>+86%</b>	<b>+93%</b>
Current and deferred income tax	-46,1	-42,1	-24,3	-21,0	+90%	+100%
<b>Net profit</b>	<b>160,3</b>	<b>139,1</b>	<b>86,4</b>	<b>73,1</b>	<b>+85%</b>	<b>+90%</b>

### Operating income

- Totalled 828,1 mil. RON, increasing by 9% compared to the previous year, supported by the increase in business volumes and the dynamics of trading income;
- Net interest income amounted to 507,1 mil. RON, at a level similar to that of the previous year, the evolution reflecting the Bank's capacity to offset the decrease in average interest rates, determined by the reduction in reference rates, through the increase in volumes and average balances of interest-bearing assets;
- Net fee and commission income increased by 4%, reaching 124,0 mil. RON, mainly driven by the increase in income from card operations and from the administration of activities carried out in the name and on behalf of the State;
- Net income from trading and from financial assets at fair value through other comprehensive income recorded a significant increase of 52%, reaching 158,0 mil. RON, mainly due to gains from foreign exchange swap transactions;
- Net insurance income reached 13,9 mil. RON at Group level, increasing by 18%;
- Other income increased by 105%, reaching 25,2 mil. RON.

### Operating expenses

- Operating expenses totalled 507,2 mil. RON, increasing by 17% compared to the previous year, driven, on the one hand, by the expansion of activity, under conditions of maintaining adequate cost control, and, on the other hand, by the influence of exogenous factors, mainly fiscal in nature, in the context of cost increases in the second half of the year (including the increase in VAT and the doubling of the turnover tax);
- Staff expenses and related expenses increased by 13%, reflecting both salary adjustments and the strengthening of operational capacity in the context of business development;
- Depreciation and amortisation expenses increased by 13%, as a result of investments made in IT infrastructure and in network modernisation;
- Other operating expenses increased by 24% (respectively +14% excluding the impact of the doubling of the turnover tax), driven by the increase in business volumes, inflationary pressures and higher costs of external services;
- The evolution of operating expenses reflects both the macroeconomic and fiscal context and the Bank's efforts to support business development and operational transformation processes.

### Cost of risk

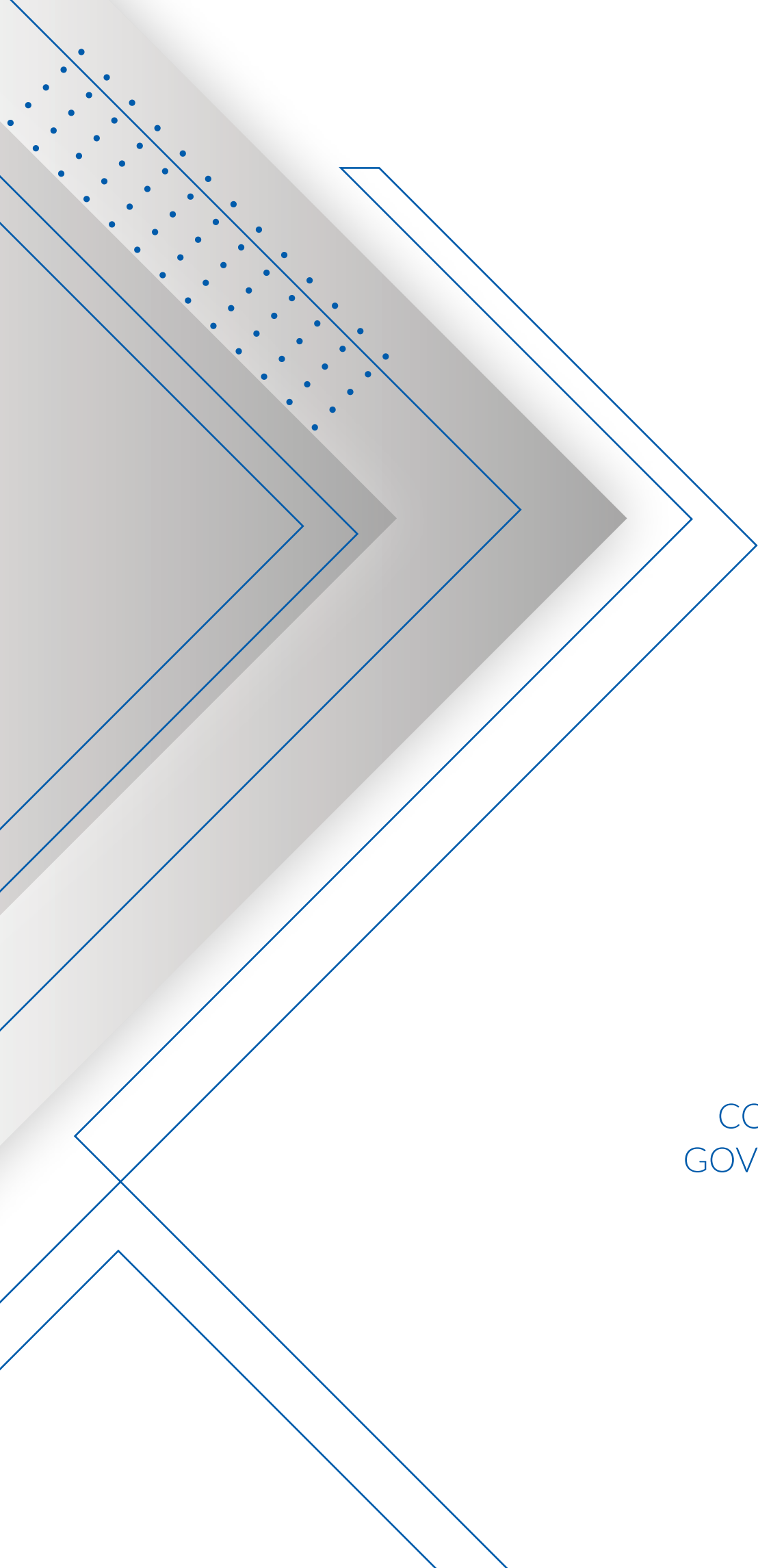
- Net impairment expense for financial assets and guarantees granted amounted to 114,4 mil. RON (including recoveries from loans written off the balance sheet), decreasing by 46% compared to the previous year;
- The favourable evolution is mainly driven by the high level of recoveries from loans written off the balance sheet (141,5 mil. RON), while the Bank maintained a prudent approach in managing credit risk.

### 3.3 Prudential indicators

The main prudential indicators reflect the strengthening of the financial position of the Group/Bank in 2025, both from the perspective of capitalisation and profitability, as well as asset quality:

- Capital adequacy indicators remain at comfortable levels, significantly above regulatory requirements, increasing compared to the previous year, including as a result of the share capital increase, with the total own funds ratio reaching 24,8% and the leverage ratio 9,0%;
- Liquidity indicators remain solid, with LCR and NSFR levels well above the minimum regulatory thresholds, despite a slight adjustment in LCR, while immediate liquidity improved to 52%;
- Profitability recorded a positive evolution, both ROA and ROE increasing compared to the previous year, in the context of the improvement in net result;
- Asset quality strengthened, with the non-performing loan ratio decreasing to 2,95%, under conditions of maintaining a prudent approach to credit risk management.

Summary indicators	2025		2024	
	Group	Bank	Group	Bank
<b>PROFITABILITY</b>				
Return on assets	0,6%	0,5%	0,3%	0,3%
Return on equity	6,6%	5,8%	5,1%	4,4%
Operating expenses: Operating income	61%	63%	57%	59%
<b>CAPITAL ADEQUACY</b>				
Total own funds ratio, Tier 1 (T1), Common Equity		24,8%		24,2%
Leverage ratio – transitional definition		9,0%		5,9%
<b>LIQUIDITY</b>				
Immediate liquidity		52%		49%
Liquidity Coverage Ratio (LCR)		221%		248%
Net Stable Funding Ratio (NSFR)		171%		159%
Gross loans: Deposits		76%		71%
<b>ASSET QUALITY</b>				
Non-performing loan ratio (EBA AQT_3.2)		2,95%		3,34%



CORPORATE  
GOVERNANCE

## 4. CORPORATE GOVERNANCE

### 4.1 Shareholding structure, subsidiaries and participations

As at 31.12.2025, the shareholding structure of Exim Banca Românească is as follows:

- The Romanian State through the Ministry of Finance, with a shareholding of 99,56% of the share capital;
- Individual and legal entity shareholders, other than the Romanian State, with a shareholding of 0,44% of the share capital.

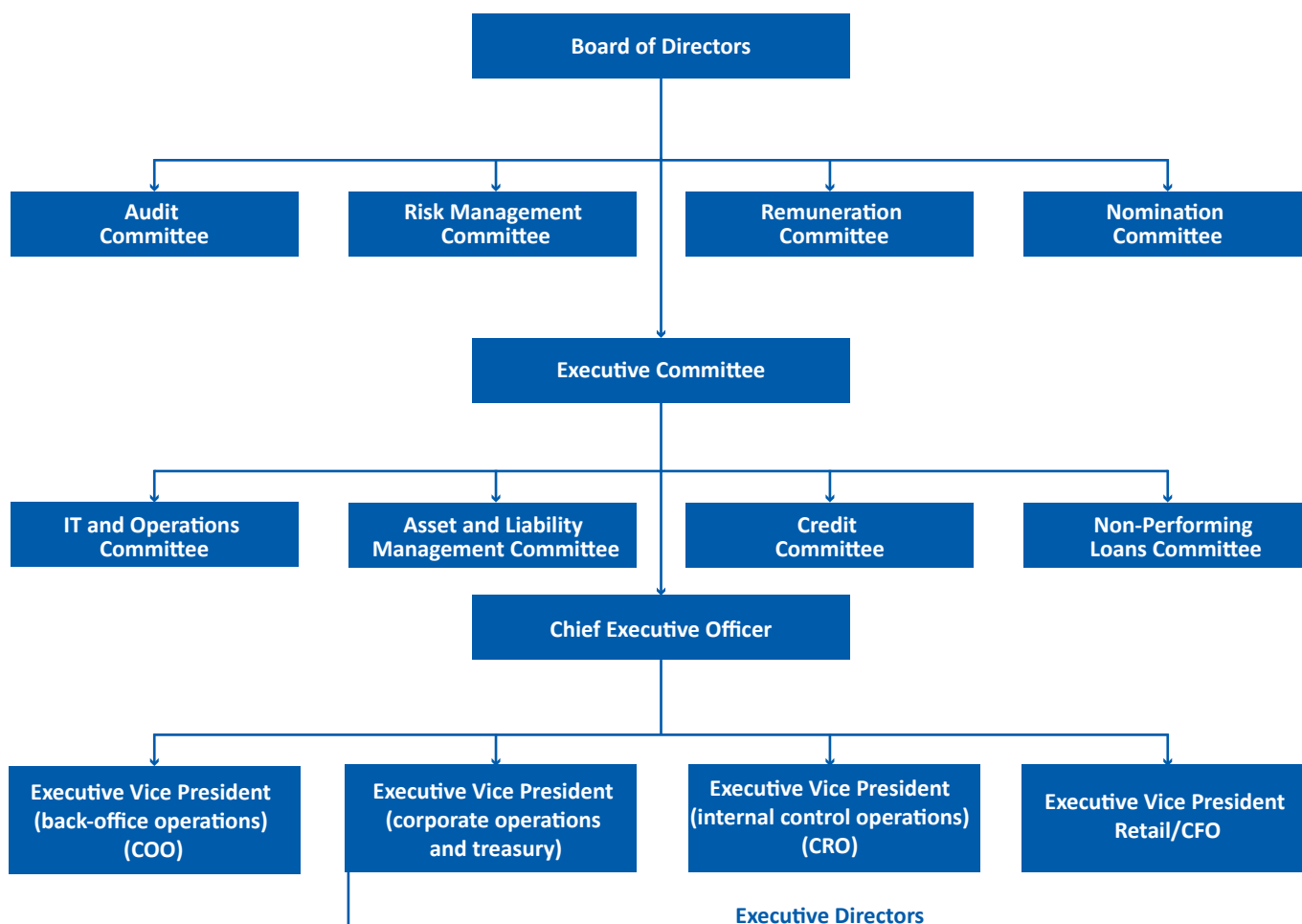
All shareholders of Exim Banca Românească are treated equitably and exercise their right to be equally and simultaneously informed and to monitor the Bank's activity, having access, based on the principle of decision-making transparency, to information available on the Bank's website, where they may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

In preparing these reports and financial statements, the Bank complies with high standards of transparency, responsibility and integrity, being subject to accounting, disclosure, compliance and audit standards in accordance with international practices in the field. In order to ensure active, accurate and efficient communication with all shareholders, while observing the general rule of equal and simultaneous disclosure of information, the Bank provides on its website the section "Information for shareholders", thus communicating in real time information regarding General Meetings of Shareholders, adopted resolutions, specifying the related communication channels, with a dedicated correspondence address, suport.actiunari@eximbank.ro.

#### Subsidiaries

Within the financial consolidation perimeter, Exim Banca Românească includes Compania de Asigurări - Reasigurări Exim România, a Romanian legal entity authorised by the Financial Supervisory Authority, a company operating in the non-life insurance sector, in which Exim Banca Românească holds a participation of 98,57%.

### 4.2 Management structures at the level of Exim Banca Românească



## General Meeting of Shareholders

The General Meeting of Shareholders is the authority ensuring the strategic management of the Bank, being responsible for establishing the strategic organisational objectives and allocating the resources necessary for their achievement, including with regard to sustainability initiatives in accordance with 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 administrators; establishes their responsibilities and revokes them. The executive administrators are represented by the Executive President and 3 Executive Vice-Presidents of the Bank. Appoints the Chairman of the Board of Directors from among the non-executive members;
- b. determines the remuneration of the executive and non-executive members of the Board of Directors;
- c. reviews, approves or amends the annual financial statements, based on the reports submitted 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 the business plan;
- g. decides on the pledging, leasing or closure of one or more units of the company;
- h. takes note of the semi-annual report of the Board of Directors prepared in accordance with the provisions of art. 55 para. (1) of Emergency Ordinance no. 109/2011 on the corporate governance of public enterprises, as subsequently amended and supplemented.

### ***The Extraordinary General Meeting of Shareholders has the following responsibilities:***

- a. decides on amendments to the Articles of Incorporation and on the change of the Bank's name;
- b. decides on the change of the Bank's registered office;
- c. decides on the change of the object of activity;
- d. decides on the increase of the share capital;
- e. decides on the reduction of the share capital or its replenishment through the issuance of new shares;
- f. decides on the issuance of bonds;
- g. decides on participation with capital in financial and banking companies, in compliance with the provisions of the law;
- h. decides on the dissolution and liquidation of the Bank;
- i. decides on the acquisition, disposal, leasing, exchange or creation of guarantees over assets belonging to the Bank's patrimony, whose value exceeds half of the accounting value of the Bank's assets at the date of concluding the legal act;
- j. approves the merger with other companies or the division of the company;
- k. decides on any other matters falling within its competence according to the law, regarding the Bank's activity.

## Board of Directors

Exim Banca Românească, a Romanian legal entity organised as a joint-stock company and operating in accordance with Companies Law no. 31/1990, republished, as subsequently amended and supplemented, Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy, approved by Law no. 227/2007, as subsequently amended and supplemented, the secondary banking regulations issued by the National Bank of Romania, the provisions of directly applicable European regulations, as well as in accordance with the Law on the organisation and functioning of Exim Banca Românească S.A. no. 96/2000, republished, as subsequently amended and supplemented, and the Articles of Incorporation of Exim Banca Românească S.A., is a significant credit institution in the category of other systemically important institutions (O-SII).

Exim Banca Românească S.A. is a company managed under a unitary system, being governed by a Board of Directors appointed by the General Meeting of Shareholders, composed of 9 members, of whom 5 non-executive directors and 4 executive directors, namely the Executive President of the Bank and 3 Executive Vice-Presidents, in accordance with the provisions of the Law on the organisation and functioning of Exim Banca Românească S.A. no. 96/2000, republished, as subsequently amended and supplemented, Government Decision no. 924/2023 regarding the selection procedure and remuneration of the Executive President, Executive Vice-Presidents and non-executive members of the Board of Directors of Exim Banca Românească S.A., and the Bank's Articles of Incorporation. The Chairman 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 mandate renewal. Among the non-executive members of the Board of Directors, a sufficient number of members (minimum 3) are independent, in accordance with the applicable legal and regulatory provisions.

The prerogatives related to the exercise of directors' responsibilities are subject to prior approval by the National Bank of Romania, the management responsibilities being exercised from the date this condition is fulfilled.

The duties of the members of the Board of Directors are in accordance with the mandate received from shareholders, having as their ultimate responsibility the performance of the Bank. Through the Regulation on Organisation and Functioning, responsibilities are defined such as establishing, approving and supervising the implementation of the general business strategy and key policies of the credit institution, taking into account the applicable legal and regulatory framework, the financial interests and long-term solvency of the credit institution, with objectives centred on the concepts of sustainability and durability.

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

At the same time, the Board of Directors approves the business model of Exim Banca Românească, pursuing the creation of a sustainable model focused both on the continuous development of the organisation and on supporting its customers' projects, through the constant monitoring of risk management systems.

### ***Composition of the Board of Directors during 2025***

#### ***- For the period 01.01.2025 – 28.01.2025:***

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

#### ***- For the period 29.01.2025 – 05.02.2025:***

1. Andrei Răzvan MICU – Non-executive member, Chairman of the Board of Directors
2. Traian Sorin HALALAI – Executive member of the Board of Directors, Executive President
3. Lidia STAN – Executive member of the Board of Directors, Executive Vice-President
4. Codin Radu NĂSTASE – Executive member of the Board of Directors, Executive Vice-President
5. Nina PUIU – Independent non-executive member
6. Cristi Marcel SPULBĂR – Independent non-executive member

#### ***- For the period 06.02.2025 – 11.02.2025:***

1. Andrei Răzvan MICU – Non-executive member, Chairman of the Board of Directors
2. Traian Sorin HALALAI – Executive member of the Board of Directors, Executive President
3. Lidia STAN – Executive member of the Board of Directors, Executive Vice-President
4. Codin Radu NĂSTASE – Executive member of the Board of Directors, Executive Vice-President
5. Nina PUIU – Independent non-executive member
6. Cristi Marcel SPULBĂR – Independent non-executive member
7. Liviu George MAHA – Independent non-executive member
8. Dragoș Grațian POPA – Independent non-executive member

#### ***- For the period 12.02.2025 – 31.12.2025:***

1. Andrei Răzvan MICU – Non-executive member, Chairman of the Board of Directors
2. Traian Sorin HALALAI – Executive member of the Board of Directors, Executive President
3. Lidia STAN – Executive member of the Board of Directors, Executive Vice-President
4. Codin Radu NĂSTASE – Executive member of the Board of Directors, Executive Vice-President
5. Cătălin Vasile PĂRVU – Executive member of the Board of Directors, Executive Vice-President
6. Nina PUIU – Independent non-executive member
7. Cristi Marcel SPULBĂR – Independent non-executive member
8. Liviu George MAHA – Independent non-executive member
9. Dragoș Grațian POPA – Independent non-executive member

During 2025, the Board of Directors met 30 times, each director fulfilling the commitment regarding the minimum expected time of effective participation required for the proper exercise of the prerogative of the position of Board member in the meetings of the Board of Directors.

#### **Committees supporting the Board of Directors**

##### **➤ Audit Committee**

**The composition of the Audit Committee during 2025 was as follows:**

**- For the period 01.01.2025 – 13.02.2025:**

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

**- For the period 14.02.2025 – 31.12.2025:**

1. Nina PUIU – Chairperson, independent non-executive director
2. Liviu George MAHA – Member, independent non-executive director
3. Cristi-Marcel SPULBĂR – Member, independent non-executive director

During 2025, the Audit Committee met 14 times, each member, non-executive director, fulfilling the commitment regarding the minimum expected time of effective participation required for the proper exercise of the prerogatives of the position of member in the meetings of the committees supporting the management body in its supervisory function, namely 100% of the total meetings.

##### **➤ Risk Management Committee**

**The composition of the Risk Management Committee during 2025 was as follows:**

**- For the period 01.01.2025 – 13.02.2025:**

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

**- For the period 14.02.2025 – 31.12.2025:**

1. Dragoș Grațian POPA – Chairperson, independent non-executive director
2. Cristi-Marcel SPULBĂR – Member, independent non-executive director
3. Andrei-Răzvan MICU – Member, non-executive director

During 2025, the Risk Management Committee met 16 times, each member, non-executive director, fulfilling the commitment regarding the minimum expected time of effective participation required for the proper exercise of the prerogatives in the meetings of the committees supporting the management body in its supervisory function, namely 100% of the total meetings.

##### **➤ Remuneration Committee**

**The composition of the Remuneration Committee during 2025 was as follows:**

**- For the period 01.01.2025 – 13.02.2025:**

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

**- For the period 14.02.2025 – 31.12.2025:**

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

During 2025, the Remuneration Committee met 7 times, each member, non-executive director, fulfilling the commitment regarding the minimum expected time of effective participation required for the proper exercise of the prerogatives in the meetings of the committees supporting the management body in its supervisory function, namely 100% of the total meetings.

## ➤ **Nomination Committee**

**The composition of the Nomination Committee during 2025 was as follows:**

**- For the period 01.01.2025 – 13.02.2025:**

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

**- For the period 14.02.2025 – 31.12.2025:**

1. Liviu George MAHA – Chairperson, independent non-executive director
2. Andrei-Răzvan MICU – Member, non-executive director
3. Dragoș Grațian POPA – Member, independent non-executive director

During 2025, the Nomination Committee met 4 times, each member, non-executive director, fulfilling the commitment regarding the minimum expected time of effective participation required for the proper exercise of the prerogatives in the meetings of the committees supporting the management body in its supervisory function, namely 100% of the total meetings.

## **Executive Committee**

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

In accordance with the provisions of the Articles of Incorporation of Exim Banca Românească, the Executive Committee is composed of the Executive President and up to 4 Executive Vice-Presidents. The prerogatives of the Bank's senior management are subject to prior approval by the National Bank of Romania, with responsibilities being exercised starting from the date this condition is fulfilled.

The Executive Committee is responsible for implementing the strategies and policies applicable to the Bank and maintaining a rigorously designed activity management framework, in compliance with legislation and banking regulations.

**The composition of the Executive Committee during 2025 was as follows:**

**- For the period 01.01.2025 – 28.01.2025:**

1. Traian Sorin HALALAI – Chairman of the Executive Committee, Executive President, temporary coordinator of the internal control activity and back-office activities
2. Cristian Florin ȘAITARIU – Member of the Executive Committee, Executive Vice-President, coordinator of the corporate and treasury activity and temporarily of the retail activity

**- For the period 29.01.2025 – 11.02.2025:**

1. Traian Sorin HALALAI – Chairman of the Executive Committee, Executive President
2. Lidia STAN – Member of the Executive Committee, Executive Vice-President, coordinator of the retail activity / CFO
3. Codin Radu NĂSTASE - Member of the Executive Committee, Executive Vice-President, coordinator of the internal control activity (CRO)

**- For the period 12.02.2025 – 27.03.2025:**

1. Traian Sorin HALALAI – Chairman of the Executive Committee, Executive President
2. Lidia STAN – Member of the Executive Committee, Executive Vice-President, coordinator of the retail activity / CFO
3. Codin Radu NĂSTASE - Member of the Executive Committee, Executive Vice-President, coordinator of the internal control activity (CRO)
4. Cătălin Vasile PÂRVU – Member of the Executive Committee, Executive Vice-President, coordinator of the corporate and treasury activity

**- For the period 28.03.2025 – 31.12.2025:**

1. Traian Sorin HALALAI – Chairman of the Executive Committee, Executive President
2. Lidia STAN – Member of the Executive Committee, Executive Vice-President, coordinator of the retail activity / CFO
3. Codin Radu NĂSTASE - Member of the Executive Committee, Executive Vice-President, coordinator of the internal control activity (CRO)

4. Cătălin Vasile PĂRVU - Member of the Executive Committee, Executive Vice-President, coordinator of the corporate and treasury activity

5. Eugen BUNEA – Member of the Executive Committee, Executive Vice-President, coordinator of the back-office activity (COO)

During 2025, the Executive Committee met 60 times, each member fulfilling the commitment regarding the minimum expected time of effective participation required for the proper exercise of the prerogatives of the position of member in the meetings of the Executive Committee.

#### **Specialized committees of the Executive Committee:**

##### ➤ **Credit Committee (CCr)**

The Credit Committee assesses the conditions for granting loans and issuing guarantees in relation to the risks associated with operations carried out in the Bank's own name and on its own account for corporate clients.

##### ➤ **Asset and Liability Management Committee (ALCO)**

In accordance with its competences, the Asset and Liability Management Committee (ALCO) has the role of managing and deciding on the Bank's assets and liabilities in order to maintain competitiveness and profitability, as well as to manage the related risks, based on materials prepared by the specialized internal structures and on trends in the macroeconomic environment and financial markets, also taking into account legislative developments impacting the Bank's activity.

In this regard, ALCO's activity mainly focuses on the prudent management of the Bank's resources and placements, ensuring liquidity, managing the foreign exchange position, interest rates related to asset and liability items, transfer pricing, interest rate risk, foreign exchange risk, liquidity risk and funding risk.

ALCO carries out its activity in accordance with the Bank's strategies and policies in the field and ensures, through its activity, the maximization of the profitability of assets and other elements by efficiently managing the Bank's resources. At the same time, ALCO has specific responsibilities regarding the Recovery Plan, acting both as a Monitoring Committee and as a Recovery Committee (extended ALCO).

##### ➤ **IT and Operations Committee (CITO)**

The IT and Operations Committee mainly coordinates the portfolio of projects included in the annual Master Plan, evaluates the required resources, prioritizes and balances projects with IT&C impact, reviews the implementation of IT&C projects, the development and integration of IT solutions into the Bank's business development processes, approves procedures, instructions and the operational framework regarding the conduct of the Bank's activity and endorses regulations for which the law or the Articles of Incorporation provide approval by the Board of Directors or the Executive Committee.

##### ➤ **Non-Performing Loans Committee (CCN)**

The Non-Performing Loans Committee ensures an adequate recovery process at the level of the portfolio of problematic assets. Thus, the Non-Performing Loans Committee analyses the portfolio of problematic assets and proposals related to problematic assets, assesses, endorses or approves, within its competence, proposals for measures regarding the recovery of the Bank's receivables from non-performing loans and/or other non-performing commitments associated with operations carried out by Exim Banca Românească in its own name and on its own account. At the same time, the CCN closely monitors the restructuring and recovery process of problematic loans for the managed clients.

## **4.3 Governance Policies**

### **4.3.1 Policy on the activity management framework at the level of Exim Banca Românească**

Exim Banca Românească has in place a formally established activity management framework, rigorously designed, which includes a clear organizational structure with well-defined, transparent and consistent lines of responsibility, effective processes for identifying, managing, monitoring and reporting the 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 consistent with sound and effective risk management.

The processes and mechanisms related to the activities carried out are comprehensive and adapted 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 the applicable laws, regulations and procedures.

The control mechanisms are ensured through 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 the level of Exim Banca Românească includes verification by the independent control functions of compliance with internal control policies and procedures. Exim Banca Românească has implemented three functions independent from the business lines and the units they control, which have sufficient authority, status and resources, namely:

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

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

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

Specifically, the Chairman of the Risk Management Committee, in the context of responsibilities related to risk oversight, supervises the implementation of the ESG strategy at bank level, as well as the alignment of risk management policies with sustainability standards.

The verification of the alignment of internal regulations with ESG standards falls within the responsibilities of the Audit Committee, which evaluates the operating model, business and strategic planning, data and processes, public disclosures in accordance with regulatory requirements, and essential elements of a sustainable financing framework.

The Nomination Committee monitors the implementation of ESG standards in accordance with the regulatory framework and relevant best practices, promoting diversity and inclusion policies, ensuring ESG-related training programmes and the integration of sustainability objectives into performance evaluations.

The Remuneration Committee evaluates the alignment of the remuneration policy with the environmental, social and governance objectives of the Bank and ensures compliance with the relevant principles and standards.

The Remuneration Committee ensures that the general principles and policies regarding staff remuneration and benefits are aligned with the business strategy, the objectives included in the sustainability strategy, the values and long-term interests of the Bank, as well as with other responsibilities, as specified in the Regulation on Organization and Functioning.

#### **4.3.2 Process for assessing the suitability of members of the management body**

Members of the Bank's management body, namely the members of the Board of Directors and of the Executive Committee, must possess the training, knowledge and competencies necessary for the performance of their duties, in accordance with the provisions of Law no. 31/1990, Government Emergency Ordinance no. 99/2006, Government Emergency Ordinance no. 109/2011, Law no. 96/2000, the provisions of the Bank's Articles of Incorporation and of the mandate agreements, as well as with the applicable regulations.

Members of the management body must understand the role they hold within the corporate governance framework and must act objectively, critically and independently in the exercise of their supervisory and management responsibilities, both within the management body and within the specialized committees.

The assessment of the suitability of the members of the Board of Directors and of the Executive Committee is carried out in accordance with the provisions of Article 108 paragraph (1) of Government Emergency Ordinance no. 99/2006 and of National Bank of Romania Regulation no. 5/2013 on prudential requirements for credit institutions, as subsequently amended and supplemented, based on the documentation related to the candidacy and the criteria regarding reputation, knowledge, competencies, skills and experience, appropriate to the nature, size and complexity of the Bank's activity.

**The Nomination Committee** has the role of contributing to the initial and ongoing suitability assessment, both at individual and collective level, of the Board of Directors and of the Executive Committee. It periodically evaluates, but at least once a year, the structure, composition and performance of the management body and formulates recommendations to the Board of Directors regarding any changes that may have occurred.

Based on the results of the assessment, the members of the management body are subject to prior approval by the National Bank of Romania, in accordance with the applicable regulations. Following their appointment and completion of the stages provided for by Regulation no. 12/2020 on the authorization of credit institutions and changes in their situation, the suitability assessment is carried out on an ongoing basis and, formally, at least annually, including by reference to the objectives established through the mandate agreements.

At Bank level, adequate succession planning is implemented, particularly for members of senior management, in order to ensure continuity of activity and maintain an appropriate level of expertise, as part of the collective suitability of the management body.

**The policy on the appointment, succession planning of key function holders and the assessment of their suitability** ensures the necessary framework for assessing the suitability of key function holders prior to appointment, as well as for their subsequent reassessment, in relation to the defined requirements. The policy establishes the requirements regarding the identification of suitable candidates, the framework for the development of their competencies in relation to the Bank's business strategy and strategic objectives, as well as the criteria underlying the assessment and reassessment of suitability and succession planning.

Exim Banca Românească ensures, on an ongoing basis, that key function holders possess adequate knowledge, competencies, skills and experience, as well as good reputation, honesty and integrity, necessary for the exercise of the responsibilities related to the positions held.

**The policy on the induction and training of members of the management body** contributes to the continuous development of the knowledge, competencies and skills necessary for members of the management body in order to fulfil their management responsibilities. In this regard, the Bank ensures, through the annual professional training programmes, the allocation of the resources necessary for individual and collective training, with the purpose of maintaining and developing relevant competencies, in line with the requirements of the position and the Bank's strategic objectives.

#### 4.3.3 Diversity and human rights

Exim Banca Românească promotes an inclusive working environment based on respect for diversity and human rights, applicable to all employees, including members of the management bodies.

**The policy on promoting diversity management** aims to leverage individual differences and create a framework in which each employee can achieve their potential at a high level of performance, contributing to the generation of added value for the Bank.

The diversity approach takes into account differences among employees, including those related to education, professional experience, gender, age, origin, ethnicity, sexual orientation, beliefs or disabilities, as well as individual characteristics such as skills, competencies and working style. The Bank ensures equal opportunities and fair treatment in all human resources processes, including recruitment, promotion and remuneration.

Respect for human rights, the promotion of diversity and ensuring equal opportunities represent fundamental principles governing the Bank's relationships with its employees, clients and partners.

**The remuneration policy** is designed to support the Bank's business and risk strategy, organizational culture and long-term objectives, contributing to attracting and retaining a high-performing and ethical workforce. It is gender-neutral, does not encourage excessive risk-taking and includes measures to prevent conflicts of interest. The policy is approved and monitored by the management body.

At Bank level, the Remuneration Committee operates with an advisory role for the management body in its supervisory function, being responsible for assessing the alignment of the remuneration policy with the business strategy, sustainability objectives, organizational culture and the Bank's long-term interests.

**The human resources policy**, an integral part of the Bank's overall strategy, establishes the organizational framework, responsibilities and processes related to human resources management, in order to support sustainable development and strengthen a performance-oriented organizational culture. It ensures the alignment of human resources practices with business and sustainability objectives, as well as the integration of individual and team performance indicators into the Bank's strategic objectives.

## 4.4 Compliance, ethics and business responsibility

### Anti-corruption policy and strategy

Exim Banca Românească, signatory of the declaration regarding the assumption of the organizational integrity agenda in the context of the National Anti-Corruption Strategy 2021-2025, conducts its activity within a transparent and consistent internal control environment that ensures the identification, assessment, monitoring and mitigation of the risks to which it is exposed in the course of its activity, in order to achieve its 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, in order to implement anti-corruption measures ensuring 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 ethical and professional standards, promoting a culture of avoiding conflicts of interest, knowing and observing 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 complies with the principles of equal treatment, non-discrimination, proportionality and mutual recognition, etc.

Periodic staff training represents an essential instrument for preventing corruption acts by increasing staff awareness regarding what constitutes acceptable ethical and professional standards, the risks and impact that corruption acts may have on the reputation and assets of Exim Banca Românească, as well as the sanctions applicable in such cases. Thus, in 2025 all members of the management body and all Group staff were informed and trained regarding the strategy and policies in this area.

In 2025, at Bank level:

- There were no corruption incidents involving employees;
- There were no corruption incidents leading to the conclusion or termination of collaboration relationships with business partners/suppliers;
- There were no legal actions brought against the Bank or its employees having as object corruption acts.

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

At the same time, in accordance with the Bank's anti-corruption strategy, the management of Exim Banca Românească must be informed in due time regarding any potential or actual corruption acts occurring at organizational level and which may be or are generated and identified as a result of: conflicts of interest; internal fraud; non-compliance with the provisions of the Code of Ethics for staff; the Whistleblower channel; customer complaints.

<sup>1</sup> The Statement on the assumption of the organizational integrity agenda in the context of the National Anti-Corruption Strategy 2021-2025 is published on the website of Exim Banca Românească

## Compliance with competition law

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

Compliance with competition rules represents a key priority across the entire activity, in order to maintain a healthy competitive environment, and staff are instructed not to engage in understandings, agreements or practices that could have the effect of restricting or distorting competition and not to abuse their position in the banking market by engaging in anti-competitive practices that could prejudice the interests of competing banks. Information about competitors and their products may only be obtained from independent sources and never from a representative of the competitor.

## Compliance with legislative regulations

The manner in which Exim Banca Românească conducts its activity is aimed at strict compliance with the applicable national and international legislative regulations.

Compliance with the legislation specific to the financial-banking sector, the adoption of best practices and the implementation of high standards represent a priority for the Bank, these being transposed into internal regulations and communicated to employees for proper application.

The National Bank of Romania, within its supervisory actions, verifies the manner of application, implementation and transposition into the internal regulatory framework 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, as appropriate, may apply fines, penalties and sanctions.

## Conflicts of interest

The Bank promotes a culture of avoiding conflicts of interest so that 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 personal, financial or other interests in the performance of their duties and do not use the prerogatives of their position to obtain undue benefits for themselves, their families or related 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 within the Bank*, which establishes the manner of managing conflicts of interest within the Bank through the identification, assessment, management and mitigation or prevention of potential and actual conflicts of interest both at institutional level and with regard to the individual interests of employees, including members of the management body, which could negatively influence the performance of their duties and responsibilities.

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

During 2025, no situations generating actual conflicts of interest were identified within Exim Banca Românească.

At the same time, through the whistleblowing channel, the Bank has implemented internal and external reporting procedures made available to all staff, as well as to other persons who, in a professional context, have obtained information regarding possible breaches of legislation or internal regulations. These procedures allow the reporting, under confidentiality conditions, of legitimate concerns related to the conduct of activities, including current or potential breaches, providing an alternative to the usual hierarchical reporting channels. At the same time, the implemented framework ensures the protection of personal data both for the persons making reports and for those concerned by the reports, in accordance with applicable legal requirements. All reports received through the whistleblowing channel are analysed, investigated, communicated to the Bank's management and, where appropriate, appropriate measures are adopted.

## Information security

In the context of the continuous development of the financial-banking sector and the digital transformations in this field, information security and the protection of personal data represent priorities. Exim Banca Românească has implemented and maintains an adequate security system for protecting information from the perspective of confidentiality, availability and integrity.

### ***Roles and responsibilities***

Clear roles and responsibilities are defined for the implementation of information security. The governance role in the field of information security is assigned to the Information Security Department (DSI), 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 regarding the identification, assessment and reporting of security risks. At the same time, DSI ensures the drafting, updating and maintenance of internal regulations (policies, procedures, instructions, etc.) describing the processes for ensuring the implementation of information security and develops continuous training and awareness programmes for users (employees and clients) regarding security risks. The administrative role in the field of information security (implementation, parameterization, administration of security solutions/applications) lies with the Infrastructure Development Division, thus 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 applicable guidelines and practices in the field. Solutions are implemented for vulnerability scanning of the network and IT systems and platforms for collecting, storing and analysing security events and abnormal network behaviours extracted from application, system and network equipment logs. Real-time visibility of security information and events is thus ensured, and through a central console that correlates events and data flows, security alerts are generated that allow accelerated analysis and handling of security incidents.

### ***Handling of security incidents***

Details such as the type of attack, target, timing, resource value, vulnerability status and the history of security events all contribute to the rapid detection, prevention and investigation of possible security incidents. In order to ensure early detection and prevention of security incidents, security bulletins received, within cooperation frameworks, from the National Directorate for Cyber Security (DNSC), SWIFT, EUROPOL and CyberINT (through the Romanian Banking Association – ARB), or from other public sources are also analysed. No major security incidents were detected or reported in 2025.

### ***Protection of personal data***

Through internal regulations regarding the management of security incidents, Exim Banca Românească has established, in accordance with applicable legal requirements, reporting mechanisms (to the competent supervisory authority and, where appropriate, to clients) for security incidents involving personal data. When such incidents are likely to generate a risk to the rights and freedoms of affected natural persons, they must be reported to the supervisory authority. If, in addition, the risk is high, the incidents must also be reported to the respective natural persons.

In 2025, no reportable security incidents involving personal data were identified.

Since the security of client data represents a sine qua non condition for long-term success in the financial-banking sector, ensuring data security is a priority for the Bank. In this regard, the following measures were implemented and maintained at Bank level during 2025:

- a Data Protection Officer (DPO) is appointed within the Bank, reporting to the highest level of management of Exim Banca Românească, in accordance with applicable legislation, and ensuring the information and advice of the Bank and its employees regarding their obligations related to data protection;
- the rules governing the handling of requests submitted by data subjects concerning one or more of the rights provided for by data protection legislation are regulated internally, with the related roles and responsibilities defined;
- the DPO function is integrated into specific workflows, such as those regarding the management of security incidents, the management of data subject requests, outsourcing activities involving personal data processing, the implementation of new technologies, etc., in accordance with the Policy on the processing of personal data at the level of Exim Banca Românească and the internal regulations subsequent thereto;
- mandatory annual training programmes in the field of data protection are organized for all employees, followed by verification of the knowledge acquired;

- at the same time, employees of Exim Banca Românească benefit from continuous training through materials in the field of data processing made available by the Bank;
- an annual training programme in the field of data protection is ensured for the members of the Board of Directors of Exim Banca Românească.

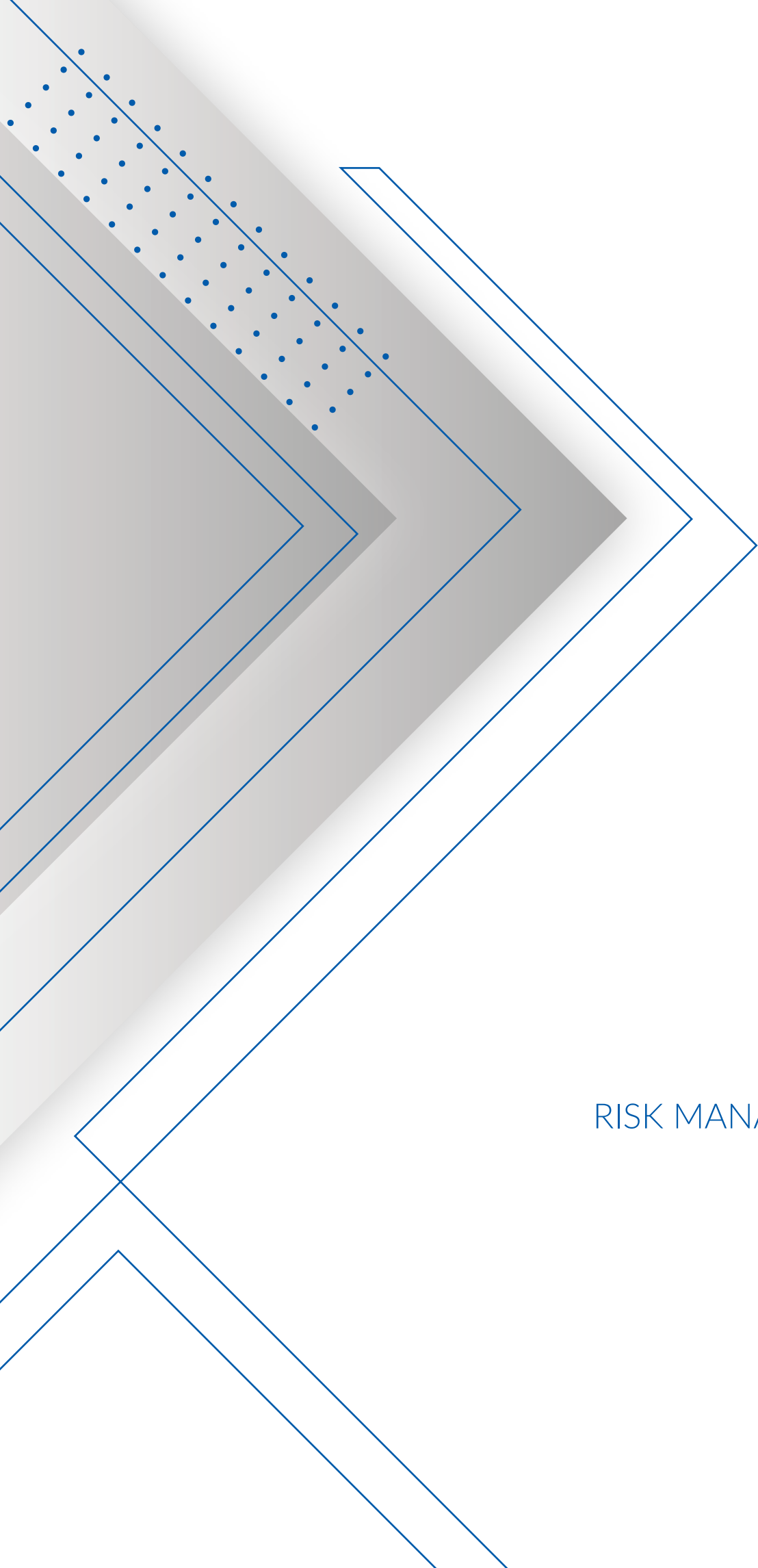
#### **4.5 Transparency in the relationship with stakeholders**

At the level of Exim Banca Românească, the following categories of stakeholders have been identified: shareholders, employees (represented individually and by the trade union), clients (represented individually or through various associations), the business community (represented through different associations), the communities in which the Bank carries out its activity and their members (individuals or organizations), suppliers, central and local public institutions, and business partners.

The Bank continuously engages in dialogue with all the above-mentioned categories, together with whom it can contribute to improving the business climate and to the sustainable development of communities. Thus, the Bank is a promoter of constant dialogue between the private sector, decision-makers and social partners.

With regard to institutionalized dialogue, the Bank's involvement materializes in various actions: public statements and communications, participation in the public consultation process with authorities through professional associations, business associations or employers' organizations, participation in debates organized by media partners or professional organizations and civil society organizations.

These actions aim to identify the problems faced by the business environment, as well as solutions that can bring benefits to all parties involved and, implicitly, to the community as a whole. These approaches are based on the mechanisms and principles of corporate governance, ethical conduct and professional relationships grounded in transparency and integrity.



## 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, which could affect the achievement of its objectives, and take measures regarding any changes in the conditions under which the Bank carries out its activity.

Within the Bank, risk management activities are carried out mainly at the following levels:

- the responsibilities of the Board of Directors (BoD) and of the Risk Management Committee, as an advisory body supporting the BoD in the approval and periodic review of the Bank's risk appetite and risk capacity, as well as its risk profile and risk tolerance, established for the categories of significant risks assumed by the Bank;
- the responsibility of the Executive Committee (ExCo) to ensure the implementation of the strategy and policies regarding the management of significant risks approved by the BoD and to develop procedures and methodologies for identifying, measuring, monitoring and controlling risks, so that the Bank has effective risk management processes, in line with the nature and complexity of relevant activities;
- within the decision-making process, the risk management function ensures that risk-related aspects are properly taken into account; however, responsibility for the decisions taken remains with the operational units, support functions and, ultimately, the Bank's management body;
- the management of the Bank's exposure to foreign exchange risk, interest rate risk, liquidity risk, etc., by Asset and Liability Management;
- the operational management of risks at the level at which they are generated;
- the independent review function performed by the Internal Audit Division.

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

*The Strategy on the management of significant risks* establishes the level of risk appetite that Exim Banca Românească considers acceptable and is willing to assume, the risk tolerance and the risk profile for the categories of significant risks assumed by the Bank, with the objective of optimizing the risk–return ratio, as well as aligning the assumed risk appetite with the capital requirements calculated by the Bank under conditions of sound and prudent activity.

The Bank uses relevant risk indicators, with limit thresholds specific to each risk category, which are periodically and continuously monitored and adapted to the evolution of activity and the economic environment.

The Bank periodically performs a self-assessment process of risks and related controls. Where a high level of risk results after the application of controls, risk mitigation actions become mandatory.

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

The risk management framework covers all relevant risks, taking into account 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 applies the standardised approach for credit risk, market risk and operational risk.

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

Exim Banca Românească aims to ensure that its own funds adequately cover the capital requirements for risks under Pillar I – credit risk, market risk and operational risk – to which the capital requirement for significant risks not included under Pillar I is added (for example, concentration risk, interest rate risk, etc.).

The calculation of the capital requirement necessary to cover risks not included under Pillar I is determined in accordance with internal procedures.

With regard to ILAAP, Exim Banca Românească aims to maintain adequate levels of liquidity buffers and liquidity indicators by assessing the risks assumed, in accordance 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 initiated at the level of national authorities and regulatory and supervisory authorities with an impact on the financial-banking sector. Considering the fundamental objective of the banking system in financing the economy, in the context of climate change and sustainable development, the banking system also has the additional role of redirecting financial flows and thus supporting the transition to a sustainable economy. Therefore, at Bank level, the management of climate change risks has become a permanent concern. Climate risks influence certain risks already managed by the Bank, such as credit risk, market risk, liquidity risk, etc.

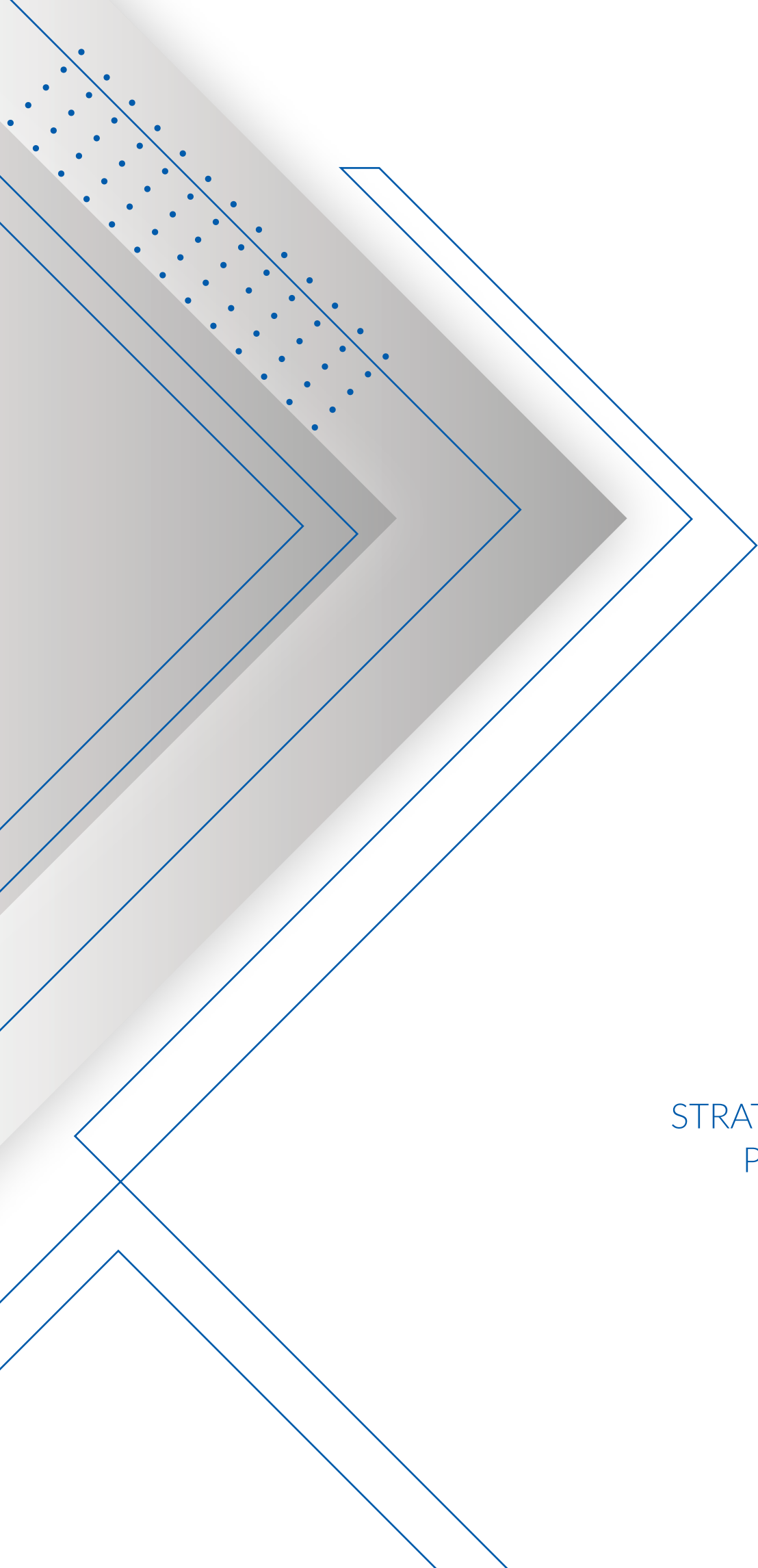
**Physical risk** refers to the financial impact caused by a changing climate, including frequent extreme weather events and gradual climate changes, as well as environmental degradation such as air, water and land pollution, water stress, biodiversity loss and deforestation. Physical risk is classified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

**Transition risk** refers to the financial loss of an institution that may result, directly or indirectly, from the process of adjustment towards a sustainable, lower-carbon and greener economy. This could be triggered, for example, by the relatively abrupt adoption of climate and environmental policies, technological progress or changes in market sentiment and preferences.

At Bank level, in the context of managing risks associated with climate change, the following aspects are taken into consideration:

- encouraging projects and activities with a favourable impact on the environment or society in general, including by taking into account, in the process of analysing financing requests, the borrower’s exposure to environmental, social and governance factors (hereinafter referred to as ESG factors);
- identifying and classifying borrowers exposed to high risks associated with ESG factors and carrying out more in-depth analyses of the business models of such borrowers, including through the identification and analysis of mitigation measures for these risks.

Within the process of evaluating real estate collateral, the valuation reports prepared for the Bank include information related to ESG factors based on inspections and documents made available in the valuation report, such as: the 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 related to the assessed assets, as well as the manner of their identification (based on inspection, based on documents, etc.). Thus, the final estimated market value for real estate collateral takes these factors into account to the extent that they are recognized by the market.



STRATEGY AND  
PRIORITIES



## 6. STRATEGY AND PRIORITIES

The Bank's strategic objective is the profitable development of its activity, under prudent risk and capital conditions, through increasing business volumes, improving operational efficiency and strengthening its position within the banking system.

The strategy for the period 2026–2029 is structured along two main directions: business development and optimization of the operating model.

On the business development component, the Bank aims to expand its client base and increase lending volumes, both in the corporate and retail segments, with a focus on products that generate recurring income and ensure efficient capital utilization. The strategic direction targets strengthening customer relationships by positioning the Bank as a primary financial partner and by developing integrated offerings that include both financing and transactional services.

In the corporate segment, the strategy aims to increase financing volumes, including through participation in complex transactions and investment projects, the development of trade finance and factoring products, as well as leveraging opportunities in sectors with growth potential, such as energy and infrastructure. At the same time, the Bank aims to expand its SME and microenterprise client base through standardised products, simplified processes and the use of European and national guarantees in order to support access to financing.

In the retail segment, the strategy aims to increase the loan portfolio and the base of active clients, as well as to develop transactional relationships through products and services tailored to client needs. At the same time, the Bank aims to strengthen attracted resources by increasing the share of current accounts and stable funding sources, with a direct impact on optimizing the cost of funding.

Optimizing the balance sheet structure represents an important strategic direction, with the Bank aiming to increase the share of income-generating assets and improve the funding mix in order to support the net interest margin and medium-term profitability.

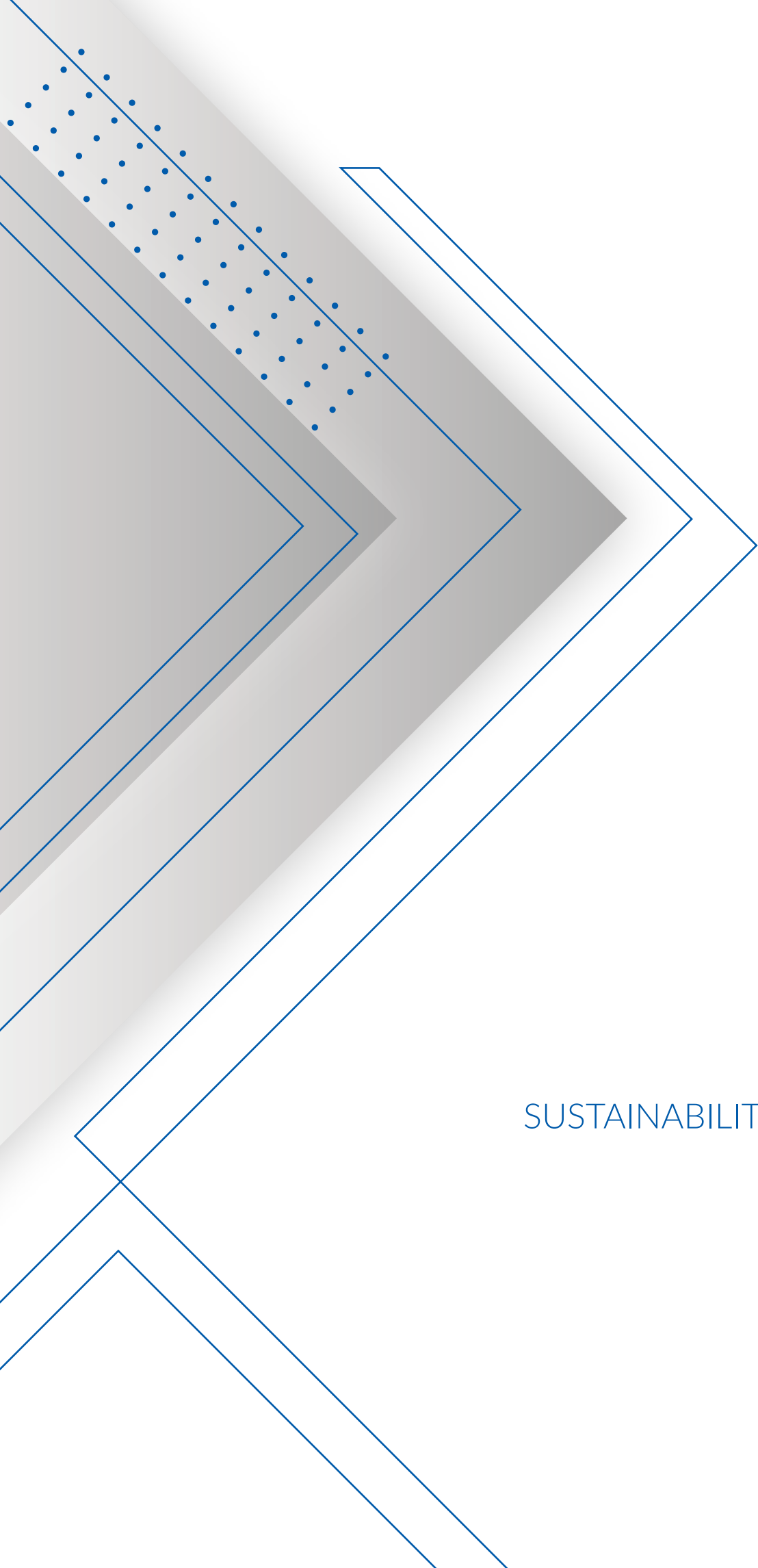
The second strategic direction aims at improving the efficiency of the operating model through process simplification, optimization of the territorial network and automation of internal activities. These measures are intended to increase productivity, reduce operational complexity and improve the customer experience.

Digital transformation represents a central element of the strategy, supported through investments in IT infrastructure, the development of digital channels and the automation of processes. These initiatives aim to increase operational efficiency, expand access to banking services and adapt the business model to new consumption trends.

At the same time, the Bank considers adapting its organizational structure and developing internal competencies, with a focus on areas with direct impact on business growth and compliance with regulatory requirements.

The strategy for the period 2026–2029 aims to strengthen financial performance through increased profitability and improved operational efficiency, while maintaining a solid capital and liquidity position.

Overall, the assumed strategic directions aim to strengthen the Bank's position within the banking system, increase its relevance in customer relationships and leverage market opportunities in a sustainable manner adapted to the economic and regulatory environment.



SUSTAINABILITY REPORT

## 7. SUSTAINABILITY REPORT

Exim Banca Românească carries out two categories of activities:

**A. Commercial banking activity carried out on its own account**, in accordance with the applicable banking legislation and oriented towards economic, prudential and risk criteria specific to a universal commercial bank;

**B. Activity carried out in the name and on behalf of the Romanian state (NCS)**, based on the legal mandate, having public policy objectives and governed by the regulatory framework issued by the mandating authority, which, starting with 1 October 2025, covers:

- The administration of financial instruments issued in the name and on behalf of the state (NCS) until their maturity;
- The performance of activities specific to an Export Credit Agency, for an indefinite period.

Separate policies, procedures and governance systems apply to each of these activities.

Similarly, **sustainability governance processes are differentiated**:

- The commercial banking activity is governed by the Bank's internal ESG policies;
- The activities carried out under mandate are subject to the legislative framework and standards established by the mandating authority.

Considering this dual structure of activities, the information presented in **Chapter 7 – Sustainability Report** is structured separately for the two business directions. **Aspects specific to the activity carried out in the name and on behalf of the state are presented, as appropriate, in subchapter 7.5**, with cross-references introduced in the relevant sections of the chapter.

### 7.1 General information on own-account activity

#### 7.1.1 Basis for preparation of the sustainability statement

##### 7.1.1.1 General basis for the preparation of the sustainability statement – BP-1

The sustainability report for 2025 presents the information necessary for understanding the Bank's impact on sustainability matters and the information necessary for understanding how sustainability matters affect its development, performance and position. It has been 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 National Bank of Romania Order no. 1/2024 amending and supplementing National Bank of Romania Order no. 27/2010 approving the accounting regulations compliant with International Financial Reporting Standards and amending and supplementing National Bank of Romania Order no. 6/2015 approving accounting regulations compliant with European Directives, which transpose into Romania Directive (EU) 2022/2464 on sustainability reporting (CSRD).

This represents the fifth non-financial reporting exercise of Exim Banca Românească. During the first three years, reporting was carried out in accordance with 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), and in the fourth year reporting was carried out in accordance with CSRD and covered the activity performed during the period 1 January 2024 – 31 December 2024.

The report was prepared at consolidated level and includes information regarding the activity of Exim Banca Românească, as well as certain information considered relevant regarding its subsidiary Compania de Asigurări – Reasigurări Exim Romania (EximAsig). The information provided regarding EximAsig takes into account the specific nature, size and complexity of its operations, the data points including only those items with a relevant influence that could be incorporated into consolidated quantitative indicators or that are implemented differently at individual level compared to group level, such as policies. Clarifications have been included in the relevant chapters of the report regarding whether or not the information presented includes information about EximAsig. In the absence of such clarification, it shall be considered that information about EximAsig is not included in that section of the report.

The purpose of consolidation is the same as that of the financial statements. However, EximAsig currently has no reporting obligations at individual or consolidated level in accordance with Article 19a paragraph (9) or Article 29a paragraph (8) of Directive 2013/34/EU, as transposed at local level by the Financial Supervisory Authority (ASF).

The Sustainability Report also includes information regarding significant impacts, risks and opportunities related to the Group through its direct and indirect business relationships within the upstream and/or downstream value chain (“value chain information”).

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

The Bank has also not applied the exemption from disclosing information on imminent developments or matters under negotiation, as provided for in Article 19a paragraph (3) and Article 29a paragraph (3) of Directive 2013/34/EU.

The materiality analysis carried out in 2024 was reviewed in 2025 to integrate the amendments introduced by the Omnibus I package, the ESRS updates for Wave 1 entities and the clarifications regarding reporting under the EU Taxonomy, as well as the recommendations of the external auditor formulated following the audit of the 2024 sustainability statement. The materiality analysis also included the activity of the subsidiary Compania de Asigurări – Reasigurări Exim Romania (EximAsig).

Thus, throughout the report, information is provided regarding 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 level of management bodies and oversight, strategy, business model and value chain, stakeholders’ interests and views, significant impacts, risks and opportunities, policies, actions, resources and indicators related to material matters. The report also includes the information required under Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (EU Taxonomy), in accordance with the delegated acts adopted for its implementation.

At the same time, in accordance with the provisions of CSRD transposed locally through National Bank of Romania Order no. 1/2024, the Sustainability Report of the Exim Banca Românească Group was subject to a limited independent assurance engagement performed by Deloitte Audit S.R.L.

#### 7.1.1.2 Specific circumstances of the sustainability statement – BP-2

##### 7.1.1.2.1 Time horizon

The Sustainability Report forms an integral part of the Report of the Board of Directors and covers the reporting period corresponding to the financial year 2025.

The time horizons considered within the double materiality analysis, both for impact materiality and financial materiality, are aligned with those defined in ESRS 1, section 6.4, namely: short term (0–1 year), medium term (1–5 years) and 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 therefore is required to prepare the sustainability statement at Group level, respectively by including its subsidiary EximAsig, given that the latter does not have individual reporting obligations.

At the same time, the Sustainability Report has been extended to include information regarding significant impacts, risks and opportunities related to the Group through its direct and indirect business relationships within the upstream and/or downstream value chain (“value chain information”). After making reasonable efforts to obtain such information, the data required to be reported regarding the upstream and downstream value chain were estimated using all reasonable and supportable information available, such as sector-average data and other proxies.

The Bank uses certain indicators that include data regarding the upstream and/or downstream value chain estimated using indirect sources, such as sector-average data or other proxies, mainly in relation to the calculation of greenhouse gas emissions. Details regarding the indicators, the basis of preparation, the resulting level of accuracy and any actions planned to improve accuracy in the future with respect to greenhouse gas emissions calculations are presented in chapter 7.2.2 on Climate change.

With regard to the identified value chain, its main components are presented below:

<b>Upstream and own operations</b>	<b>Relationship with business partners (commercial partnerships, suppliers)</b>
	<b>Buildings, equipment, owned assets, vehicle fleet</b>
	<b>Human capital (employees and their representatives)</b>
	<b>Compliance with legal and regulatory requirements</b>
<b>Downstream</b>	<b>Retail (exposures related to individuals, sole traders, microenterprises)</b>
	<b>Non-retail (exposures related to small, medium and large enterprises, public sector)</b>

#### 7.1.1.2.3 Sources of estimation and outcome uncertainty (BP-2\_09)

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

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

- in reporting key performance indicators in accordance with the EU Taxonomy (presented in subchapter 7.2.1), the Bank bases its analysis regarding eligibility and/or alignment also on information received from counterparties that themselves have reporting obligations in accordance with CSRD;
- for the calculation of greenhouse gas emissions, the Bank uses estimates based on measurement techniques involving questionnaires addressed to relevant parties, such as the measurement of CO<sub>2</sub> emissions related to employee commuting;
- for certain reported quantitative indicators (e.g. carbon footprint, presented in subchapter 7.2.2), the Bank uses assumptions, approximations and professional judgements including:
  - o the use of EUROSTAT values per unit of output for emission factors and the approximation of output through revenues – for the calculation of financed emissions at counterparty level;
  - o the use of PCAF “n/a” values in cases of mortgage loans without information regarding the EPC class of the property;
  - o estimates regarding the classification of certain exposures by CAEN subsectors;
  - o the use of consolidated energy consumption values where detailed data are not available.

Accordingly, the main sources of uncertainty (for example, dependence of values on the outcome of a future event, on a measurement technique, or on the availability and quality of data from the entity’s upstream and/or downstream value chain), as well as relevant limitations, assumptions, approximations and judgments, are presented in the specific sections of this report (for example, sections 7.2.1 and 7.2.2).

#### 7.1.1.2.4 Changes in the preparation or presentation of sustainability information

The Sustainability Report for 2025 represents the second sustainability statement prepared by the Bank in accordance with ESRS Standards and, according to their provisions, reporting entities are required to present comparative data with the previous period in order to facilitate the creation of an overview of progress made compared to the reference year.

#### 7.1.1.2.5 Reporting errors from previous periods

During the preparation of the Sustainability Report for 2025, certain inconsistencies related to the 2024 reporting were identified and corrected in the area of indicators associated with the EU Taxonomy.

These mainly concerned the completion of certain information within the standard reporting templates applicable to certain economic activities, as well as the revision of calculation methodologies and interpretation of reporting requirements for certain key performance indicators (KPIs) – Green Asset Ratio (GAR).

The adjustments resulted from subsequent clarifications regarding the application of the regulatory framework and from the strengthening of internal processes for data collection, validation and reporting.

The corrections performed improved the accuracy and comparability of the reported information without significantly affecting the overall picture previously presented. Comparative values were revised accordingly, where appropriate.

#### 7.1.1.2.6 Particularities in the reporting process

As a general rule, this Sustainability Report includes information derived only from legislative acts or from generally accepted sustainability reporting frameworks, in particular those provided by the ESRS Standards. The double materiality analysis was carried out in accordance with ESRS requirements and, where relevant, supported by internationally recognized reference standards and guidelines (such as UNEP, GRI, SASB, ENCORE or OECD publications), used exclusively as complementary methodological sources.

With regard to the calculation of greenhouse gas emissions (GHG), the Bank considered the principles and requirements of the GHG Protocol. For financed emissions under Scope 3, Category 15, the Bank considered the PCAF calculation standard, noting that the applied methodology presents certain deviations from the PCAF 2022 version, determined by data availability and portfolio-specific characteristics. Additional details regarding the methodological approach and these deviations are presented in the chapter dedicated to GHG emissions.

At the same time, the Bank 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 and in the Commission delegated regulations specifying the content and other modalities of such information, including the information related to each environmental objective.

#### 7.1.1.2.7 Inclusion of information by reference

This report does not contain cross-references to the Directors' report or to the related financial statements, all necessary information being provided within this Report.

### 7.1.2 Governance

#### 7.1.2.1 Role of the 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 Executive Committee. The Bank's senior management is ensured by the natural persons empowered with the day-to-day management of the credit institution.

Starting with 12 February 2025, following the authorization by the National Bank of Romania of the new directors appointed pursuant to General Meeting of Shareholders Resolutions no. 12 and 13 dated 25.11.2024, the structure of the Board of Directors of Exim Banca Românească consists of 9 directors, respectively 4 executive directors and 5 non-executive directors, of whom 4 are independent non-executive directors. During the period 01.01.2025 – 11.02.2025, the structure of the Board of Directors consisted of 5–8 directors, correlated with the process of authorization of the new directors by the National Bank of Romania following the above-mentioned General Meeting of Shareholders Resolutions.

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

Members of the Board of Directors and of the Executive Committee of Exim Banca Românească must possess the necessary qualifications for holding management positions, must understand the role they perform within corporate governance and must be able to act objectively, critically and independently in exercising their supervisory and management responsibilities. These obligations apply both with regard to the position held within the management body (management body in its supervisory function and senior management, respectively) and with regard to their position within the Bank's specialized committees, in the case of non-executive members.

Members of the management body of Exim Banca Românească must have adequate professional knowledge, good reputation, honesty, integrity and independent thinking, regardless of the duties and responsibilities specific to the respective position, including the capacity held within the management body and within its supporting committees

(details regarding the expertise of members of the management body, access to training and consultancy are presented in subchapter 7.1.3.3).

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

With regard to gender diversity within the Bank's management body, among the members of the Board of Directors during 2025, 22% compared to 20% in 2024 represented the proportion of female members and 78% compared to 80% in 2024 represented the proportion of male members.

#### 7.1.2.1.2 Roles and responsibilities of the bodies in overseeing the management of significant impacts, risks and opportunities

In accordance with the Rules of Organization and Functioning (ROF) of Exim Banca Românească, the Board of Directors is responsible for establishing the strategy, objectives and policies applicable to the Bank, monitoring the management decision-making process and ensuring a rigorously designed governance framework that ensures compliance with legislation, banking regulations and the principles of good corporate governance practice developed by the OECD, as well as for implementing the strategic objectives regarding sustainability and aligning the Bank with sustainability requirements.

Both the Board of Directors and the supporting committees of the management body in its supervisory function have responsibilities in establishing a strategic and procedural framework for managing impacts on the economy, environment and society, including human rights.

The responsibilities of the members of the Board of Directors are in accordance with the mandate received from the shareholders, with ultimate responsibility for the Bank's performance. The Rules of Organization and Functioning specify responsibilities such as establishing, approving and supervising the implementation of the general business strategy and of the key policies of the credit institution, taking into account the applicable legal and regulatory framework, the financial interests and long-term solvency of the credit institution, objectives centred on the concepts of sustainability and durability.

In view of this responsibility, the Board of Directors establishes and approves the Bank's sustainability strategy for a horizon of at least 3 years, outlining objectives related to the three dimensions Environmental, Social and Governance, in close correlation with the business strategy.

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

At the same time, the Rules of Organization and Functioning of Exim Banca Românească include the responsibilities of the Board of Directors and of its advisory committees regarding the approval of strategies and policies and the supervision of their implementation, including ESG principles included in the sustainability strategy, remuneration and nomination policies, the assessment of the suitability of members of the management body, etc.

Members of the management body have also been assigned specific sustainability-related objectives within their respective areas of activity and expertise, ensuring alignment of performance indicators and facilitating the organic development of ESG initiatives in order to achieve the related objectives.

The Executive Committee, as the senior management body, is responsible for implementing the applicable strategy, objectives and policies intended to ensure compliance with legislation and banking regulations, as well as for implementing strategic sustainability objectives and aligning the Bank with sustainability requirements. The Executive Committee ensures the resources necessary to achieve strategic sustainability objectives and reports on their implementation status to the Board of Directors.

The Risk Management Committee ensures that the Bank adequately incorporates ESG risks into the risk appetite statement and framework, the business strategy and the risk management framework.

Specifically, the Chair of the Risk Management Committee, in the context of responsibilities related to risk oversight, supervises the implementation of the ESG strategy at Bank level, as well as the alignment of risk management policies with sustainability standards.

Verification of the alignment of internal regulations with ESG standards falls within the responsibilities of the Audit Committee, which evaluates the operating model, business and strategic planning, data and processes, public disclosures in accordance with regulatory requirements and key elements of a sustainable finance framework.

The Nomination Committee monitors the implementation of ESG standards in accordance with the regulatory framework and relevant best practices, promoting diversity and inclusion policies, ensuring ESG-related training programmes and integrating sustainability objectives into performance evaluations.

The Remuneration Committee evaluates the alignment of the remuneration policy with the Bank's environmental, social and governance objectives and ensures compliance with the relevant principles and standards. At the same time, the Remuneration Committee ensures that the general principles and policies regarding staff remuneration and benefits are aligned with the business strategy, the objectives included in the sustainability strategy, the values and long-term interests of the Bank and other responsibilities, as specified in the Rules of Organization and Functioning.

With regard to the activity performed in the name and on behalf of the State, the roles and responsibilities related to the assessment of sustainability risks are presented in subchapter 7.5, GOV-1 NCS.

The updates introduced in the Rules of Organization and Functioning (ROF), in the Policy on the governance framework and in the Sustainability Policy clarify the roles and responsibilities of the management body and of its committees in overseeing the sustainability framework, including the manner in which the Bank identifies and manages the related risks and opportunities.

At the same time, by the end of 2026 the Bank will align the strategy for managing significant risks with the ROF as regards the monitoring and management of material risks by including responsibilities related to the monitoring and management of risks associated with sustainability matters.

Thus, the strategy for managing significant risks will include specific control responsibilities aimed at managing exposure to significant risks, taking into account risks related to sustainability matters. The strategy for managing significant risks is approved at the level of the Board of Directors, which also exercises the role of supervising how the strategy is implemented by senior management.

For 2026, the Bank will focus its efforts on strengthening the integration of ESG aspects into existing risk management processes, with priority given to the credit risk area. The objectives for the reporting period aim at:

- (i) continuing the integration of ESG factors and climate and environmental risks into credit risk appetite and credit risk assessment processes;
- (ii) developing a gradual framework for monitoring climate and environmental risks, adapted to current operational capacities; and
- (iii) initiating the analysis for integrating these risks into the internal processes for assessing capital and liquidity adequacy, in line with market best practices, to the extent that this becomes applicable.

#### **Establishing and monitoring ESG targets (GOV-1\_14)**

The Bank's ESG targets and objectives are established within the process of drafting and updating the Sustainability Strategy, coordinated by the Sustainability Management Officer and endorsed by the relevant structures, and subsequently submitted for approval to the Board of Directors. At present, the Bank has a set of ESG strategic objectives defined in the strategy, while ESG policies and the list of operational KPI/KRI are under development within the project dedicated to the ESG risk management framework. Once finalized, these will support a formal system of measurable targets and performance and risk indicators.

Monitoring progress against the ESG objectives established in the strategy is performed annually through consolidated reports prepared by the sustainability, risk, business and support structures, which are analysed by the Executive Committee and subsequently submitted for the information of the Board of Directors. During the transition period until the formalization of policies and KPI/KRI, progress monitoring is carried out mainly against strategic objectives, and the implementation of the recommendations resulting from the project dedicated to ESG risks will enable the transition to a periodic (semi-annual/annual) monitoring system, with quantitative indicators and escalation methods integrated into risk management processes (including ICAAP/ILAAP, risk appetite and credit analysis).

Thus, as the new ESG policies, assessment tools, KRI/KPI and the ESG dashboard are approved, the Risk Management Committee will oversee their application within the risk framework, while the Executive Committee will monitor their operational implementation and the reporting of progress to the Board of Directors.

### 7.1.2.1.3 Expertise and competencies of the bodies regarding sustainability matters or access to such expertise and competencies

Within the process for assessing the suitability of members of the management body, the Bank evaluates their adequacy based on the criteria provided by Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy, approved by Law no. 227/2007, as subsequently amended and supplemented, and by National Bank of Romania Regulation no. 5/2013 on prudential requirements for credit institutions, as subsequently amended and supplemented, taking into account the documentation related to the candidacy for the position of member of the management body.

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

At the same time, Exim Banca Românească continuously monitors the suitability of the members of the management body in order to identify, in the context of any new relevant element, situations requiring a reassessment of their suitability and performs such reassessments where necessary.

In order to ensure continuous training and development of the members of the management body, in line with the responsibilities of the positions for which they have been appointed, the Bank prepares and approves annually the Training Programme for members of the management body, which defines the training and development topics necessary for achieving the established objectives.

For 2025, the Training Programme for members of the management body was developed in accordance with the provisions of National Bank of Romania Regulation no. 5/2013 on prudential requirements for credit institutions, as subsequently amended and supplemented, which stipulates that members of the Bank's management body, respectively members of the Board of Directors and of the Executive Committee, must possess adequate training and an appropriate level of professional expertise in order to effectively achieve the strategic and business objectives, as well as the objectives of the Sustainability Strategy of Exim Banca Românească for the period 2025–2027.

The objectives of the annual Training Programme for members of the management body for 2025 also included ensuring the fulfilment of measures related to the sustainability and ESG strategy, as well as the continuous updating of the knowledge of members of the management body in order to ensure the level of professional competence, expertise and skills necessary for fulfilling their responsibilities, including in the area of sustainability. In this context, the Training Programme for members of the management body for 2025 included the module Risks, opportunities and challenges related to ESG, and training based on updated information intended to ensure knowledge and competence in the area of sustainability was provided by experts in the field.

It should be noted that ESG risks are reflected within the Bank's standard risk categories, and the expertise and competencies of members of the management body required for their management are 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 covering a three-year period, which is updated annually, the latest version being for the period 2026–2028. The Sustainability Strategy is developed with the objective of ensuring an appropriate framework for the implementation of sustainability requirements and is aligned with the sustainable development objectives of the European Union. In this regard, strategic objectives have been defined concerning the Bank's fundamental approach to sustainable development and specific actions have been established in correlation with business objectives. At the same time, the strategy has been enhanced through the introduction of key performance indicators related to the Bank's environmental, social and governance aspects, which are to be implemented starting with 2026.

The Business Strategy and Commercial Monitoring Department reports annually to the Executive Committee and/or the Board of Directors on the status of achievement of strategic objectives and the implementation of measures related to sustainability requirements.

At the same time, the Financial Accounting Division ensures the reporting of sustainability-related matters by establishing the methodology applicable to the requirements of the EU Taxonomy Regulation and by collecting, within the Directors' Report, information from the impacted structures, and ensures the audit of the Sustainability Report in accordance with applicable requirements.

The Directors' Report includes sustainability reporting, namely the information necessary for understanding the undertaking's impact on sustainability matters and the information necessary for understanding how sustainability matters affect the undertaking's development, performance and position, this report being validated by the auditors through a limited assurance opinion. The accuracy of reporting is ensured by the internal structures responsible for formalizing the sections of the report, where the information is centralized and reconciled.

At the same time, any other material sustainability matters included within the internal regulatory framework are submitted for information and/or approval to the management body in accordance with its competence limits.

In order to prepare sustainability reporting in accordance with the national legislation transposing the CSRD and with the ESRS reporting standards, the following main steps were completed:

- Establishing CSRD applicability – identifying the scope of applicability both at the level of the Exim Group and of the stakeholders contributing to the provision of relevant information in the context of sustainability reporting;
- Updating the double materiality analysis – identifying relevant sustainability matters both from the perspective of the Bank's impact on people or the environment and from the perspective of risks and opportunities to which the Bank is exposed;
- Reassessment and adjustment of Impacts, Risks and Opportunities (IRO) – identification of impacts, risks and opportunities (IRO) and their assessment from the perspective of significance;
- Identification of reporting requirements – determining material topics, subtopics and sub-subtopics and assigning the related data points in accordance with ESRS;
- Preparation of the sustainability statement – preparing the information related to the data points and consolidating them into the sustainability statement based on the identified reporting requirements.

The double materiality analysis for 2025 was reviewed and improved by Ernst & Young with the involvement of experts from within the Bank and of stakeholders, and its results were validated at the level of the management body. At the same time, the Sustainability Report was 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 regulations.

#### 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 Strategy and business model of Exim Banca Românească and of the Strategy for managing significant risks, aligned with the Bank's objectives, values and long-term interests.

The remuneration policy is applicable also to executive and non-executive members of the management body, respectively members of the Board of Directors and of the Executive Committee.

The remuneration of executive/non-executive members of the management body is linked to the quantitative and qualitative performance objectives and indicators assumed through the mandate agreements concluded with the majority shareholder (the Ministry of Finance).

The variable remuneration of executive members of the Board of Directors is based on annual financial and non-financial performance indicators negotiated and approved by the majority shareholder. The objectives assumed through the sustainability strategy by the Bank's management bodies are aligned with the Strategy and business model of Exim Banca Românească, so that the achievement of these objectives ensures alignment between the Bank's remuneration practices, the interests of senior management and the Bank's sustainability objectives. Currently, there is no direct linkage between the variable remuneration of 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 assessing the reporting boundaries of the value chain. Over the years, the financial services sector has faced numerous challenges and risks, and in order to remain profitable in the long term, these challenges require a strong culture of risk management and sustainability.

The Bank performs various due diligence activities with regard to sustainability matters.

Compliance with appropriate due diligence processes is of particular importance for managing risks associated with sustainability information reporting, including regulatory compliance risks.

The overview below provides information on the sections of the Sustainability Report that contain the main elements of the due diligence process, respectively the procedures performed or processes implemented to identify actual and potential negative impacts on the environment and people in connection with the Bank’s activities.

MAIN ELEMENTS OF THE DUE DILIGENCE PROCESS	SECTIONS OF THE SUSTAINABILITY STATEMENT
a) Integration of the due diligence process into governance, strategy and the business model	General information: Strategy, Sustainability priorities, Governance
b) Engagement with affected stakeholders at all main stages of the due diligence process	General information: Stakeholder engagement Own workforce: Employee engagement Consumers and end-users: Engagement of customers and suppliers Users of information: Shareholders and media
c) Identification and assessment of negative impacts	General information: Sustainability activities within the business model, Impact materiality Climate change: Assessment of climate change impacts Own workforce: 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 Own workforce: Commitments and approach under the Human Rights Policy; Commitments under the Diversity, Equity and Inclusion Policy; Employee well-being; Equal treatment and opportunities
e) Monitoring the effectiveness of these efforts and communication	Climate change: Climate targets and progress Own workforce: Working conditions – engagement survey; Gender pay gap; Gender diversity in management positions Consumers and end-users: Access to quality information – Actions and performance Consumers and end-users: Privacy – Actions and performance Governance: Financial crime compliance training

### 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 assesses the impacts, risks and opportunities identified at the Bank level and determines the Bank-specific material aspects at topic, subtopic and sub-subtopic level.

The double materiality analysis is prepared in accordance with ESRS and, based on the resulting material aspects, the Bank-specific data points were determined starting from the list of data points provided by EFRAG in accordance with ESRS. The iteration for 2025 was carried out in collaboration with the external consultant Ernst & Young and was based on applicable standards and guidelines, thus ensuring the completeness of the information to be reported. At the same time, the Bank relies on existing internal information and data, ensuring their integrity through specific systems and procedures. Within certain processes, the Bank collects information across the value chain depending on availability or uses proxies or internal estimates based on specific standards, professional judgment or best practices.

Certain processes for collecting and analysing information for sustainability reporting purposes, particularly regarding the collection of data and their analysis in the context of GAR calculation and GHG emissions, are formalized through internal procedures approved by the competent bodies, thus ensuring compliance with legal or regulatory requirements, including the existence of internal controls and data collection and reporting templates that ensure the timely availability of information.

The process of preparing the Sustainability Report, like any other internal process of the Bank, is subject to internal control carried out across all lines of defence, as follows:

- The first line of defence is represented by the structures providing the data. The entire process of data collection and reporting is carried out by senior staff, and the entire activity is validated according to reporting lines;
- The second line of defence is represented by the risk management function, which is responsible for preparing the Sustainability Report. Thus, all sources of information supporting this process are reconciled;
- The third line of defence is represented by the internal audit function which, in accordance with the audit plan approved by the Board of Directors, also covers sustainability reporting.

## 7.1.3 Strategy

### 7.1.3.1 Strategy, business model and value chain – SBM-1

This section presents exclusively the Bank's commercial activity. Relevant aspects regarding the activity performed in the name and on behalf of the State (NCS) are presented separately in Subchapter 7.5, SBM-1 – NCS.

#### 7.1.3.1.1 Key elements of the overall strategy related to sustainability matters

For Exim Banca Românească ("the Bank"), sustainability means focusing on conducting business in a responsible and efficient manner aligned with the European Union's sustainable development objectives.

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

Thus, from the perspective of the objectives included in the commercial strategy and the business plan for 2025–2028, Exim Banca Românească has as a specific strategic objective sustainable development, aimed both at ensuring adequate management of ESG risks and at directing financial flows towards the sustainable development of the economy, with a low level of greenhouse gas emissions and resilience to climate change, through the development of green products and the expansion of the related lending portfolio.

In this context, through the commercial strategy and the business plan for 2025–2028, the Bank established the investment projects considered relevant for the development of sustainable business activities, respectively:

- Projects related to activities considered within the category of climate-destination financing, such as renewable energy, energy efficiency, waste and wastewater reduction, transport and special environmental financing or investments in technologies;
- Projects in the field of the circular economy;
- Strategic projects in the defence industry sector (the European ReArm programme, national companies and/or joint ventures).

For the implementation of these projects, both for the corporate and retail business lines, there are specific sustainability-related development directions, including:

- Development of products and solutions specific to sustainable lending;
- Development of a green/climate finance loan portfolio for SME and Large Corporate segments;
- Co-participation in major sustainable financing projects for SME and Large Corporate segments;
- Facilitating access to financing for SME clients through the use of guarantee instruments provided by the European Investment Fund under the InvestEU programme.

Active implementation of investment projects financed through the NRRP, Cohesion Policy and CAP Strategic Plan 2027 funds also represents another development direction aimed at supporting the transition towards a sustainable economy.

The commercial strategy has been aligned with the Bank's Sustainability Strategy, and the objective of increasing sustainable financing has been detailed into sub-objectives with defined timelines included in the action plan. These objectives target the following:

- implementation of sustainable lending principles for corporate clients, with the effect of increasing green financing and developing a sustainable loan portfolio;
- development of products and solutions specific to sustainable lending, a green/climate finance loan portfolio, as well as co-participation in major sustainable financing projects for corporate clients;
- development of green/social products for retail clients;
- issuance of green/social bonds;
- support for public programmes financing companies;
- promotion of a pro-environmental approach through awareness actions among clients regarding climate and environmental risks, including to support or accelerate transition plans;
- inclusion in communication plans of messages presenting sustainability actions.

In 2025, the General Sustainable Financing Framework was developed, to be formalized in Q1 2026, establishing the principles underlying the classification of green/sustainable loans and a common understanding of sustainable financing, taking into account the LMA Guidelines, ICMA Principles and the EU Taxonomy. The document will be used both for qualifying and tagging commercial transactions and for preventing greenwashing within the processes for identifying sustainable financing for corporate client segments. For the relevant corporate client segments, the Bank will perform enhanced ESG analysis in order to appropriately manage ESG risks. This General Sustainable Financing Framework does not cover the activity of EximAsig.

Corporate and Retail clients will be addressed through tailored ESG-component products and services. Green financing categories will primarily target: green buildings, sustainable transport, energy efficiency and renewable energy.

Implementation of the EU Taxonomy remains a gradual process, adapted to the current level of data availability and internal resources. For 2025, the Bank maintained the direction established in the previous year, focusing on the core activities necessary to prepare alignment with Taxonomy requirements.

Accordingly, actions continued regarding the updating of client questionnaires and the improvement of processes for collecting relevant data in order to identify eligible and aligned activities. At the same time, options were explored for strengthening internal ESG analysis capabilities, and credit facilities guaranteed by the European Investment Fund (EIF), the European Investment Bank (EIB) and the Black Sea Trade and Development Bank (BSTDB) were operationalized, supporting sustainability objectives, even though the Bank has not yet launched dedicated green products. In the context of legislative changes in 2025, including the narrowing of the CSRD scope through the Omnibus I package, the Bank's approach remains prudent and phased, focused on developing the data infrastructure and strengthening internal analytical capabilities.

### 7.1.3.1.2 Key elements of the business model and the value chain

The business model of the Exim Banca Românească Group includes Exim Banca Românească and its subsidiary based in Romania, namely Compania de Asigurări – Reasigurări EXIM România (EximAsig). The Exim Banca Românească Group provides retail and corporate banking activities through Exim Banca Românească, and through its subsidiary EximAsig provides insurance services to clients. The essential elements of the business model and value chain presented below address banking-specific activities, namely those carried out by Exim Banca Românească.

**From the content of the business model, we observe that both the Bank's mission and vision** are connected to the sustainable development of Romania's economy, with respect for the environment, development to be achieved through sustainable business partnerships for social well-being and economic performance.

**The Bank's Vision** – “Exim Banca Românească has an appetite for innovation and development and, as a solid credit institution, aims to provide customized financial solutions to clients that confirm its status as a preferred banking partner in Romania. Exim Banca Românească maximizes the use of its resources and its position in the banking market, focuses on stimulating clients' business potential and contributes to the sustainable development of Romania's economy and to strengthening the Romanian banking system. Moreover, as the performance of any organization is closely linked to the level of development of the community in which it operates and of 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 Romania's future together.”

**The Bank's Mission** – “The mission of Exim Banca Românească is to support the growth of prosperity in Romania, to build sustainable partnerships for the social well-being and economic performance of its clients by accelerating financial intermediation.”

**The Bank's main business lines** are developed along two main directions: activity carried out in its own name and on its own account (universal commercial banking activity) and mandate activity (activity carried out in the name and on behalf of the State).

The Bank aims to lend responsibly, encourage savings and sustainable financing in general, and support all its clients through advisory services and appropriate and sustainable financial solutions, whether retail, corporate or public sector clients. The activities carried out by Exim Banca Românească as a **universal commercial bank** are structured into three main business lines: Corporate, Retail and Treasury. The distribution channels used by the Bank for its own-account activity are:

- Territorial units (Branches, Business Centres), the Corporate Unit for large corporates and financial institutions;
- Digital channels (Internet & Mobile Banking, Contact Centre);
- ATM/MFM network;
- Credit intermediaries for individuals.

The national territorial network of Exim Banca Românească comprises 102 territorial units (77 retail branches and 26 Business Centres), with no plans for expansion into international markets through the establishment of branches or representative offices abroad. The range of operations specific to each type of branch is as follows:

- Retail branches primarily serve the retail business line, but also the corporate business line for operations related to savings, cash and non-cash transactions, and the use of current account packages (including Internet Banking);
- Business Centres are mainly responsible for the sale of all products addressed to legal entity clients with turnover exceeding RON 5 million and represent the main interaction points in the relationship between these clients and the Bank.

The client service model described above is primarily based on client requirements, which have been translated into a model closely aligned with client needs through the development of both physical distribution channels (network/intermediaries/ATM-POS) and digital channels. At the same time, the specific requirements of the shareholders have also been taken into account through the development of an efficient and profitable business model.

Digital servicing of retail clients, complemented by the development of products with a sustainability component, represents an essential link in the value chain, contributing to value creation both for clients and shareholders. In the context of accelerating digitalization, the focus will be placed on strengthening and expanding services in the payments and transactions area through the introduction of new functionalities and the optimization of the customer experience both within the ATM network and at the level of payment acceptance.

With regard to cash infrastructure, the expansion and modernization of the ATM network will continue through the installation of terminals in areas with high profitability potential, which will allow access to advanced services and functionalities such as: receipt of funds via Western Union, cash deposits into own accounts or those of other beneficiaries in RON and foreign currency, foreign exchange operations (contact and contactless), as well as bill payments to approved service providers.

At the same time, increasing accessibility of payments at merchants will be supported through an extensive project for expanding payment acceptance, based on the implementation of the Bank's own POS terminal network. The project targets both physical point-of-sale payments and the development of acceptance capabilities in the e-commerce environment, as well as the implementation of top-up-type solutions, contributing to the diversification of payment channels and to increasing the level of use of digital instruments by clients.

**Servicing of corporate clients** focuses on supporting them both through Branches (for certain operations), Business Centres and the Large Clients and Project Finance Division. The operational flow within Branches also covers servicing legal entity clients such as SBB, SME and Large Corporate clients for certain types of operations such as: collection of documentation for client/account opening, receipts/payments operations, acceptance of debit instruments, sale of cards/salary agreements.

#### 7.1.3.1.3 How stakeholders' interests and views are considered in the strategy and business model

The Bank has continuously interacted with stakeholders in order to properly identify impacts, risks and opportunities (IRO). Based on these interactions and on the results of the double materiality analysis (DMA) and the related IROs, the Bank continuously shapes its business strategy, products, distribution channels and development commitments included in its business plans.

##### **Purpose of stakeholder engagement**

Stakeholders' views are taken into account in the Company's strategy and business model. Stakeholder engagement enables the Bank to:

- collect valuable information and feedback on topics such as sustainability, regulatory compliance and corporate performance. This supports the Bank in understanding stakeholders' expectations and concerns and contributes to decision-making and development strategy;
- identify and address material issues by considering critical topics;
- support sustainability objectives through their promotion: engagement with stakeholders helps increase awareness and obtain broader support for achieving these objectives;
- improve transparency and accountability: stakeholder engagement promotes transparency and accountability by providing stakeholders with information regarding 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 obtain mutual benefits.

##### **Consideration of stakeholder engagement results**

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

- incorporation of feedback;
- awareness initiatives;
- support for decision-making processes: this approach helps ensure that decisions are well informed and take into account the interests of relevant stakeholders.

By integrating the results of stakeholder engagement into its processes, the Bank ensures that stakeholders' interests and views are taken into consideration, supporting sustainability and the Company's long-term success.

##### **Inclusion of stakeholders in the materiality analysis**

The Bank actively engages with a diverse range of stakeholders, including shareholders, clients, employees, regulators and business partners. This engagement takes place through meetings, bilateral discussions and conferences. In addition to the previous iteration, during the current year the Bank carried out a targeted stakeholder and information-user engagement process. Thus, through specific questionnaires, the perceptions of employees, clients, suppliers, shareholders and media representatives regarding the impact of the Bank's activity on

sustainability topics were assessed. The selection of material topics is guided by the regulatory requirements of the European Union Sustainability Reporting Standards (ESRS).

With regard to **shareholders' interests**, the commercial strategy aims to establish **clear sustainable objectives** and to increase transparency through the **reporting of sustainability-related strategic objectives**. Accordingly, the Directors' Annual Report includes the non-financial statement as well as KPIs in accordance with the Taxonomy requirements provided under Article 8 of Regulation (EU) No. 852/2020, as subsequently amended and supplemented, and in accordance with the requirements of Regulation (EU) 2021/2178.

**For the proper management of ESG risks, an aspect relevant both to clients' and shareholders' interests**, the Bank has pursued the inclusion of ESG factors and related risks (climate and environmental risks) in the risk management strategy and in the lending policy. ESG risks are classified into three risk categories (low, medium, high), and for relevant clients/exposures an ESG Questionnaire is requested, including mitigation measures assumed by clients with high ESG risk. Starting with 2026, the Bank will place greater emphasis on the assessment and measurement of ESG risks and on methodologies for analysing environmental factors in order to implement effective management of these risks.

With regard to **access to sustainable financing**, the Bank established as a strategic objective the implementation of sustainable lending principles for corporate and retail clients, with the effect of developing a sustainable loan portfolio. The development of products and solutions specific to sustainable lending through collaboration with specialized consultants, the development of green/climate loan portfolios, as well as co-participation in major sustainable financing projects for corporate clients and retail businesses (for example, green mortgage loans) represent action directions included in the Bank's strategy, with benefits for clients concerned with sustainable development.

Digitalization, as a strategic objective serving both clients' and shareholders' interests, has transformed access to financial services by facilitating the use of mobile and online applications, enabling clients to perform transactions quickly and efficiently.

With regard to the strategy for supporting clients' green initiatives, both corporate and retail, which serves the interests of both clients and shareholders, the focus has been placed on supporting clients' transition plans demonstrating a commitment to reducing their environmental impact, either through initiatives aimed at achieving carbon neutrality, responsible supply chain management actions or other environmentally friendly practices. Accordingly, the Bank has been involved in financing green projects, particularly in the field of green energy (renewable energy projects, green buildings, recycling projects, cogeneration projects).

### **Future plans and strategies**

In 2025, sustainable lending principles for corporate clients were developed, together with a methodology for classifying sustainable financing, which will support the proper identification of projects across different macroeconomic sectors that improve positive environmental impact and reduce negative impact, while helping companies adapt to the effects of climate change.

In 2026, the Bank aims to further develop products and solutions specific to sustainable lending. The development of green/climate loan portfolios, as well as co-participation in major sustainable financing projects for corporate clients and retail businesses (for example, green mortgage loans), will represent a natural continuation of the implementation mentioned above.

The year 2025 represented the second year in which CO<sub>2</sub> emissions were calculated both at the level of the financed portfolio and at the internal/operational level. Starting with 2026 (when the first emissions trend will be identified), particular attention will be given to financed emissions in order to support decision-making aimed at reducing them. At the level of own operations, measures are being implemented to reduce the carbon footprint generated by internal/operational activities (Scope 1 & 2 emissions).

At the same time, through communication activities aimed at shaping the attitudes of colleagues, clients and society regarding sustainability-related challenges, the Bank will encourage the integration of environmental, social and governance (ESG) aspects into financial decision-making. Thus, both employees' interest in acting sustainably within the Bank and clients' interests will be supported through advisory activities and assistance for the sustainable development of their businesses.

Accordingly, in the corporate segment, discussions were initiated with clients regarding sustainability aspects, ESG pre-screening questionnaires were applied and/or sustainability reports were requested.

The Commercial Strategy and the Sustainability Strategy approved by the Bank's Board of Directors aim both at establishing clear sustainability objectives and at increasing transparency in reporting the achievement of sustainability-related strategic objectives. The results of the materiality analysis were also presented to the Board of Directors.

#### 7.1.3.1.4 Outcome of the assessment of material impacts, risks and opportunities, including how these contribute to the strategy and business model

In assessing impacts, risks and opportunities, the Bank's activity across the entire value chain (upstream & own operations, respectively downstream – clients) and across multiple time horizons (short, medium and long term) was considered. 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 affecting the Bank (outside-in perspective).

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

- ESRS E1 – Climate change
- ESRS S1 – Own workforce
- ESRS S4 – Consumers and end-users
- ESG G1 – Business conduct

Out of the 37 subtopics related to the 10 ESRS standards, the following were identified as significant:

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

Opportunities related to the integration of the sustainability concept at the Bank's level exist and are considered across several development directions, including:

- achievement of the Bank's strategic objectives to support national programmes for sustainable development and climate resilience;
- identification of new business opportunities and growth in sales across new customer segments.

The aggregated outcome by ESRS topic shows that E1, S1, S4 and G1 represent the most important sustainability areas for the Group.

Material impacts, risks and opportunities identified through the double materiality assessment process are presented and described below, including their type, positioning within the value chain and expected time horizon.

Through the 2025 iteration of the double materiality analysis, the Bank fully revised the assessment of each IRO identified as potentially material in order to determine its material nature in accordance with the requirements of the European Sustainability Reporting Standards (ESRS). The assessment complies with Annex A to ESRS 1 and EFRAG guidance on double materiality analysis.

Through the 2025 iteration of the double materiality analysis, the Bank fully reassessed each identified impact, risk and opportunity (IRO) to determine its material nature in accordance with the applicable requirements.

Impact materiality was determined based on the assessment of the severity of negative impacts (scale, scope, irremediable nature) and the significance of positive impacts (scale, scope, likelihood). Financial materiality was determined through the assessment of the magnitude of the financial effect and the likelihood of occurrence of risks and opportunities. The maximum possible score for negative impacts is 5, representing the automatic materiality threshold when any of the parameters reaches the maximum value.

Compared to the 2024 Sustainability Report, the 2025 IRO table includes, in an integrated manner, the opportunities identified at portfolio level and at the level of own operations, in accordance with ESRS 2 IRO-1 requirements and additional EFRAG guidance. These were presented separately in the 2024 report.

### Additional ESRS sectors considered in the materiality analysis (SBM-1\_08)

With regard to the downstream value chain, in the double materiality analysis for the 2025 reporting exercise, the Bank identified additional relevant sectors in accordance with ESRS, based on the structure of the lending portfolio and financed activities. These were aligned with the CAEN classification and assessed in terms of their potential to generate ESG impacts, risks or opportunities for the Bank.

The sectors considered material include the following relevant ESRS categories:

- Food industry (C10) – processing and preservation of meat, fruit and vegetables; manufacture of oils and fats; grain mill products; bakery products.
- Plastics industry (C22) – manufacture of plastic plates and profiles, plastic construction products and other plastic products.
- Metal industry (C25) – metal structures, metal doors and windows, forging, processing and machining operations.
- Construction (F41–F43) – residential and non-residential buildings, roads and motorways, utility projects, electrical installations, heating and air-conditioning systems and other specialized construction activities.
- Wholesale trade (G46) – cereals, animal feed, auto parts, construction materials, chemical products, non-specialized wholesale trade.
- Retail trade (G47) – food products, non-food goods, furniture, jewellery, pharmaceutical products.
- Public administration (P84) – general public administration activities.

For EximAsig, the analysis additionally includes the construction sector (F41–F42), depending on the structure of the insurance policy portfolio.

Sectors that did not present significant impact or risk potential were documented within the assessment process (e.g. plastic packaging production, primary metals, fuel retail, vehicle maintenance, etc.) and were justifiably excluded from the universe of impacts for 2025.

The table below presents all impacts, risks and opportunities identified as material following the double materiality analysis for the 2025 reporting exercise, structured by ESRS topics. The 2025 materiality score reflects the quantitative results of the updated assessment model.

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
<b>E1 – CLIMATE CHANGE</b>								
The Bank contributes to greenhouse gas emissions through its own operations, particularly through the use of fossil fuel vehicles and the operation of energy-intensive physical assets (administrative buildings, data centres), generating a current and negative long-term environmental impact.	Climate change mitigation	Actual, negative impact		✓				✓
The energy mix used in the Bank’s own operations (electricity, fuel and heating) generates CO <sub>2</sub> emissions that contribute to climate change, with cumulative long-term effects.	Energy	Actual, negative impact		✓				✓

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
The Bank's lending portfolio includes exposures in high carbon-emission sectors (manufacturing, automotive, construction, wholesale trade, public administration). Lending for energy-inefficient buildings or vehicles dependent on fossil fuels may increase the institution's indirect carbon footprint and contribute to climate change effects.	Climate change mitigation	Actual, negative impact			✓			✓
By financing companies that prioritize the transition to a low-carbon economy (reuse, recycling, decarbonisation), the Bank contributes to reducing GHG emissions and mitigating the effects of climate change. This includes supporting the development of EV infrastructure and circular economy solutions.	Climate change mitigation	Potential, positive impact			✓		✓	✓
Transitioning to an electric vehicle fleet and accelerating digital transformation reduce resource consumption and the operational carbon footprint. Implementing energy efficiency initiatives across the Bank's properties may also contribute to reducing the carbon footprint.	Climate change mitigation	Potential, positive impact	✓	✓			✓	✓
By implementing initiatives to reduce energy consumption and emissions, the Bank may generate a positive environmental impact.	Energy	Active, positive impact		✓		✓	✓	
Credit and market risk: increased exposure to credit risk for clients affected by carbon tax regulations, potential depreciation of collateral and the emergence of economically stranded assets in the context of the energy transition. Reputational risk: potential negative impact on the Bank's image in the case of financing projects in the fossil fuel sector or in other high-emission sectors facing major decarbonisation challenges.	Climate change mitigation	Risk			✓		✓	✓
Energy price volatility, driven by climatic or socio-economic factors (conflicts, regulations), may reduce the profitability of companies in energy-intensive sectors, increasing credit risk in the portfolio. Decarbonisation technologies (e.g. electric tractors in the agricultural	Energy	Risk			✓	✓	✓	

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
sector) represent high adoption costs for financed entities, potentially leading to increased operating costs, reduced profits and ultimately payment difficulties.								
Extreme weather events and climate change may generate significant financial losses and may affect the operations of financed entities. Incorrect assessment of climate risks in insurance products provided by EximAsig (the Bank's subsidiary) could generate financial losses due to higher-than-estimated claims.	Climate change adaptation	Risk			✓			✓
Opportunity to finance renewable energy projects, supporting the global energy transition and carbon-neutral energy production. This may generate attractive financial returns and strengthen the Bank's position as a responsible financier.	Energy	Opportunity			✓	✓	✓	✓
Significant financial opportunity through financing activities and entities supporting decarbonisation and the transition to a sustainable economy (carbon capture and storage, EV charging infrastructure, automotive manufacturers focused on resource efficiency, green buildings).	Climate change mitigation	Opportunity			✓		✓	✓
Financial opportunities may also arise from investments in entities providing climate change adaptation solutions and from financing projects incorporating climate resilience features, thereby strengthening the Bank's position in the field of sustainable finance.	Climate change adaptation	Opportunity			✓		✓	✓
<b>S1 – OWN WORKFORCE</b>								
Job security is a fundamental aspect that benefits both employees and the employer. When employees feel secure in their roles, they are more engaged, productive and loyal. A stable workforce contributes to the resilience of the financial sector and to economic growth.	Working conditions – Secure employment	Actual, positive impact		✓		✓		✓

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
The implementation of a fair compensation policy represents a fundamental pillar in ensuring adequate living standards for employees. This positive impact is directly reflected in employees' financial stability and contributes to strengthening the Bank's position as a responsible employer in the labour market.	Working conditions – Adequate wages	Actual, positive impact		✓		✓		
The Bank actively promotes the right to freedom of association as a core element of ethical labour practices. Respecting freedom of association ensures an organizational environment based on collaboration and mutual respect, protecting employees' rights.	Working conditions – Freedom of association, information, consultation and participation rights of workers	Actual, positive impact		✓			✓	✓
The collective labour agreement serves as an essential instrument in protecting and promoting employees' professional interests. Collective bargaining supports the continuous improvement of compensation packages and working conditions, strengthening the constructive relationship between management and employees.	Working conditions – Collective bargaining	Actual, positive impact		✓			✓	
The implementation of comprehensive health and safety procedures prevents workplace accidents and mitigates related risks. These measures support the well-being of employees and clients, contributing to a safe and healthy working environment.	Working conditions – Health and safety	Actual, positive impact		✓		✓		
The strategic focus on human capital development generates a sustained positive impact by strengthening a highly qualified professional workforce. Continuous investments in training and professional development programmes support employees' individual and professional growth, contributing to the institution's operational excellence.	Equal treatment and opportunities for all – Training and skills development	Actual, positive impact		✓			✓	
The implementation of diversity principles generates a positive impact by fostering a sustainable and inclusive organizational culture. This approach improves employee	Equal treatment and opportunities for all - Diversity	Actual, positive impact		✓			✓	✓

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
well-being and job satisfaction, leading to a more productive working environment.								
A potential breach of employees' personal data security could lead to serious legal consequences as a result of non-compliance with applicable GDPR requirements, affecting the institution's reputation.	Other work-related rights – Employees' privacy	Risk		✓		✓	✓	✓
The Bank may position itself as an employer of reference by ensuring job security, benefiting from higher employee loyalty, lower recruitment costs compared to competitors and improved workforce productivity.	Working conditions – Secure employment	Opportunity		✓			✓	
The implementation of competitive remuneration packages represents a competitive advantage in the industry, strengthening the Bank's ability to attract and retain talent. This may lead to enhanced reputation and improved financial performance of the institution.	Working conditions – Adequate wages	Opportunity		✓		✓	✓	
Promoting work-life balance may contribute to a working environment that supports employees' mental health, leading to increased productivity and a strengthened reputation as a responsible employer.	Working conditions – Work-life balance	Opportunity		✓		✓	✓	
A proactive approach to addressing pay inequalities is essential for creating an equitable working environment. By eliminating pay disparities, the Bank may benefit from improved employee motivation and a more balanced organizational culture.	Equal treatment and opportunities for all – Gender equality and equal pay	Opportunity		✓			✓	
Investments in continuous employee training may increase motivation, improve the professional qualifications of the workforce and generate enhanced loyalty and productivity over the medium term.	Equal treatment and opportunities for all – Training and skills development	Opportunity		✓			✓	
Maintaining a safe working environment based on respect and ethical principles contributes to employee well-being, mental health	Equal treatment and opportunities for all -	Opportunity		✓		✓		

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
and productivity, while strengthening the Bank's reputation as a responsible employer.	Measures against workplace violence and harassment							
<b>S4 – CONSUMERS AND END-USERS (IRO descriptions)</b>								
Security breaches and cyberattacks may expose clients' personal and financial data, severely undermining trust in digital services. The absence of adequate GDPR-compliant processes may lead to significant legal and reputational consequences for the Bank.	Information-related impacts	Potential, negative impact		✓		✓		✓
The Bank generates a potential positive impact by ensuring clients' access to complete and accurate information regarding the financial products and services offered. This approach supports consumers' decision-making processes and contributes to increased financial inclusion and institutional trust.	Information-related impacts – Access to high-quality information	Potential, positive impact		✓		✓		
The Bank facilitates universal access to a diversified range of financial products and services tailored to different population segments, contributing to reducing barriers to access to the banking system and supporting the social inclusion of consumers and end-users.	Social inclusion – Access to products and services	Actual, positive impact		✓			✓	
Without adequate GDPR-compliant processes and procedures, the Bank may face increased risks of data breaches and improper data usage, leading to erosion of trust in digital services, potential privacy-related harm and significant legal and reputational consequences.	Customer privacy	Risk		✓		✓	✓	
The Bank may strengthen customer relationships by demonstrating credibility through the implementation of robust data protection policies and procedures and updated IT systems that protect the institution against cyber threats.	Privacy	Opportunity		✓		✓	✓	
Facilitating customer access to high-quality information regarding the Bank's products and services may lead to higher customer	Access to high-quality information	Opportunity		✓		✓		

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
satisfaction, representing a short-term competitive advantage.								
Emerging financing models and innovative technologies create opportunities to provide financial products and services in underserved markets, generating additional revenue sources and contributing to the financial inclusion of populations with limited access to banking services.	Social inclusion – Access to products and services	Opportunity		✓			✓	
Adopting responsible, informed and customer-centric marketing practices may build a strong foundation of trust, positioning the Bank as a leader in promoting a fair financial framework and contributing to increased customer loyalty and market share.	Responsible marketing practices	Opportunity		✓		✓		
<b>G1 – BUSINESS CONDUCT (IRO descriptions)</b>								
The Bank generates a current positive impact through the implementation of a robust whistleblower protection system. This system fosters an organizational environment characterized by transparency and accountability, providing employees with the necessary mechanisms to report misconduct without fear of retaliation, while strengthening public trust in the institution.	Protection of whistleblowers	Actual, positive impact		✓		✓	✓	
The assessment of suppliers and business partners against predefined social and environmental standards may generate significant improvements in social well-being and tangible environmental benefits. The consistent application of fair payment procedures for suppliers contributes to maintaining ethical and transparent financial practices throughout the value chain.	Management of relationships with suppliers, including payment practices	Potential, positive impact		✓		✓	✓	
The Bank demonstrates a current positive impact in the area of anti-corruption through the implementation of rigorous anti-bribery and anti-corruption measures across all its operations. These measures strengthen the institution's ethical framework and ensure regulatory compliance,	Corruption and bribery – Prevention, detection and training	Actual, positive impact		✓		✓	✓	

Material IRO - Description	ESRS subtopic	IRO type	Upstream	Own operations	Downstream	Short term	Medium term	Long term
			← Value chain →			← Time horizon →		
fostering a culture of integrity and transparency.								
A constructive and ethical corporate culture may strengthen the Bank's reputation, attract top talent, stimulate innovation and creativity and ultimately reinforce the institution's market position over the medium and long term.	Corporate culture	Opportunity		✓			✓	✓

In accordance with ESRS E1 requirements, the Bank classifies the identified material climate risks into physical risks and transition risks, as follows (E1.SBM-3\_01):

- The identified physical risks are associated with the direct manifestations of climate change, such as extreme weather events and natural hazards that may affect the operational capacity and financial performance of financed entities, as well as the exposure of the subsidiary's insurance products to increased claims ratios.
- The identified transition risks result from the economy's decarbonisation process and include the impact of emissions regulations, carbon pricing, technological changes, energy efficiency pressures and the potential depreciation of high-emission assets. These affect both the Bank's own operations (operational emissions, energy consumption) and the lending portfolio, particularly sectors with a high carbon footprint that are exposed to increased compliance costs, energy price volatility and the risk of stranded assets.

## Stakeholders' interest and views – SBM-2

Exim Banca Românească identified the main internal and external stakeholders involved in order to consult them and incorporate their views into the materiality assessment process, with the objective of obtaining additional insights regarding the related Impacts, Risks and Opportunities.

Exim stakeholders				
Considering the specific nature of financial institutions, the Bank's business model and its interactions with external parties, as well as the requirement to report sustainability aspects in accordance with ESRS standards, the following stakeholders were identified as relevant users of the sustainability statement or as affected stakeholders:				
Stakeholder	Type of stakeholder	Consultation method	Frequency	ESRS
Exim employees	Affected stakeholder	<p>Employee satisfaction surveys</p> <p>The Human Resources Division maintains continuous contact with employees throughout all human resources-related processes. Ensuring an adequate level of employee satisfaction regarding their professional activities, working environment, communication within teams and across departments, as well as other factors affecting employees, represents an ongoing priority for both the Human Resources Division and management.</p> <p>Ongoing performance and employee development discussions</p> <p>Meetings between employees / employee representatives and representatives of the Human Resources Division</p> <p>Meetings with employee representatives</p>	<p>Continuous</p> <p>Continuous</p> <p>Continuous</p> <p>Continuous</p> <p>Periodic</p>	E1, S1, G1
Exim shareholders	Affected stakeholder	<p>Establishment of clear sustainability objectives and increased transparency through the reporting of sustainability-related strategic objectives</p> <p>Documents provided: Activity Report, Sustainability Report, etc.</p> <p>Consultation within the double materiality assessment process</p>	Annual	S2

Stakeholder	Type of stakeholder	Consultation method	Frequency	ESRS
Clients – individuals and legal entities	Affected stakeholder	Discussions initiated with clients regarding sustainability aspects; ESG pre-screening questionnaires; requests for sustainability reports; consultation within the double materiality assessment process	Continuous	S4, G1, S2
Regulatory and/or public authorities (local and central)	Relevant users of the sustainability statement and affected stakeholder	Continuous contact and dialogue directly or through the Romanian Banking Association (meetings, events, seminars, etc.)	Continuous	E1, E2, E3, E4, E5, S1, S2, S3, S4, G1
Suppliers	Affected stakeholder	Dedicated meetings; discussions with the Bank's management; consultation within the double materiality assessment process	Continuous	G1, S2
Business partners	Affected stakeholder	Continuous contact and dialogue (periodic meetings); participation in corporate banking syndicated aimed at offering clients sustainable financial products such as loans and investments supporting environmentally friendly projects and initiatives	Continuous	E1, E2, E3, E4, E5, S1, S2, S3, S4, G1
Non-governmental organizations	Relevant users of the sustainability statement	Continuous contact and dialogue (periodic meetings, events, seminars, etc.)	Continuous	E1, E2, E3, E4, E5, S1, S2, S3, S4, G1
Industry associations	Affected stakeholder	Continuous contact and dialogue (periodic meetings, events, seminars, etc.)	Continuous	E1, E2, E3, E4, E5, S1, S2, S3, S4, G1
Media organizations	Relevant users of the sustainability statement	Continuous contact and dialogue; consultation within the double materiality assessment process	Continuous	E1, E2, E3, E4, E5, S1, S2, S3, S4, G1

Stakeholder engagement took place 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 for each stakeholder category were consulted and/or internal documentation related to feedback collected by Exim in the course of implementing day-to-day activities (employee surveys, customer surveys, supervisory reports, complaint reports from customers/employees, minutes of meetings with employee representatives, etc.) was considered.

The consultation method by stakeholder category, respectively through the involvement of internal stakeholders, was considered appropriate as it allows communication channels and consultation methodologies to be adapted to the needs and specific characteristics of each category. This ensured a more accurate, structured and relevant collection of feedback, facilitating a better understanding of and response to the concerns of each stakeholder group.

With regard to the timing of consultations, input collected in the previous year may still be relevant for the current year's assessment, as many of the identified issues and concerns remain valid over the medium and long term. In addition, previously collected feedback may provide a basis for comparison in assessing progress and changes in stakeholder perceptions and needs. This ensures continuity and consistency in the stakeholder engagement and assessment process.

### 7.1.3.2 Material impacts, risks and opportunities and their interaction with the strategy and business model – SBM-3

#### 7.1.3.2.1 Description of material Impacts, Risks and Opportunities

**Climate change** has been identified as material both from an impact perspective and from a risks and opportunities perspective, considering the current dependence of the portfolio on fossil fuels and the potential occurrence of extreme weather events that may disrupt social structures and key industries.

**Energy price volatility caused by climate change or other socio-economic factors** (conflicts, regulations) has a significant impact, as it may reduce the profitability of companies operating in energy-intensive sectors (wholesale trade, manufacturing), generating default risks that may ultimately affect the repayment of loans granted by the Bank.

#### 7.1.3.2.2 Current and anticipated effects of material IROs

##### **Climate change**

The Bank contributes to maintaining economic stability and governance frameworks that underpin social well-being, thereby having a positive impact on reducing vulnerabilities to the effects of climate change. The Bank may also contribute to climate adaptation solutions implemented by local public authorities through financing provided to entities in the public administration sector.

The sectoral structure of the Bank's corporate exposure forms the basis for analysing current climate-related risks and opportunities. It should be noted that during 2026 the Bank will further develop the methodology for identifying and monitoring physical and transition risks.

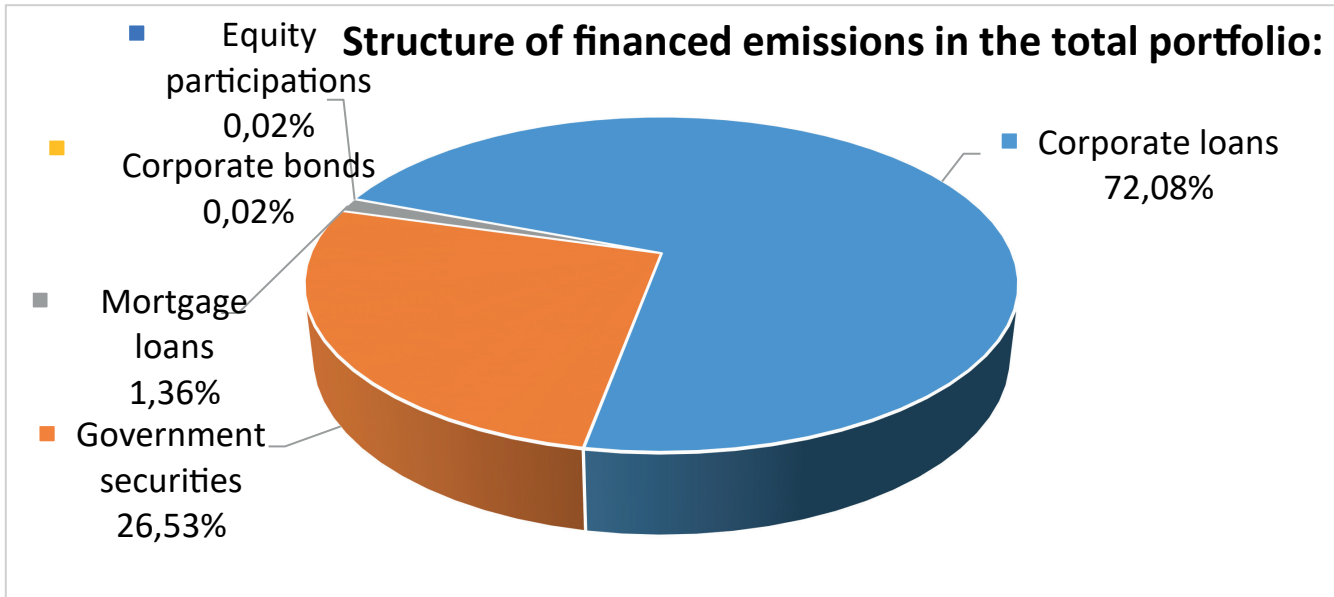
Thus, the financial exposures of Exim Banca Românească in the sub-sectors "Construction" and "Public administration activities" have a visible negative impact on climate change adaptation. In the construction sector, unsustainable practices may lead to soil degradation, disruption of ecosystems and reduction of natural resources, which, in turn, increases the risk of natural disasters by compromising the land's capacity to manage water.

By financing public administration activities, the Bank indirectly supports governance frameworks essential for the stability of society, but it may also contribute to the implementation of policies that do not prioritize climate change adaptation, putting at risk the efforts to protect local communities against the increasingly severe effects of climate change.

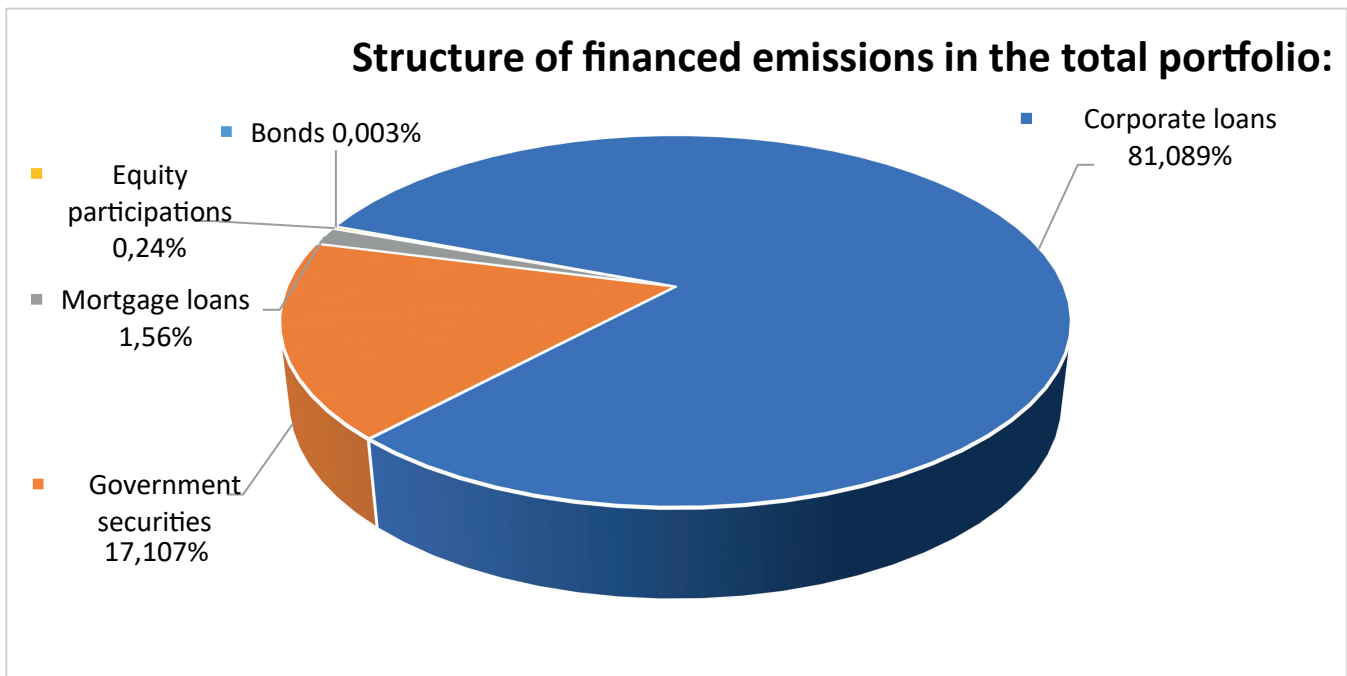
Financed emissions, namely the greenhouse gas emissions associated with the loans and investments provided, represent a significant aspect of the Bank's impact on the environment. In 2025, the financed greenhouse gas emissions were calculated for the second time. The applied methodology is based on the "PCAF Standard", the most widely used standard compatible with the GHG Protocol for calculating financed emissions.

Understanding and managing these emissions represent an integral part of the commitment to promote a low-carbon economy and sustainable practices across all sectors. The establishment of KPI targets regarding CO<sub>2</sub> emissions at the level of the financed portfolio represents a medium-term commitment (2026–2027).

The current structure of CO2 emissions is as follows:



2025



2024

Proactive adaptation to climate change represents for the Bank a strategic opportunity to capitalize on the transition to a low-carbon economy. Through investments in resilient infrastructure, diversification of renewable energy sources and the creation of innovative products and services adapted to the physical and transition risks of climate change, the company can achieve cost savings, stimulate innovation and gain a competitive advantage in an increasingly environmentally conscious market. The Bank may explore financial opportunities through investments in businesses that provide climate change adaptation solutions and through the financing of projects or activities that include climate resilience features, thus strengthening its position as a leader in sustainable finance.

The Bank's financial exposure to entities with high carbon dioxide emissions may have significant negative impacts on the environment, contributing to climate change. Financial support for sectors such as retail fuel trade, wholesale trade, manufacturing, construction and public administration amplifies greenhouse gas emissions due to their dependence on carbon-intensive processes and materials.

Moreover, by granting loans for properties that are not energy efficient and for vehicles dependent on fossil fuels, the Bank may exacerbate the effects of climate change and, implicitly, global warming. These practices contribute to increasing the Bank's carbon footprint and have harmful effects on the environment and public health, creating obstacles to climate change mitigation efforts and potentially affecting the Bank's reputation in the context of sustainable finance regulations.

For Exim Banca Românească, there is a significant number of financial opportunities arising from the potential (or current) financing of activities or entities that support decarbonization and the transition (i.e. climate change mitigation) to a more sustainable economy. Examples may include financing new carbon capture or storage projects or entities in the construction sector to support the development of electric vehicle charging infrastructure, or financing automotive manufacturers to stimulate design for resource efficiency.

Financing sustainable projects represents a financial opportunity, having the potential to lead to financial gains and increased market share and, given the growing focus on low-carbon technologies, this opportunity is highly likely to materialize.

Fluctuations in energy costs may affect the profitability of energy-intensive sectors, which may lead to default risks for companies financed by the Bank, particularly due to the high costs associated with adopting decarbonization technologies, such as electric tractors in agriculture.

Financing renewable energy projects may represent an opportunity for the Bank within its portfolio, enabling the production of CO<sub>2</sub>-neutral energy.

In conclusion, Exim is exposed to relevant risks through its exposure to the Construction, Wholesale trade and Manufacturing industries, which are subject to strict air pollution regulations. Companies in the Bank's portfolio within these sectors may incur significant operational and compliance costs, capital expenditures for emissions control and may face potential regulatory penalties due to emissions of hazardous air pollutants.

### **Business opportunities identified in 2025**

The Bank diversified its product portfolio and launched the Mastercard World EURO card, an instrument that improves the payment experience for individuals who travel or work abroad, offering premium advantages, benefits and rewards. Among the main benefits are free access, within a limit of 5 entries per year, to lounges in Romania and those within the Priority Pass network, with over 1.800 locations in airports worldwide. The card is issued under the Mastercard brand and is part of the Bank's strategy to provide secure banking products tailored to the needs of clients with international mobility.

At the same time, the Bank also introduced the Mastercard Standard START card, dedicated to children aged between 6 and 14, issued in their name. The product can be used by parents both to encourage children's financial independence and for responsible money management, having zero costs: no fees are charged for account administration, payments at merchants or ATM withdrawals. At the same time, the parent benefits from full control over spending, being able to monitor transactions and set customized limits for the child's card.

In 2025, Exim Banca Românească identified a series of commercial and operational development opportunities, aligned both with the growth strategy and with the objectives of sustainability and financial inclusion. These directions aim to consolidate the Bank's role as a systemic institution in supporting the entrepreneurial environment, through product diversification, increasing access to financing and encouraging the banking penetration of the Micro and SME segments.

#### **1. Development of the lending portfolio for Micro clients**

In order to promote financial inclusion and to facilitate rapid access of microenterprises to capital, the Bank diversified the portfolio of lending products dedicated to companies:

- Launch of the "Overdraft Micro" product – The introduction of this product allows microenterprises to benefit from additional tools for liquidity management, facilitating business continuity and reducing vulnerabilities to short-term shocks. At the same time, the product contributes to increasing the level of financial intermediation and to diversifying solutions adapted to the life cycle of very small companies.

- Implementation of the strategic partnership with the European Investment Fund (EIF) – This partnership opens access to dedicated European guarantees, allowing more advantageous financing conditions for entrepreneurs (reduced costs, lower collateral requirements).

## 2. Increase of the resource base through competitive transactional packages

On the liabilities side, the Bank leverages the upward trend in the number of newly established companies and the need of SMEs for simple, fast and predictable banking solutions.

- “Start-up” package (12 months free of charge) – Addressed to companies established in the last 24 months, this package contributes to accelerating banking penetration and supporting the early stages of business development. The 12-month free period represents an important competitive advantage, strengthening the relationship with new entrepreneurs and encouraging the use of digital services.
- SBB0 transactional package (45 lei/month) – This package offers an attractive pricing structure for micro companies and small and very small companies, reducing recurring operational costs. By simplifying access to essential banking services, the Bank stimulates customer loyalty and portfolio diversification over the medium term. The Bank also made available to SMEs and mid-cap companies a ceiling of 50 million euro for financing investment projects, under advantageous conditions, following a financing agreement concluded with the European Investment Bank. Through the imposed eligibility criteria (selection of sustainable and environmentally friendly activities), the Bank encourages the sustainable development of partner companies.

### **Opportunities and risks related to own activities**

The Bank’s continued use of vehicles powered by fossil fuels and the operation of energy-intensive physical assets, including buildings and data centres, involve CO<sub>2</sub> emissions. The company’s transition from fossil fuel vehicles to electric vehicles represents a direction for reducing these emissions. In addition, other positive impacts include the greening of the buildings in which Exim operates, as this 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 to adapt to climate change.

The energy mix (electricity, fuel and heating) used by Exim in its own operations generates CO<sub>2</sub> emissions. By implementing various initiatives to reduce energy consumption within the Bank’s premises, the Bank can reduce CO<sub>2</sub> emissions.

### **Own workforce**

Job security is important for the Bank, as it is an aspect that benefits both employees and the employer. When employees feel secure in their roles, they are more likely to be engaged, productive and loyal. Providing salaries based on fairness and benchmarked to the market is also fundamental to ensuring quality of life. Fair compensation supports the economic well-being of employees’ households.

The collective agreements implemented serve as a vital instrument for employees in protecting their rights and interests. Through collective bargaining, the Bank’s employees can obtain better salaries, benefits and working conditions. These agreements contribute to a more equitable workplace and can improve the Bank’s status as a socially responsible employer.

Additionally, by implementing comprehensive health and safety procedures, the Bank prevents workplace accidents and mitigates risks. These policies support the well-being of employees and customers, contributing to a safe and healthy working environment.

The Bank’s investment in employee training and development measures ensures the improvement of employees’ professional capabilities, 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 an approach of the Bank to promote a positive and sustainable organizational culture, which improves employee well-being and job satisfaction.

As a conclusion, in 2025 the Bank continued to position itself as a top employer in the banking market. By supporting a good work-life balance for employees, the Bank promoted a working environment that contributes to employee well-being and health, the increase in their productivity thus contributing to the Bank’s financial performance.

## Consumers and end-users

Security breaches or improper disclosure of personal or financial data, as well as cyberattacks, may negatively affect consumer trust in financial and/or digital services. Therefore, the Bank prioritizes the protection of personal and financial data, which, together with ensuring transparent communication, builds trust and loyalty among the Bank's clients. Strong information security policies ensure a high level of protection for personal data and contribute to preventing 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 improves financial education, fosters trust in the Bank as a financial institution and contributes to overall financial stability. The Bank also has a positive impact by facilitating universal access to financial products and services. This approach promotes financial inclusion, increasing economic opportunities for all individuals, reducing income inequality and stimulating sustainable economic growth.

Emerging financing models and the adoption of new technologies provide opportunities to deliver products and services in previously underserved markets and to generate additional sources of income. There may be an increasing number of opportunities to expand financial products and 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.

The proper assessment of suppliers and collaborators in line with social and sustainability standards represents another opportunity that can lead to improvements in societal well-being and environmental benefits. The application of clear codes of conduct and consistent payment procedures for suppliers and collaborators will generate and maintain ethical and transparent financial practices.

## Business conduct

In its operations, Exim has a positive impact on combating 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 strong corporate culture strengthens the Bank's reputation, attracting top talent, stimulating innovation and creativity and thus reinforcing the Bank's position in the market.

### 7.1.3.2.3 Current financial effects of material risks and opportunities

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

Unstable energy prices, due to climate change or other socio-economic factors (conflicts, regulations), may lead to a decrease in the profitability of enterprises operating in sectors that are energy-intensive (wholesale trade, manufacturing), which leads to an increased risk of non-repayment. Furthermore, technologies such as electric tractors, which represent decarbonization levers for the agricultural sector (also financed by Exim), are costly to adopt and represent risks for the financed entities. This may lead to increased capital expenditures and operating expenses, which may result in reduced profit margins for the financed sectors, which in turn may represent a business risk for Exim.

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

### 7.1.3.2.4 Anticipated financial effects of material risks and opportunities

The anticipated financial effects will be determined by the Bank after the implementation of stress tests and scenario analyses regarding financial risks and opportunities.

By monitoring risk, capital, solvency, liquidity indicators, etc., in accordance with the requirements of the National Bank of Romania, as well as through relationships with stakeholders, the Bank is able to develop a resilient business model.

#### 7.1.3.2.5 Resilience of the strategy and business model and the ability to address material impacts and risks and to capitalize on material opportunities

The Bank carried out the first double materiality assessment exercise for the purpose of this report for 2024.

Within the second iteration of the double materiality assessment exercise related to this report, a positive development identified was the origination of a portfolio of non-aligned green mortgage loans – out of total loans originated in Q4, 43% are loans with collateral with energy performance certificates class A.

#### 7.1.3.2.6 IRO subject to ESRS disclosure requirements

The material impacts, risks and opportunities identified in the DMA process were presented in section 7.1.3.1.4 regarding the result of the assessment of material impacts, risks and opportunities, including how these contribute to the strategy and business model.

### 7.1.4 Management of impacts, risks and opportunities

#### 7.1.4.1 Applied methodologies and assumptions

##### **Material assessment process**

The Bank 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 analysis tool for this purpose.

For the 2025 exercise, the Bank revised the double materiality analysis related to 2024, together with an external consultant.

#### 7.1.4.2 Process for identifying, assessing, prioritizing and monitoring impacts, risks and opportunities – IRO-1

The double materiality assessment (DMA) approach was based on three main phases, namely:

1. Understanding the context – In this stage, an overall analysis was performed of the activities, business relationships and operational model of the Bank and its subsidiary EximAsig, as well as of the internal and external context in which they operate. The analysis aimed to understand the operating framework and the relevant stakeholders, in order to identify any significant changes that could have influenced the results of the double materiality analysis carried out in the previous year. In addition to this assessment, consultations with relevant stakeholders were conducted for the context analysis, in order to collect their perspectives on the impacts, risks and opportunities associated with the activities of the Bank and EximAsig, as well as a peer benchmarking analysis to identify market trends and approaches used by similar institutions.

2. Identification and assessment of impacts, risks and opportunities – the purpose of this phase was to identify the IROs related to sustainability aspects relevant for the Bank and the subsidiary. The analysis started from the ESRS 1 AR 16 list, which constituted the starting point for the assessment of potential IROs.

Based on the information collected in the context understanding phase, the IROs applicable to the activities of the Bank and EximAsig were identified. These were subsequently analysed in order to determine their relevance, and the IROs identified in the previous year's double materiality exercise were reviewed and updated, where necessary, to reflect changes in the operational, market and regulatory context.

Impacts were 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, based on defined materiality thresholds, which was subsequently analysed at the level of internal experts for validation.

3. Validation of results – in this final phase, the double materiality analysis was validated by internal experts and the final result was approved at the level of the management body.

## **Impact identification process**

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

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

Considering the business model and the composition of the Exim Group, the main impacts are related to the Bank's portfolio (downstream value chain). In this regard, it was necessary to analyse and identify the main exposures of the Bank's portfolio across different sectors of activity in order to understand the key impacts associated with these sectors.

Taking into account the information on banking exposures, detailed at the level of section, division and CAEN code, materiality thresholds were established to determine the main exposures of the Bank's portfolio.

These thresholds (set at section level (10%), division level (8%) and class level (5%)) served as a filter to prioritise the areas presenting the most significant financial or operational risks, opportunities or impacts within the portfolio.

Once the main CAEN classes financed for non-retail exposures were established, the related impacts were identified using the UNEP Impact Radar methodology as a reference, which also provides an interoperability tool for alignment with ESRS, and these were subsequently mapped to the ESRS AR16 list of sustainability matters.

The impact of the retail value chain was also mapped using the UNEP Impact Radar methodology as a reference, based on the impact of NACE codes in the financial sector. For identifying impacts related to the upstream value chain and own operations, the results of the context analysis were used, as well as other reporting standards (i.e. GRI and SASB Standards).

## **Impact assessment**

For own operations, as well as for the upstream and downstream value chain, experts within the Bank assessed each impact using a scoring system from 0 to 5, impacts with a final score of 2.5 or higher being considered material, while those below this threshold were classified as informative or minimal.

The Severity assessment included the parameters of Scale, Scope and Irremediability, the materiality of actual negative impacts being determined exclusively based on Severity, while for potential negative impacts the final score resulted from combining Severity with Likelihood, with priority given to Severity in the case of potential human rights risks; for actual positive impacts, Severity was assessed based on Scale and Scope, while for potential positive impacts Likelihood was also included. In the assessment of Scale, for both positive and negative impacts, the results of the stakeholder engagement process were integrated.

For downstream negative impacts related to environmental topics - pollution, water resources, biodiversity and ecosystems, circular economy, the Bank used a methodology for assessing Scale and Scope based on environmental pressures from the ENCORE methodology and the level of concentration of exposures in the portfolio. A similar approach was applied for social topics – workers in the value chain and affected communities - where the assessment of Scale and Scope was based on social risk indicators and the classification of relevant exposures.

## **Process for identifying risks and opportunities**

For the identification of relevant risks and opportunities across the entire value chain (own operations and upstream, downstream operations - retail & non-retail), the information collected in phase 1 regarding the context analysis was used.

The process for identifying risks and opportunities was based on the analysis of the collected information and their mapping in accordance with the ESRS AR16 sustainability matters. The Bank mapped the sectors it finances to the relevant SASB standards (for example, the SASB Consumer Finance standard was used for the retail value chain, while the SASB Home Builders standard was used for risks and opportunities related to entities financed by the Bank in the residential and non-residential construction sector).

In accordance with ESRS 1, Application Requirement 15, the Bank will continue to deepen the financial materiality analysis by introducing both quantitative and qualitative analytical elements in future reporting exercises. For this reporting exercise, however, the Bank considered, in a qualitative manner, the following aspects, introducing information where applicable for each relevant risk and opportunity:

- Potential situations that, following the occurrence of future events, may affect the capacity to generate cash flows;
- Capitals that are not recognised as assets from an accounting and financial reporting perspective, but which have a significant influence on financial performance (intellectual capital, for example);
- Potential future events that could influence the evolution of these capitals.

### **Assessment of risks and opportunities – financial materiality**

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

The scale used for financial significance ranges from 0 to 3 (0 representing no impact and 3 representing extremely critical). The 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 threshold of 1,5 also ensures that risks and opportunities with marginal but visible impact (in the range 1,5-2) are considered, thus avoiding the risk of underestimating trends or significant changes that may affect the organization in the short or medium term.

In the process of assessing risks and opportunities, the results of the stakeholder consultation process were integrated for determining financial magnitude.

### **Material impacts, risks and opportunities**

In the upcoming period, the Bank aims to improve its internal framework regarding the assessment of financial effects of material risks and opportunities in lending activities, so that such effects are taken into account when setting capital targets and tolerance limits to manage potential effects on the Bank's profit and loss.

In this regard, starting with 2026, the Bank aims to improve the regulatory framework regarding the management of climate and environmental risks, in accordance with the provisions of the EBA Guidelines on ESG risk management.

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

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

#### **7.1.4.3 Decision-making process and related internal control procedures**

The executive management of Exim Banca Românească is responsible for ensuring the performance of the DMA and for ensuring the appropriate 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, and the Board of Directors approves the DMA results, as well as the corresponding changes to policies, strategies and the related business model where necessary.

Also, within the process of assessing financial materiality and impact, experts from the Bank's internal structures are involved for both assessments and stakeholders are consulted. The preliminary DMA result is validated at the level of the Bank's expert group, and the materiality limits established for determining materiality thresholds are validated by the risk management function.

#### 7.1.4.4 General risk management process, overall risk profile

The material impacts, risks and opportunities resulting from the DMA process are taken into consideration at the Bank level from the perspective of their implications on the business model, risk management strategy and internal governance framework.

The risk management strategy at the Bank level is designed to identify and manage significant risks across all internal structures. Its purpose is to ensure the alignment of capital adequacy requirements with the Bank's risk appetite, taking into account the risk structure of the activities carried out at different levels of the Bank.

The Bank determines the risk profile for each risk considered significant and has a risk appetite framework that takes into account all significant risks, including reputational ones, to which it is exposed.

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

Thus, the general risk management process, including the overall risk profile, is under review within a consulting program for the implementation of ESG requirements at the Bank level, taking into account the results of the double materiality analysis, certain specific regulatory requirements, as well as the results of the GAP analysis performed at the Bank level regarding ESG risk management. The program mainly targets the review of the following documents and/or processes:

- The strategy for managing significant risks, in order to ensure the inclusion of ESG risks within the risk appetite framework, the establishment of an internal monitoring framework through the implementation of specific indicators for monitoring climate risks, the setting of objectives, targets and limits to assess and mitigate climate, environmental and social risk;
- The existing risk management framework through the incorporation of climate risks, ensuring data collection, analyses and reporting on their exposures to climate and environmental risks, identification, assessment, monitoring, management and reporting of risks to facilitate decision-making at the level of management and relevant subcommittees, as well as the monitoring of loans from the perspective of these risks;
- The internal process for assessing the adequacy of capital and liquidity to risks, ensuring the inclusion of ESG risks, including climate and environmental risks;
- The development of stress scenarios, including ESG factors, to periodically assess the impact of climate and environmental risks on the entire loan portfolio;
- Policies/measures for reducing climate risks, ensuring the assessment of exposures in Brown sectors and the establishment of relevant indicators for measuring the portfolio exposure to physical risk and measuring the portfolio exposure to transition risk.

#### 7.1.4.5 List of ESRS disclosure requirements covered by the sustainability statement – IRO-2

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

Thus, we present below an index of the main reporting requirements and the section of the sustainability report in which they were addressed, structured in accordance with the requirements of the cross-cutting standards and the most important sustainability topics of the Group, namely E1, S1, S4 and G1.

<b>ESRS Standard</b>	<b>Disclosure requirement</b>	<b>Description of the requirement</b>	<b>Page</b>
ESRS 2	BP-1	General basis for the preparation of sustainability statements	37
	BP-2	Disclosures related to specific circumstances	38
	GOV-1	Role of the administrative, management and supervisory bodies	40

	GOV-2	Information provided to the administrative, management and supervisory bodies of the undertaking and sustainability matters addressed by them	44
	GOV-3	Integration of sustainability-related performance into incentive schemes	45
	GOV-4	Statement on the due diligence process	45
	GOV-5	Risk management and internal controls related to sustainability reporting	47
	SBM-1	Strategy, business model and value chain	47
	SBM-2	Interests and views of stakeholders	64
	SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	66
	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	73
	IRO-2	ESRS disclosure requirements covered by the undertaking's sustainability statement	76
ESRS E1	E1-1	Transition plan for climate change mitigation	88
	E1-2	Policies related to climate change mitigation and adaptation	90
	E1-3	Actions and resources related to climate change policies. Indicators and targets	88
	E1-4	Targets related to climate change mitigation and adaptation	88
	E1-5	Energy consumption and energy mix	92
	E1-6	Gross GHG emissions for scopes 1, 2, 3 and total GHG emissions	92
ESRS S1	S1-1	Policies related to own workforce	102, 103
	S1-2	Processes for engaging with own workers and workers' representatives regarding impacts	105, 101
	S1-3	Processes to remediate negative impacts and channels through which own workers can raise concerns	N/A
	S1-4	Taking action on material impacts on own workforce and approaches to mitigate material risks and pursue material opportunities related to own workforce, and the effectiveness of such actions	N/A
	S1-5	Targets related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities	N/A
	S1-6	Characteristics of the undertaking's employees	98

	S1-7	Characteristics of non-employee workers in the undertaking's own workforce	N/A
	S1-8	Collective bargaining coverage and social dialogue	101
	S1-9	Diversity indicators	105
	S1-10	Adequate wages	100,105
	S1-11	Social protection	105
	S1-12	Persons with disabilities	105
	S1-13	Training and skills development indicators	105,103
	S1-14	Health and safety indicators	102
	S1-15	Work-life balance indicators	101
	S1-16	Remuneration indicators (pay gap and total remuneration)	100,103
	S1-17	Incidents, complaints and severe human rights issues and incidents	N/A
ESRS S4	S4-1	Policies related to consumers and end-users	106
	S4-2	Processes for engaging with consumers and end-users regarding impacts	107
	S4-3	Processes to remediate negative impacts and channels through which consumers and end-users can raise concerns	107
	S4-4	Taking action on material impacts on consumers and end-users and approaches to manage material risks and pursue material opportunities related to consumers and end-users, and the effectiveness of such actions	112
	S4-5	Targets related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities	112
ESRS G1	G1-1	Corporate culture and policies on business conduct and corporate culture	112,116
	G1-2	Supplier relationship management	115
	G1-3	Prevention and detection of corruption and bribery	116,118
	G1-4	Confirmed cases of corruption or bribery	116
	G1-6	Payment practices	115

Furthermore, with regard to the requirement to present a table with all data points deriving from other EU legislative acts listed in Appendix B of ESRS 2, we note that the Bank was not subject to other legislative requirements from a sustainability reporting perspective. However, we note that starting with 2025, the Bank reports based on the ESG Pillar III transparency requirements.

#### 7.1.4.6 Policies adopted for the management of material sustainability matters – MDR-P

Exim Banca Românească acknowledges the importance of managing material sustainability matters in order to ensure a positive impact on the environment, society and economy, as well as to appropriately manage the related risks and capitalize on the associated opportunities. In this regard, a series of policies and practices have been adopted or updated in order to integrate sustainability principles into the Bank's activities, regulations which may be structured across the three directions – environmental, social and governance – as well as from the perspective of the value chain.

##### **Regulations addressing environmental impact:**

➤ **The Exim Banca Românească Sustainability Strategy** aims to ensure the appropriate framework for establishing objectives related to sustainable activity, as well as for their implementation and monitoring, being aligned with the sustainable development projects of the European Union. In this regard, specific objectives regarding the fundamental approach to sustainable development within Exim Banca Românească have been defined and strategic action measures have been established, in correlation with the business objectives.

The assumptions considered in establishing the Sustainability Strategy are the following:

- the need to comply with legislative requirements (reporting requirements under the EU Taxonomy and the Corporate Sustainability Reporting Directive CSRD 2464/2022, as well as recommendations of supervisory and regulatory authorities or other specialized authorities or bodies);
- the integration of the Sustainability Strategy into the Bank's business strategy, as well as into the significant risk management strategy;
- the implementation of the double materiality principle – financial materiality (the potential positive or negative impact that sustainability matters could have on the Bank's financial performance) and environmental and social materiality (the impact that the Bank's operations could have on the environment and society);
- the impact of sustainability principles and ESG factors on the internal regulatory framework regarding financial and non-financial reporting, reputation and business model, products and services, risk management, governance, value chain, etc.;
- capitalizing on opportunities and supporting national programmes through the redirection of financial flows towards the sustainable economy;
- the strategic sustainability objectives achieved to date.

The objectives of the 2026-2028 Sustainability Strategy are focused on the three pillars: environmental, social and governance.

➤ **The Regulation regarding the implementation of sustainability requirements** aims to ensure the appropriate framework for implementing the Bank's Sustainability Strategy and monitoring the achievement of the assumed objectives, the measures established within the sustainability action plans, as well as the specific regulatory requirements. At the same time, the Regulation also establishes general responsibilities regarding certain processes related to reporting requirements at the level of the Bank's structures, focusing on conducting business in a responsible and efficient manner aligned with the European Union's sustainable development objectives, as well as national sustainable development strategies and plans.

The Regulation regarding the implementation of sustainability requirements aims to achieve the following objectives:

- the implementation of an integrated governance concept at Bank level regarding the implementation of sustainability requirements;
- the consistent transposition of legal and/or regulatory requirements into the Bank's internal regulatory framework;
- the establishment of an internal interdepartmental collaboration framework in order to increase the efficiency of the use of resources and expertise existing within the organization, as well as the allocation of responsibilities regarding the implementation of sustainability requirements at the level of its entities.

➤ **The Sustainable Financing Framework Regulation** was developed with the purpose of enabling the development of the Bank's green loan portfolio regarding the implementation of ESG concepts, the main aspects included therein being:

- Defining the principles and objectives of sustainable financing, in line with the European Green Deal, the Paris Agreement and the Sustainable Development Goals.
- Establishing the eligibility criteria applicable to Green Loans, both for the corporate segment and the retail segment.
- Classifying Green Loans according to the degree of alignment with EU Taxonomy requirements into: EU Taxonomy Green Loan and Non-EU Taxonomy Green Loan.
- Categories of benefits that may be granted to clients accessing Green Loans (e.g. cost reductions, support in establishing eligibility for a Green Loan).
- Activities excluded from the Green Loan category (e.g. mining sector, oil sector, electricity production with emissions above the standard, hazardous waste management).
- Aspects regarding Green Loan reporting.

The policies adopted for managing material sustainability matters related to the financing, guarantee and insurance activities carried out by Exim Banca Românească in the name and on behalf of the state are presented in subchapter 7.5, MDR-P NCS.

#### **Regulations addressing social impact:**

For the NCS segment, the policies regarding the management of environmental impact and social impact for officially supported export credits are detailed in subchapter 7.5, within the sustainable development policy, MDR-P NCS.

The Bank's social policies have transversal applicability and uniformly cover all Exim Banca Românească personnel; personnel within the division managing the activity carried out in the name and on behalf of the state are not subject to a distinct regime, but are included within the overall body of employees to whom the internal social regulations apply:

*The Exim Banca Românească Staff Code of Ethics* – expresses the values, ethical and corporate principles promoted within Exim Banca Românească. The Code of Ethics promotes a culture of integrity by pursuing an example of professional ethics and supports the formation and implementation of ethical values, responsible behaviours and actions within Exim Banca Românească.

*The Policy regarding the promotion of diversity management within Exim Banca Românească* – provides for addressing differences and capitalizing on them, with the purpose of obtaining positive results both at individual level and at team and organizational level. Diversity principles are reflected transversally within the Bank in internal regulations such as the Collective Labour Agreement, Internal Regulation, etc. and in internal processes, such as staffing and social dialogue, these being carried out at the level of the Directorates with assigned responsibilities.

*The Policy regarding the management of conflicts of interest within the Bank* - establishes the manner of managing conflicts of interest through the identification, assessment, management and reduction/mitigation or prevention of potential and actual conflicts of interest both at institutional level and with regard to the individual interests of employees, including members of the management body, which could negatively influence the fulfilment of their duties and responsibilities. The Policy aims to strengthen the framework related to the Bank's internal control through:

- ✓ identifying the areas (relationships, services, activities, transactions) where conflicts of interest may arise;
- ✓ identifying conflicts of interest of personnel, including those of members of the Bank's management body, as well as persons holding key functions, establishing measures and procedures to prevent or manage conflicts of interest;
- ✓ assigning roles and responsibilities for the implementation of this policy;
- ✓ ensuring compliance with the legislative framework and national and European regulations.

The Regulation regarding the implementation of sustainability requirements - the Bank, as a personal data operator, establishes the processing rules, *the standards to be followed in processing activities, as well as the fundamental principles governing the processing of personal data.*

Through the *Data Protection Officer*, acting within the internal regulatory framework reflected mainly by the Policy and the internal regulations subsequent thereto, Exim Banca Românească continuously monitors compliance with the applicable legislation at the level of processing activities carried out directly by Exim Banca Românească (independently or together with other operators, through common means and purposes) or indirectly, through persons empowered by Exim Banca Românească.

The *Information Security Policy* - presents the principles and responsibilities relating to IT systems and also regulates the Bank's approach regarding information security management, IT systems, ensuring the confidentiality, integrity and availability of the data and information operated by Exim Banca Românească. The main objectives of the Policy are:

- ✓ ensuring a safe working environment for all Bank employees and authorized users;
- ✓ training personnel and ensuring that all employees know and comply with the Policy, understand their responsibilities regarding the protection of the confidentiality and integrity of data and the IT system used;
- ✓ minimizing to a tolerable level interruptions to activity caused by incidents or breakdowns;
- ✓ ensuring the necessary capacity to continue strategic activities in the event of major incidents, especially services provided to clients;
- ✓ developing and maintaining the necessary response capacity in emergency situations;
- ✓ protecting the Bank's image.

#### **Regulations addressing the governance framework:**

*The Regulation on the Organization and Functioning of Exim Banca Românească and the Policy regarding the activity management framework within Exim Banca Românească* include the responsibilities of the Board of Directors and of the advisory committees for the purpose of supervising the implementation of ESG principles aligned with the **Sustainability Strategy**.

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

The Management Committee, as the senior management body, is responsible for implementing the applicable strategy, objectives and policies intended to ensure compliance with banking legislation and regulations, as well as for implementing the strategic sustainability objectives and aligning the Bank with sustainability requirements.

*The Exim Banca Românească Strategy and business model* establish the **strategic objectives and principles of Exim Banca Românească**, regarding sustainable development, among which we mention:

- Supporting priority projects, objectives of national interest, the development of infrastructure and public utility services, including capitalizing on opportunities and supporting national programmes through redirecting financial flows towards the sustainable economy.
- Supporting regional development and the sustainable development of the local economy, as well as climate-purpose financing, resulting in the increase of green financing (with climate purpose) or financing with social objectives.
- Supporting the development and increase of SME competitiveness.

*The Strategy regarding the management of significant risks* establishes:

1. responsible lending principles, by encouraging those projects and activities having a favourable impact on the environment or society in general, and by taking into consideration, within the process of analysing financing requests, the debtor's exposure to environmental, social and governance factors (hereinafter referred to as ESG factors);
2. processes for identifying debtors exposed to high risks associated with ESG factors and for conducting more in-depth analyses of the business model of such debtors, including through the identification and analysis of mitigation measures for these risks.

The implementation of the *Anti-Corruption Strategy* presumes that all employees and members of the management body of Exim Banca Românească or EximAsig, as well as all persons and entities entering into business relationships with Exim Banca Românească or its subsidiaries (clients, suppliers, agents, etc.) know, understand and comply with the commitment regarding the prevention and combating of corruption acts and will conduct themselves in accordance with ethical standards, applicable legislation and contracts applicable to the parties.

**Exim Banca Românească**, signatory of the declaration regarding the assumption of the organizational integrity agenda in the context of the National Anti-Corruption Strategy 2021-2025, carries out its activity within a transparent and consistent internal control environment, which ensures the identification, assessment, monitoring and mitigation of the risks to which it is exposed in the course of its activity, in order to achieve its long-term objectives.

In this regard, Exim Banca Românească:

- Adheres to the fundamental values and supports the principles and objectives of the National Anti-Corruption Strategy;
- Assumes the implementation of the specific measures falling under the exclusive competence of Exim Banca Românească;
- Adopts all necessary measures in order to avoid conflict of interest and incompatibility situations, as well as to consider the public interest above any other interest, in compliance with the principle of transparency of the decision-making process and unrestricted access to information of public interest;
- Supports and promotes the implementation of the anti-corruption legislative framework.

#### **Internal regulations grouped from the “value chain” perspective**

*The Corporate Client Lending Policy* provides for the gradual implementation of the sustainable lending concept within the lending activity carried out by the Bank. By applying the *sustainable lending concept*, the Bank will ensure that the financing granted will consider, during the analysis process, sustainability factors and environmental, social and governance factors.

*The General Procedure regarding the Internal/External Warning Channel (“Whistleblowing”) within Exim Banca Românească* - establishes the appropriate measures for implementing an internal or, as applicable, external warning mechanism – “whistleblowing” – to be used within Exim Banca Românească in order to draw attention to actual or potential breaches of regulatory requirements or internal requirements, grants each employee, member of the Bank’s management body or persons carrying out internship/documentation activities the possibility to submit notifications, including anonymous notifications, in the event of identifying alleged breaches of internal/legal provisions, ethical codes, or inconsistencies, for the purpose of applying the appropriate measures.

*The Policy regarding the management of customer complaints/requests* establishes 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 carrying out 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 the relationship with its clients, provide the highest quality services and respond to their needs.

Sustainability requirements are reflected in several areas of the Bank’s activity 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 matters are reflected both in the regulations governing the Bank’s own-name and own-account activity and in those governing the activity carried out in the name and 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.

Through the *Corporate Client Lending Policy*, the *Credit Risk Policy in the retail lending activity of Exim Banca Românească*, the *Know Your Customer (KYC) Procedure*, as well as the *Strategy regarding the management of significant risks*, Exim Banca Românească approved the types of clientele (establishing the acceptance principles applicable thereto, specifying at least the categories of clients that the Bank intends to attract, as well as the maximum level of risk considered acceptable by the Bank at the level of clients, products and services), the types of properties that cannot be financed, lending restrictions, concentration limits by geographic regions based on socio-economic disparity scores, credit exposure limits by country, the Bank identifying and limiting risk concentrations according to the associated risks.

At the same time, according to the *Strategy regarding the management of significant risks*, the Bank assesses client exposures to ESG factors, especially environmental factors and climate change impact, as well as the adequacy of mitigation strategies and establishes restrictions regarding the granting and renewal of certain credit facilities for “Construction” and “Hotels and restaurants” activities for certain client segments related to own-name and own-account activity.

Exim Banca Românească encourages companies requesting financing, guarantee and insurance products in the name and on behalf of the state to include sustainability within their business strategy, integrate sustainability-related risks,

consider adverse sustainability impacts and sustainable investment objectives or the promotion of environmental or social characteristics within the business decision-making process, encouraging companies to comply with good governance practices and guarantee the precautionary principle of “do no significant harm”, so that neither the environmental nor the social objective is significantly harmed.

***The highest decision-making body within Exim Banca Românească responsible for approving policies and strategies, including those incorporating sustainability-related matters, is the Board of Directors, having the following sustainability-specific responsibilities established within the Regulation on the Organization and Functioning of Exim Banca Românească:***

- establishes and approves the Bank’s Sustainability Strategy for a horizon of at least 3 years, through which objectives are established regarding the three dimensions Environment, Social and Governance, in close correlation with the Exim Banca Românească Strategy and business model.
- approves the Exim Banca Românească business model, pursuing the achievement of a sustainable business model with sustainable objectives related both to the development of the organization itself and to supporting its clients’ investment projects.
- supervises the implementation of strategic sustainability objectives and decides on their prioritization.
- together with its support committees, has responsibilities in creating a strategic and procedural framework for managing the impact on the economy, environment and society, including on human rights.
- monitors the ensuring of a reasonable level of compliance regarding the implementation of sustainability requirements and prepares the Sustainability Report as an integral part of the Annual Report of the Administrators, reflecting the Bank’s ESG commitments and performance.

The Management Committee represents the senior management body responsible for the appropriate implementation of the strategic sustainability objectives and the alignment of the Bank with the sustainability requirements established by the Board of Directors, intended to ensure compliance with banking legislation and regulations.

Exim Banca Românească understands the importance of sustainability by focusing on conducting business in a responsible and efficient manner aligned with the European Union’s sustainable development objectives, as well as national sustainable development strategies and plans.

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

## **7.2 Environmental information**

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

#### **7.2.1.1 Applicable regulatory framework**

In order to ensure compliance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), the Sustainability Report includes a section dedicated to the regulatory framework applicable to reporting under the EU Taxonomy. This section details both the relevant European legislation and the manner in which it has been transposed into national legislation, including the orders issued by the National Bank of Romania (NBR).

#### **1. Relevant European legislation:**

- Directive (EU) 2025/794 of the European Parliament and of the Council amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements has considerably narrowed the scope of application;
- Directive (EU) 2022/2464 regarding corporate sustainability reporting (CSRD) - This Directive extends non-financial reporting requirements, requiring large and listed companies to disclose detailed information regarding the impact of their activities on environmental, social and governance matters;
- 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;

- Commission Delegated Regulation (EU) 2026/73 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of the information to be disclosed concerning environmentally sustainable activities and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards the simplification of certain technical screening criteria for determining whether economic activities cause no significant harm to environmental objectives.

#### **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, establishing the 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 the reporting requirements for financial institutions.

#### **4. Reporting requirements under the EU Taxonomy:**

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

#### **5. Implementation and compliance:**

- Reporting process: The Bank has implemented internal procedures and processes for the collection and verification of the data required for taxonomy reporting.
- Ensuring compliance: The Bank has implemented specific control mechanisms in order to ensure the accuracy and compliance of the reported information.

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

#### **7.2.1.2 Methodology and limitations**

The Green Asset Ratio (“GAR”) is the benchmark indicator for taxonomy alignment reporting. It indicates the proportion of the Bank’s assets financing and invested in taxonomy-aligned economic activities, expressed as a percentage of total covered assets. However, the GAR has limited informative value, being established strictly within Delegated Regulation (EU) 2021/2178.

#### **Methodological changes**

In accordance with **Commission Delegated Regulation (EU) 2026/73**, amending **Regulations (EU) 2021/2178, 2021/2139 and 2023/2486** to simplify both the content and presentation of information regarding sustainable activities, the Bank implemented the following measures: (i) postponed the reporting of information related to the “Fees and Commissions” indicator (Template 6) until 2028, (ii) eliminated the template dedicated to nuclear energy following the simplification of the technical screening criteria, and (iii) continues to use the templates established under Delegated Regulation (EU) 2021/2178, in the form prior to the amendments introduced by Delegated Regulation (EU) **2026/73**, during the transitional period.

#### **Presentation of the calculation methodology**

The calculation of the green asset ratio (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 foreclosed collateral:

- Financial assets at amortized 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 non-trading financial assets mandatorily measured at fair value through profit or loss;
- Real estate collateral obtained by credit institutions through repossession in exchange for debt cancellation.

Exposures represent gross carrying amounts, not reduced by impairment adjustments, according to information from financial reporting for prudential supervisory 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 Article 19a or 29a of Directive 2013/34/EU, financial assets held for trading, on-demand interbank loans and derivative financial instruments are excluded from the numerator of the indicator.

### ***Retail business line***

Exposures to households include only the mortgage loan portfolio. As mortgage loans relate to real estate activities (residential), we consider all mortgage exposures as eligible for the climate change mitigation (CCM) activity as they fall under Section 7.7 of the Climate Delegated Act (Acquisition and ownership of buildings).

The collection of exposures related to building renovation loans and car loans is not carried out separately, as they form part of consumer loans. Currently, the Bank does not collect information allowing classification within these categories.

Considering that there is no centralized data available at national level **for all technically assessed buildings** regarding Energy Performance Certificates (EPCs), for the purpose of analyzing taxonomy alignment of exposures, the portfolio of standard mortgage loans granted during 2022-2025 and the entire Prima Casă/Noua Casă loan portfolio were considered, where the Bank had the necessary information available.

For the purpose of determining Taxonomy alignment, the Bank analyzed, through the implementation of a methodology, the above-mentioned portfolio and considered aligned only the loans financing buildings constructed before 2021, with energy class A and complying with the DNSH criterion under Delegated Act (EU) 2021/2139 (“do-no-significant-harm” / “do not significantly harm”) - determined based on a specific physical risk analysis. The MSS criterion (“Minimum Social Safeguards”) was not included in the Taxonomy alignment analysis for the Retail/Households area, in accordance with the latest European Commission report regarding MSS. Loans financing buildings constructed starting with 2021 were considered non-aligned because compliance with the primary energy demand (PED) alignment condition could not be determined in accordance with the requirements of the Delegated Regulation.

### ***Corporate business line***

Exposure within the corporate area is collected from the internal database at the level of each entity type and each product category, for entities that, in the reporting reference year, report under the CSRD.

The exposures considered in the numerator are exposures to 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 NBR Order 1/2024.

For general-purpose financing granted to counterparties subject to sustainability reporting requirements, the key performance indicators regarding turnover and capital expenditure reported by these entities are used. For this assessment, there is no public database that counterparties are mandatorily required to use for reporting non-financial information. Therefore, the Bank uses information obtained bilaterally from counterparties or public information regarding them from annual reports. Since the majority of non-financial entities have not yet published their reports for 2025, reporting regarding eligibility and alignment for these entities is based on the data published for 2024.

Where the use of proceeds is known, financial institutions must assess whether the information provided by their counterparties regarding the alignment of economic activities with the taxonomy provides sufficient evidence of compliance with the relevant individual Technical Screening Criteria (TSC). Given the limitations related to the documentation of financed projects regarding compliance with these technical screening criteria, the Bank did not classify financing based on such an assessment in 2025.

Where no information was available, the Bank considered that 0% of the counterparty’s turnover/CapEx was taxonomy-eligible/aligned.

### ***Local Public Authorities financing***

The collection of exposures, where the use of proceeds is known, was carried out from the internal database. According to the clarifications issued by the European Commission regarding exposure related to financing granted to local administrations, cases where the 'use of proceeds' (UoP) was unknown were reported under the category Central governments and supranational issuers, i.e. outside the GAR calculation.

The Bank does not have a business model that also includes public housing financing; therefore, the Bank does not record eligible exposures arising from loans granted to municipalities financing public housing.

At this stage, the collection of data regarding eligibility and alignment for the financing of activities and assets other than public housing granted to local administrations cannot be carried out because the purpose of the loan specified in the terms of reference is, in most cases, under the category "multiple purpose". Even where the purpose of the loan is "co-financing of European funds", there is a continuous dynamic in the use/financing ceiling ratio generated by the appearance of new credit purposes or amendments to the existing ones.

Also, where the SC (substantial contribution) and DNSH conditions within European funds financing programmes are not fully aligned with the Taxonomy requirements, these are considered fulfilled, including from a Greenwashing perspective.

### ***Collateral obtained through repossession***

For collateral obtained through repossession of residential real estate, the same mechanism for determining eligibility and alignment as in the case of exposures to households was used.

For non-residential collateral, alignment was not identified.

### ***Off-balance-sheet exposures***

For off-balance-sheet exposures, the Bank provides data only for financial guarantees securing loans and receivables and other debt instruments issued to undertakings, as it does not hold assets under management.

With regard to guarantees, depending on the source of exposure, for example in the case of corporations falling under the CSRD scope, data regarding eligibility and alignment were collected following the process described in the lending procedure. The eligibility and alignment percentage declared by the entity reporting under the CSRD was applied to the exposure related to the issued guarantee.

Letters of bank guarantee issued individually and fully secured with cash collateral or letters of bank guarantee issued under non-cash/multi-product ceilings fully secured with cash collateral inherit the client's eligibility and alignment in the case of clients that also record other exposures (except for exposures arising from investment loans), while in the case of clients with no other recorded exposure, these are considered non-eligible.

#### **7.2.1.3 Disclosure requirements**

In accordance with the provisions of the above-mentioned regulatory framework, for 2025 the Bank is required to disclose the 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, Exim Banca Românească records the following values of the key performance indicators for credit institutions under Article 8 of the EU Taxonomy Regulation for 2025:

0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation

Reference date for disclosure 31.12.2025		Total environmentally sustainable assets (RON million)	KPI ****	KPI *****	% coverage (of total assets) ***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]:	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]:
Main KPI	Green Asset Ratio (GAR)	493	2,82%	1,83%	58,4%	35,0%	41,6%

Reference date for disclosure 31.12.2025		Total environmentally sustainable assets (RON million)	KPI ****	KPI *****	% coverage (of total assets) ***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]:	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]:
Additional KPI	GAR (flow)	286	1,29%	1,52%	64,0%	22,4%	36,0%
	Trading portfolio*						
	Financial guarantees	-	-	-			
	Assets under management						
	Fees and commissions income**						

Reference date for disclosure 31.12.2024		Total environmentally sustainable assets (RON million)	KPI ****	KPI *****	% coverage (of total assets) ***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]:	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]:
Main KPI	Green Asset Ratio (GAR)	127	0,73%	0,68%	63,3%	37,7%	36,7%

Reference date for disclosure 31.12.2024		Total environmentally sustainable assets (RON million)	KPI	KPI	% coverage (of total assets) ***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]:	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]:
Additional KPI	GAR (flow)	22	0,21%	0,25%	51,7%	27,2%	48,3%
	Trading portfolio*						
	Financial guarantees	-	-	-			
	Assets under management						
	Fees and commissions income**						

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

\*\* Fees and commissions income arising from services other than lending and asset management.

\*\*\*% of assets covered by the KPI within Banks' total assets.

\*\*\*\* Based on the counterparty turnover KPI.

\*\*\*\*\*Based on the counterparty CapEx KPI, except for lending activities where, for general-purpose lending activities, the turnover KPI is used.

The detailed reporting templates related to the key performance indicators (KPIs), prepared in accordance with the requirements of Article 8 of Regulation (EU) 2020/852 regarding the EU Taxonomy and the applicable delegated acts, are presented in the **Annex – Standardised reporting templates regarding EU Taxonomy alignment**.

During the current period, the Bank corrected errors related to the comparative period ended 31 December 2024. These corrections do not affect Template 0 presented above nor the value of the Green Asset Ratio. The following values related to the comparative period were restated: Template 1 (based on Turnover/based on CapEx): on rows 1, 24, 25 and 48 in the Transition activities column (Climate change mitigation and Total), row 25 in the total gross carrying amount column; Template 3 (based on Turnover/based on CapEx): on rows 20 and 21 in the Share of total covered assets financing taxonomy-relevant sectors column (Climate change mitigation and Total), row 24 - in the Transition activities column (Climate change mitigation and Total), row 25 - all columns (Climate change mitigation and Total) and row 32 in the Transition activities column (Climate change mitigation and Total); Template 4 (based on Turnover/based on CapEx): row 20 and 21 in the Share of total covered assets financing taxonomy-relevant sectors column (Climate change mitigation and Total) and rows 24, 25 - in the Transition activities column (Climate change mitigation and Total); Annex XII.

In the current year, an increase in the Green Asset Ratio is observed from 0,73% to 2,82% based on turnover (+2,09 pp) and from 0,68% to 1,83% based on CapEx (+1,15 pp), driven by the increase in exposures to non-financial undertakings subject to NFRD reporting requirements and which published EU Taxonomy information as at 31 December 2024. Thus, compared to the previous period, the percentage of aligned exposures for non-financial undertakings with unknown use of proceeds subject to Art. 19(a) or 29(a) under Directive 2013/34/EU represents 57% based on turnover compared to less than 1% as at 31 December 2024.

## 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, considering a series of measures aimed at reducing the environmental impact of both its portfolio and own operations. Thus, the Bank is currently undergoing a detailed assessment of its carbon footprint and of the exposure of its loan portfolio to climate-related risks, in accordance with the requirements of ESRS E1-1. Although formal decarbonization plans are 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 stage, the Bank does not yet have a formal transition plan.

Within this process, the following stages have been completed or are ongoing:

- Completion of the inventory of direct and indirect emissions (Scope 1, 2 and partially Scope 3); - completed
- Assessment of the loan portfolio exposure to carbon-intensive sectors; - completed
- Establishment of a governance framework for the approval and implementation of the decarbonization plan. – nearing completion

In this context, we note that the Bank currently does not have approved emission reduction targets aligned with the Paris Agreement to be reported under ESRS E1-4, but it intends to finalize the development and approval of the decarbonization plan during 2026-2027, including intermediate and long-term objectives, as well as specific measures for achieving them. Following the implementation of the decarbonization plan, emission reduction objectives and targets will be established and specific policies will be developed in this regard.

In the meantime, a series of objectives have been established and certain operational measures have been initiated to reduce the carbon footprint of own operations, and a preliminary assessment of the portfolio exposure to climate risks has been performed, as detailed in the following sections of this report.

The institutional dimension of the Bank and the structural particularities of the asset portfolio constitute determining factors in designing a viable climate transition pathway. The diversity of financed economic sectors, the degree of exposure to carbon-intensive industries and the geographical concentration of lending operations represent essential variables requiring in-depth analysis prior to the formulation of quantitative objectives.

For the methodology used in calculating financed emissions, the Bank relied on Standard A - Financed Emissions under the Global GHG Accounting and Reporting Standard for the Financial Industry issued by the Partnership for Carbon Accounting Financials (PCAF), 2022 version. The inaugural initiative (performed in 2024) regarding the calculation of the carbon footprint of financing activities represented a first fundamental step in establishing an empirical baseline. The 2025 iteration of this calculation creates the first time series of financed emissions data, which constitutes the basis for the process of defining reduction pathways.

The Bank is aware of the critical importance of substantiating decarbonization objectives on robust historical data enabling trend identification 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.

The institution undertakes to continue strengthening the GHG emissions database, refining analytical methodologies and developing, within the horizon of the next financial year, a scientifically substantiated transition plan. In parallel, the implementation of operational energy efficiency measures and the development of internal capabilities for climate risk assessment continue, thus preparing the organizational infrastructure necessary for an efficient transition towards a low-carbon economy.

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

Within the double materiality assessment (DMA) process, the Bank identified a series of material matters related to climate change, including the related impacts, risks and opportunities. Thus, during the upcoming period, for each significant climate-related risk identified, the Bank will assess the category under which it may be classified, respectively whether the risk is a climate-related physical risk or a climate-related transition risk. Details regarding material climate-related matters were presented in Chapter 7.1.6.

Also, the Bank is currently implementing a consultancy programme carried out in collaboration with E&Y, through which climate and environmental risks will be integrated into the internal regulatory framework regarding risk management, including within the internal ICAAP and ILAAP processes.

The result of this exercise, as well as of the stress tests to be considered, was finalized in February 2026, and the implementation of the new instruments during 2026 will contribute to adapting the strategy regarding the management of significant risks and, implicitly, the Bank's strategy and business model.

In parallel with the development of the transition plan, the Bank is strengthening its institutional capacity to identify and assess climate-related risks and opportunities (IRO 1). At this stage, the related methodological framework is under development and will be formalized once the transition plan is approved. Therefore, certain ESRS E1 requirements cannot currently be fully met within this report and will be gradually covered no later than the reporting for 2028.

The identification of transition events, the assessment of exposures and the analysis of climate scenarios compatible with 1,5°C — including the identification of assets potentially misaligned with a climate-neutral economy — are not fully presented within this report, as they depend on the existence of a formalized transition plan. (E1.IRO 1\_10–14)

The assessment of asset exposure to physical hazards is at an early stage. The current analysis does not yet use high-emission scenarios (SSP5 8.5, NGFS “Hot House World”) and does not integrate geospatial data at NUTS level, as required by ESRS. The Bank intends to develop this analytical capability, including through the integration of physical risk into the ICAAP methodology. (E1.IRO 1\_06, 07)

The formal definition of short/medium/long-term horizons and the process for systematic identification of GHG emission sources within operations and the value chain are currently being structured. These elements will be integrated within the ESG framework and aligned with ICAAP planning. (E1.IRO 1\_01, 05)

### 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 the negative impact increasing globally, both within society and the economy. Climate change manifests through the increasing frequency and severity of extreme weather events and requires behavioural change in order to stimulate climate change mitigation and/or adaptation.

Financial institutions will play an essential role in financing the transition towards a sustainable, low-carbon economy by increasing the share of green financing within the loan portfolio.

The Bank acknowledges that its activity may have a significant effect on each sustainability pillar, respectively in the economic field, within society and within the environment. Thus, the Bank's objective is to conduct profitable long-term business while avoiding, among others, social and environmental harm, through the application of appropriate due diligence practices (see chapter GOV-4: Statement on due diligence).

Also, the Bank is undergoing a continuous process of improving environmental protection processes and social standards, including our involvement in sensitive business sectors.

Through its lending policies, the Bank indirectly contributes to generating environmental impact, being aware of this aspect and therefore implementing proactive measures to mitigate the generated impact.

At the same time, the Bank closely monitors financed emissions so that decisions may be taken which contribute to their reduction, ultimately supporting the transition of the Romanian economy towards a sustainable economy and creating the premises for understanding, development and acceleration towards the European "Net zero" target.

In order to support its clients in improving their carbon footprint and achieving their sustainable transformation, the Bank will need to assess in detail significant-value transactions and projects based on ESG criteria and advise its clients accordingly.

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

Awareness actions among clients regarding climate and environmental risks, including actions intended to support or accelerate transition plans, will be carried out by the Bank throughout the entire duration of the plan. The inclusion of messages presenting sustainability actions within communication plans represents a constant priority for the Bank.

Throughout 2026, the Bank will develop a framework for the detailed identification and management of ESG risks and of the measures required to mitigate them (for transactions and projects significant in value).

**The digitalization of internal processes** also represents a strategic component aimed at increasing the efficiency of processes and flows, increasing customer satisfaction and financial inclusion.

An important stage of the digitalization process aims to ensure a level of digital maturity of data in order to enable innovation and subsequent digital implementations. This stage includes the development of digital products while maintaining alignment with the Bank's strategy and business model, strengthening core applications, developing a new data platform and no code/low-code solutions, as well as the transition to cloud.

Within the above context, the development of digital flow and content management solutions (Business Process Management, Enterprise Content Management) represents an important measure for reducing emissions. The implementation of new digital solutions and the improvement of existing ones such as: Internet/Mobile Banking, a digital onboarding platform, Contact Center digital branch, in order to ensure a unified omniaccess experience, are projects currently under development. Additionally, the development of the payments and transactions services area, by providing new functionalities to customers within the ATM network and increasing payment accessibility at POS terminals, represents another measure supporting digitalization.

#### **Energy**

Combating climate change involves concerted efforts at global level, requiring increased energy efficiency, transition towards renewable energy sources, minimization of greenhouse gas emissions and the adoption of sustainable practices across all sectors. Within the specific context of the banking industry, traditional practices involving paper consumption and employee travel, together with the energy required for maintaining physical premises, as well as that generated by current digitalization trends in order to ensure the functioning of IT infrastructure, contribute to the Bank's ecological footprint.

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

For this reporting exercise, the Bank performed the calculation of greenhouse gas emissions for Scope 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 performed using the standards established within 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 set out within the GHG Protocol were respected: relevance, completeness, consistency, transparency and accuracy.

For the calculation of greenhouse gas emissions, scope 3, category 15, financed emissions, PCAF was used, a global standard used by financial institutions to measure and disclose greenhouse gas emissions associated with their lending and investment portfolios. It is fundamental in helping financial institutions understand their carbon footprint, thus enabling them to develop strategic initiatives in order to become a low-carbon organization. PCAF developed various methodologies tailored to measure emissions for different financial products and investment categories, including, but not limited to, project finance, mortgage loans, 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. Data granularity may have a significant impact on the accuracy of emissions calculations. The result is usually represented as absolute emissions or emissions intensity, providing essential information for strategic decision-making and target setting towards a climate-resilient economy.

With regard to the consolidated perimeter, the Bank’s subsidiary, EximAsig, was not included in the financed emissions calculation, considering the insignificant impact of its operations within the total financed emissions recorded at Bank level.

#### 7.2.2.3 Energy consumption and mix E1-5

The Bank collected a series of information necessary for calculating greenhouse gas emissions, while the information captured within the databases and its granularity required, in certain cases, the use of proxies for determining emissions. In this context, and also considering the necessary granularity of information, the Bank cannot reasonably provide the information required regarding energy consumption and mix in order to provide an understanding of the Bank’s total energy consumption in absolute value, the improvement of energy efficiency, exposure to coal, oil and gas-related activities, as well as the share of energy from renewable sources within its overall energy mix.

#### 7.2.2.4 Gross Scope 1, 2, 3 GHG emissions and total GHG emissions E1-6

The Bank performed a calculation of greenhouse gas emissions considering mainly:

- gross Scope 1 GHG emissions, in order to provide an understanding of the direct impact on climate change;
- gross Scope 2 GHG emissions, in order to provide an understanding of the indirect impact on climate change caused by consumed energy, regardless of whether it is purchased or externally sourced;
- gross Scope 3 GHG emissions, in order to provide an understanding of GHG emissions occurring within the upstream and downstream value chain other than its Scope 1 and Scope 2 GHG emissions. These represent the main component of emissions and constitute an important transition risk factor;
- total GHG emissions, in order to provide a general understanding of GHG emissions and whether these originate from own operations or from the upstream and downstream value chain. This disclosure is a prerequisite for measuring progress achieved towards reducing GHG emissions in line with the Bank’s climate targets.

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

For 2025, the Bank identified exposures under the following asset classes according to the PCAF methodology: Corporate loans, Corporate bonds, Government securities, Mortgage loans, Equity. The Bank did not classify exposures under the categories Project finance, Commercial real estate loans or Vehicle loans.

The general formula used for calculating financed emissions was:

***Financed emissions = Emissions x attribution factor***

where:

• **Emissions:** The actual GHG emissions of counterparties, which may be:

- Emissions directly reported by the counterparty;
- Emissions based on physical activity (consumed gas, tonnes of steel produced, etc.); or
- Economic activity-based emissions (tCO<sub>2</sub>/revenue millions).

• **Attribution factor:**

- This factor determined the share of emissions attributed to the Bank based on its financing. Consequently, it is always capped at 1.
- It is calculated by taking the outstanding balance of a loan or investment and dividing it by a certain measure of total value (such as origination value for real estate properties and enterprise value for corporate loans).

**For the Mortgage loans category, the following input data and assumptions were used:**

• **Emissions:** were calculated by multiplying the useful surface area (in m<sup>2</sup>) of the property by the emission factor (tCO<sub>2</sub>e/m<sup>2</sup>) retrieved from the European database of PCAF building emission factors (<https://building-db.carbonaccountingfinancials.com/>), based on country, property type and energy performance certificate class (EPC).

• **The attribution factor:** was calculated as the share of the outstanding loan balance applied to the origination value of the property.

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

• **Emissions:** For estimating emissions associated with counterparties, the Bank used Scope 1 emission intensities at industry level published by EUROSTAT, expressed in tonnes CO<sub>2</sub> per each RON 1 million output generated by the respective industry. Since companies' financial statements do not include output data (defined within national accounts as production at basic prices), the institution used Total Revenues as a proxy, noting that these may exceed the level of output reported by EUROSTAT, which may lead to a slightly conservative overestimation of emissions. In addition, although EUROSTAT also publishes values for 2024, these are marked with observation flag "i" (estimated/provisional values calculated by national agencies). In order to maintain methodological robustness, the Bank opted to use the intensities corresponding to 2023, as the complete reported and validated dataset.

In limited cases, emissions were directly reported by counterparties within their sustainability reports.

• **Attribution factor:**

- It was calculated as the share of balance sheet exposure relative to:
  - *EVIC (Enterprise Value Including Cash)* for listed companies;
  - *Equity + Total Liabilities* for unlisted companies for which EVIC is not available within the database.
- For corporate loans and corporate bonds, this factor is always capped at 1 at client level;
- 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 according to asset class and industry or according to 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 resulting benefit; therefore, a proxy based on Romanian emissions data sourced from the National Institute of Statistics (INS) was used.

As at 31.12.2025, the above proxy approach was used only for the Equity asset class, namely for 0,06% of the total outstanding balance in RON of the assets included within the scope of the GHG emissions calculation.

Consequently, the application of Romanian emission factors for such a small share of exposure represents a pragmatic and efficient approach, maintaining reasonable accuracy without incurring excessive efforts.

**For the Government securities category, the following input data and assumptions were used:**

- **Emissions:** country emissions retrieved from EDGAR – Emissions Database for Global Atmospheric Research (<https://edgar.jrc.ec.europa.eu/>).
- **Attribution factor:** was calculated based on the share of exposure within the country's total GDP PPP UD (expressed in RON equivalent), using data published by the World Bank.

**Limitations**

*a. Mortgage loans*

With regard to mortgage loans for which an EPC rating was not available, in 2024 two options were considered:

- Using the emission factor corresponding to “n/a” from the PCAF database; or
- Using an average EPC rating calculated based on the Bank's existing data (available for 2% of mortgage loan agreements).

The Bank chose the second option based on actual data regarding energy performance at loan origination, the result being slightly more conservative compared to using the first method.

Starting with the 2025 reporting year, considering that the share of loans with available EPC rating is insignificant at portfolio level, the Bank applies a simplified method: in situations where an individual EPC rating is unavailable, **PCAF emission factors corresponding directly to the building type** (single-family or multi-family) are used, in accordance with the methodological recommendations applicable to portfolios with low EPC coverage.

*b. Corporate loans, corporate bonds, equity*

The Bank adopted a deviation from the standard PCAF methodology in calculating financed emissions. More specifically, the Bank is currently limited to calculating only Scope 1 emissions for its counterparties, using industry emissions sourced from EUROSTAT. Consequently, Scope 2 and Scope 3 emissions are not included within the financed emissions calculation. This approach is justified by the following considerations:

1. Limited data availability:

Detailed and reliable data for Scope 2 and Scope 3 emissions are often not consistently available for all counterparties, which hinders the ability to generate accurate assessments.

2. Aspects related to data quality and comparability:

The various reporting practices and differing quality of emissions data for Scope 2 and Scope 3 introduce significant challenges in ensuring comparability and consistency across different sectors.

3. Methodological complexity:

Calculating Scope 2 and Scope 3 emissions involves complex, often customized methodologies requiring extensive data and assumptions, complicating the standardization process.

4. Resource constraints:

The additional resources required for collecting, verifying and analysing comprehensive Scope 2 and Scope 3 data are currently disproportionate relative to the incremental benefit in accuracy, especially considering the existing data gaps.

5. Alignment with national practices:

The Bank's current approach aligns with national reporting practices, as the National Institute of Statistics mainly published average industry figures for Scope 1 emissions, ensuring consistency with national benchmarks.

With regard to data quality (DQS), the Bank used:

• Score 2 for:

- Unaudited emissions directly reported by counterparties – limited cases identified for corporate loans;
- Unaudited country-reported emissions according to EDGAR for sovereign exposures;

• Score 3 for

- Mortgage loans for which average emission factors were used based on actual surface area, EPC rating and collateral type (i.e. data available within the Bank's systems/databases);

- Score 4 for:
  - National proxies (data sources from EUROSTAT) for commercial loans, corporate bonds and equity;
- Score 5 for:
  - Estimated emissions (i.e. emissions calculated as a result of the limitations described above) for corporate loans and equity, due to missing or incomplete financial data or counterparties;
  - Mortgage loans for which an estimate of the EPC rating and useful property surface area was performed due to incomplete data regarding the related collaterals.

Below is an analysis of 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 (tCO<sub>2</sub>) and average emissions intensity (tCO<sub>2</sub>/MRON financed) by asset classes as at 31 December 2025

Asset class	Exposure balance (RON)	Of which direct/ reported emissions were collected	Emissions tCO <sub>2</sub>	Of which were directly reported/ collected	Financed emissions tCO <sub>2</sub>	Intensity tCO <sub>2</sub> /mil. RON	Avg DQS
Corporate loans	9.099.393.425	0	13.993.742	0	466.731	51,29	4,01
Corporate bonds	113.962.479	0	99.312	0	107	0,94	4
Equity	10.490.266	3.404.099	648.091	614.589	106	10,12	3,35
Mortgage loans	1.990.338.775	0	15.114	0	8.805	4,42	5,09
Government securities	6.913.210.400	0	5.194.737.078	0	171.774	24,85	2
<b>TOTAL</b>	<b>18.127.395.345</b>	<b>3.404.099</b>	<b>5.209.493.337</b>	<b>614.589</b>	<b>647.523</b>	<b>35,72</b>	<b>3,36</b>

Total financed emissions (tCO<sub>2</sub>) and average emissions intensity (tCO<sub>2</sub>/MRON financed) by asset classes as at 31 December 2024

Asset class	Exposure balance (RON)	Of which direct/ reported emissions were collected	Emissions tCO <sub>2</sub>	Of which were directly reported/ collected	Financed emissions tCO <sub>2</sub>	Intensity tCO <sub>2</sub> /mil. RON	Avg DQS
Corporate loans	8.834.345.188	78.403.194	20.355.142	2.832.922	452.408	51,21	4
Corporate bonds	54.357.447	0	31.788	0	21	0,38	4
Equity	5.836.272	575.924	701.465	614.589	110	18,93	4,11
Mortgage loans	1.970.510.755	0	17.191	0	10.391	5,27	5,12
Government securities	4.197.528.352	0	3.598.981.620	0	106.887	25,46	2
<b>TOTAL</b>	<b>15.062.578.014</b>	<b>78.979.119</b>	<b>3.620.087.205</b>	<b>3.447.511</b>	<b>569.817</b>	<b>37,83</b>	<b>3,59</b>

For 2025, financed emissions related to government securities include the entity EximAsig (1.474 tonnes CO<sub>2</sub> financed emissions out of a total of 171.774 tonnes CO<sub>2</sub> total financed emissions). For 2024, the emissions include only Exim Banca Românească.

For 2025, financed emissions related to mortgage loans without an available EPC rating were estimated using the emission factor corresponding to "n/a" from the PCAF database. For 2024, these emissions were estimated using the average EPC rating calculated based on the Bank's existing data, namely B (available for 2% of mortgage loan agreements).

The highest emissions intensity per RON 1 million (51,29) and the highest contribution to the Bank's average (72,08%) are observed for corporate loans. The average data quality score for this category is relatively high (4). The second contribution to the Bank's average (26,53%) comes from the sovereign asset class; however, the emissions intensity (24,85) is below the average (35,72). The third contribution to the Bank's average (1,36%) comes from mortgage loans; however, the emissions intensity (4,42) is significantly below the average.

The result of the GHG emissions calculation across all categories is presented in the table below, with the information separately presenting the consolidation perimeter for each component.

Scope	Type of activity	Reference year 2024	Reference year 2025	Unit
Scope 1	Stationary combustion - Exim Banca Românească	731,21	688,58	tonnes CO2e
Scope 1	Mobile combustions - Exim Banca Românească	322,66	306,98	tonnes CO2e
Scope 1	Stationary combustion - EximAsig	7,69	11,51	tonnes CO2e
Scope 1	Mobile combustions - EximAsig	32,66	35,19	tonnes CO2e
<b>Scope 1</b>	<b>Gross Scope 1 GHG emissions</b>	<b>1.094,21</b>	<b>1.042,26</b>	<b>tonnes CO2e</b>
<b>Scope 1</b>	<b>Percentage of GHG emissions from regulated emissions trading schemes (%)</b>	<b>0</b>	<b>0</b>	<b>-</b>
Scope 2	Purchased electricity (location-based) – Exim Banca Românească	788,17	754,78	tonnes CO2e
Scope 2	Purchased electricity (market-based) – Exim Banca Românească	790,02	482,77	tonnes CO2e
Scope 2	Purchased electricity (location-based) – EximAsig	8,88	9,58	tonnes CO2e
Scop 2	Purchased electricity (market-based) – EximAsig	8,65	8,08	tonnes CO2e
Scope 2	Purchased heat and steam – Exim Banca Românească	136,96	139,85	tonnes CO2e
Scope 2	Purchased heat and steam – EximAsig	0,00	0,00	tonnes CO2e
<b>Scope 2</b>	<b>Gross location-based Scope 2 GHG emissions</b>	<b>934,01</b>	<b>904,21</b>	<b>tonnes CO2e</b>
<b>Scope 2</b>	<b>Gross market-based Scope 2 GHG emissions</b>	<b>935,64</b>	<b>630,7</b>	<b>tonnes CO2e</b>
Scope 3.1	Purchased goods and services	4.726,65	4.286,98	tonnes CO2e
Scope 3.2	Capital goods	-	871,94	tonnes CO2e
Scope 3.3	Fuel and energy-related activities (not included in Scope 1 or Scope 2)	291,05	327,59	tonnes CO2e
Scope 3.4	Upstream transportation and distribution	-	-	tonnes CO2e
Scope 3.5	Waste generated in operations	2,77	2,58	tonnes CO2e
Scope 3.6	Business travel	71,41	220,39	tonnes CO2e
Scope 3.7	Employee commuting (total estimated)	557,85	600,81	tonnes CO2e
Scope 3.8	Upstream leased assets	-	-	tonnes CO2e
Scope 3.9	Downstream transportation	-	-	tonnes CO2e
Scope 3.10	Processing of sold products	-	-	tonnes CO2e
Scope 3.11	Use of sold products	-	-	tonnes CO2e
Scope 3.12	End-of-life treatment of sold products	-	-	tonnes CO2e
Scope 3.13	Downstream leased assets	-	-	tonnes CO2e
Scope 3.14	Franchises	-	-	tonnes CO2e
Scope 3.15	Investments*	569.817	647.523	tonnes CO2e
Scope 3.15	Insurance		1.511	tonnes CO2e
<b>Scope 3</b>	<b>Total gross indirect (Scope 3) GHG emissions - Exim Banca Românească, Exim Asig</b>	<b>575.466,73</b>	<b>655.344,37</b>	<b>tonnes CO2e</b>
	<b>Total GHG emissions (location-based)</b>	<b>577.494,95</b>	<b>657.290,84</b>	<b>tonnes CO2e</b>
	<b>Total GHG emissions (market-based)</b>	<b>577.496,58</b>	<b>657.017,33</b>	<b>tonnes CO2e</b>

\* For 2025, the emissions related to Scope 3.15 Investments (corporate loan portfolio, Corporate Bonds, Equity) were determined using emission intensities (total CO2 emissions / revenues) published by EUROSTAT. For 2024, these intensities were obtained from the National Institute of Statistics (INS).

### GHG intensity based on net revenues

GHG intensity was determined in accordance with ESRS requirements, respectively by reporting the Bank's total GHG emissions in metric tonnes of CO<sub>2</sub> equivalent to the Bank's net revenues.

Thus, GHG intensity from the perspective of the two calculation methods is presented below:

#### Location based:

- Total GHG emissions: 657.290,84 tonnes CO<sub>2</sub>e
- Net revenues (operational at Group level): 828.106.000 lei
- GHG intensity: 0,00079372

#### Market based:

- Total GHG emissions: 657.017,33 tonnes CO<sub>2</sub>e
- Net revenues (operational at Group level): 828.106.000 lei
- GHG intensity: 0,00079339

#### Year 2024

#### Location based:

- Total GHG emissions: 577.494,95 tonnes CO<sub>2</sub>e
- Net revenues (operational at Group level): 756.961.000
- GHG intensity: 0,00076291

#### Market based:

- Total GHG emissions: 577.496,58 tonnes CO<sub>2</sub>e
- Net revenues (operational at Group level): 756.961.000
- GHG intensity: 0,00076291

#### Waste management

The specific business sector involves low resource consumption at the level of direct operations, frequently using 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 records thereof are maintained in accordance with the national Waste List established by Government Decision 856/16.08.2002, as subsequently amended.

### 7.3 Social information

Human resources policies, procedures and practices are permanently aligned with the practices developed at banking market level and aim to establish the minimum rights guaranteed to all employees, promote fair labour relations intended to ensure employees' social protection, reciprocal cooperation in the field of labour relations and the promotion of social partnerships. They also take into account collective bargaining, namely the negotiation of the Collective Labour Agreement at Bank level, which ensures freedom of expression, equal opportunities in the exercise of the profession, performance of activities, employees' rights and obligations and the prohibition of all forms of discrimination.

The implementation of ESG requirements and the management of workforce-related impacts are supported through dedicated resources at Bank level. (S1\_4\_09)

Occupational health and safety, professional training, diversity and inclusion, social dialogue and personnel data management activities are carried out through the operational budgets of the Human Resources Division and the other relevant structures. Additional resources (dedicated teams, training, digital tools, questionnaires and operational processes) were allocated to the implementation of projects carried out during 2024–2025, such as the analysis of the ESG risk governance framework, the development of performance and risk indicators for the ESG risks Dashboard related to the workforce.

#### 7.3.1 Own workforce S1-6; SBM-3

The management practices developed at Bank level were based on the continuous awareness of the importance of the human factor in the proactive and professional development and motivation of employees, as well as on the continuous development of adaptation and integration practices within an attractive, inclusive and collaborative working environment, so that each employee has the opportunity to develop the necessary competencies and skills.

Exim Banca Românească's recruitment and selection policy is based on identifying and attracting personnel with a high level of expertise and professional reputation, capable of bringing added value to the position they hold within the Bank, as well as on the development and promotion of ethical values and standards of professional conduct, in order to ensure a high-performing and safe working environment.

Thus, the Bank has a team made up of professionals dedicated to providing high-quality financial products and services to its customers.

The structure of personnel at the end of 2025 within Exim Banca Românească is presented as follows:

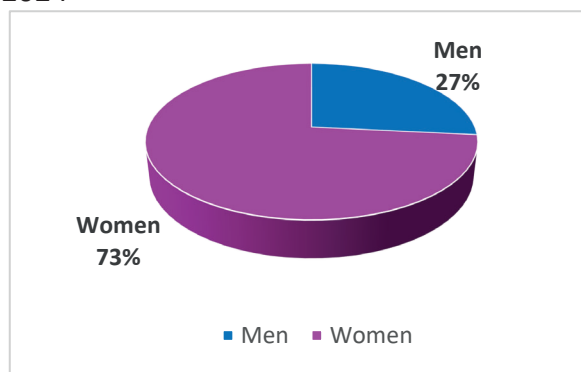
- Total number of employees, expressed as headcount and broken down by gender and working schedule

	2024			2025		
	Women	Men	Total 2024	Women	Men	Total 2025
Number of employees	967	350	1.317	996	364	1.360
Permanent	945	341	1.286	966	360	1.326
Fixed-term	22	9	31	30	4	34
Full-time	965	350	1.315	995	363	1.358
Part-time	2	0	2	1	1	2

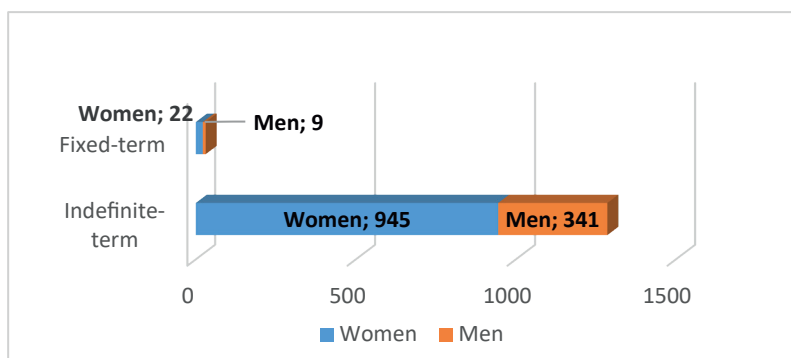
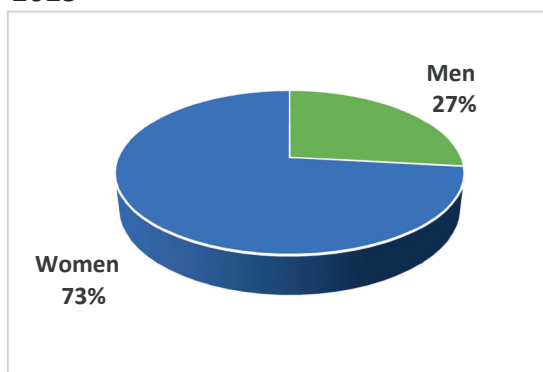
- Total number of employees, expressed as headcount and broken down by gender, location, age and turnover rate

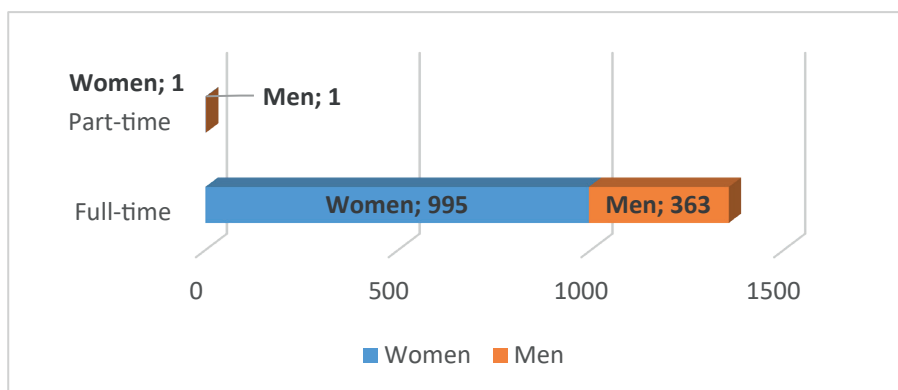
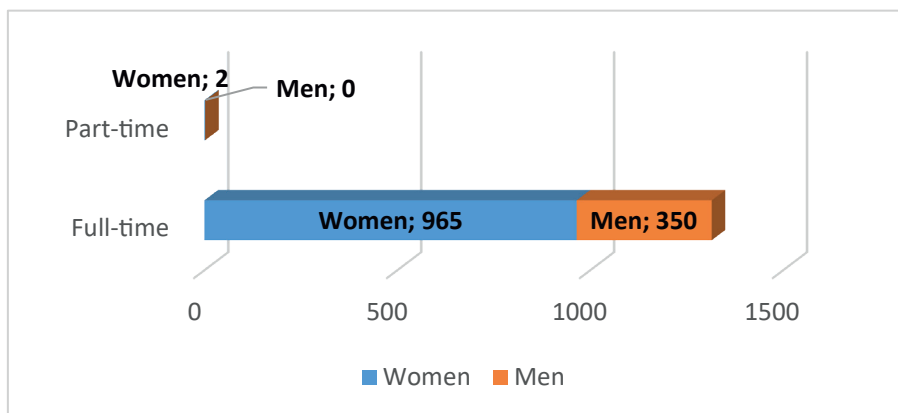
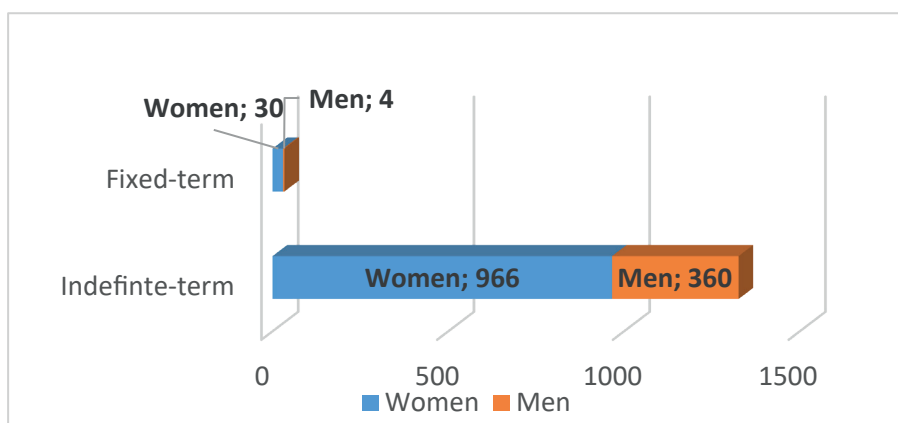
	2024				2025			
	Hires	% of the average total number of employees	Terminations	% of the average total number of employees	hires	% of the average total number of employees	Terminations	% of the average total number of employees
<b>Gender</b>								
Women	139	10,57%	142	10,80%	182	13,67%	153	11,50%
Men	36	2,74%	43	3,27%	57	4,28%	43	3,23%
Total	175	13,31%	185	14,07%	239	17,96%	196	14,73%
<b>Location</b>								
Head Office	98	7,45%	85	6,46%	119	8,94%	71	5,33%
Territorial units	77	5,86%	100	7,60%	120	9,02%	125	9,39%
Total	175	13,31%	185	14,07%	239	17,96%	196	17,73%
<b>Age</b>								
< 30 years	37	2,81%	32	2,43%	48	3,61%	36	2,70%
30 - 50 years	108	8,21%	126	9,58%	146	10,97%	103	7,74%
> 50 years	30	2,28%	27	2,05%	45	3,38%	57	4,28%
Total	175	13,31%	185	14,07%	239	17,96%	196	14,73%

2024



2025





**Methodology for calculating the number of employees (S1-6\_11, S1-6\_12, S1-6\_13, S1-6\_14)**

All figures presented for the reporting year are expressed as headcount, not as full-time equivalent (FTE), as an average throughout the reporting period.

Breakdowns by permanent/fixed-term contracts correspond to the requirements of ESRS S1-6 point (b)(i) and (b)(ii), while breakdowns by full-time/part-time correspond to the requirement of S1-6 point (b)(iii).

The information is extracted from the HR application as at 31 December, reflecting the year-end structure. No estimates or FTE weightings were used, as the Bank does not use contracts with non-guaranteed working hours.

The turnover rate is calculated in accordance with ESRS S1-6, by reporting the number of terminations during the reporting period to the average total number of employees for the respective year. This methodology was introduced starting with 2025 and is applied uniformly for all employee categories (gender, age, location).

### 7.3.1.1.1 Working time

Employment relationships are governed by labour legislation and applicable agreements (Collective Labour Agreement and Individual Employment Agreements), which also establish working time.

In order to create a balance between the personal and professional life of its employees, the Bank has provisions regarding individualized working schedules, with the consent or at the request of employees, in compliance with the provisions of the Internal Regulation applicable at Bank level, the Collective Labour Agreement and the Labour Code. Individualized working schedules involve a flexible organization of working time.

The Bank does not encourage overtime work, ensuring a balance between personal and professional life.

### 7.3.1.1.2 Adequate wages – S1-10; S1-16

The practice regarding the remuneration system at Bank level is based on alignment with the Romanian banking system, through the granting of competitive salaries at banking market level, in order to ensure well-trained employees with experience and professional reputation. In order to achieve this objective, the Bank participates in salary surveys or purchases salary studies.

Exim Banca Românească complies with the principle of fairness, objectivity and transparency, taking into account the business strategy, organizational culture and the Bank's values, long-term interests and business performance and incorporates measures to avoid conflicts of interest.

Within the Bank, employee remuneration is carried out without discrimination based on gender. When calculating remuneration levels, each employee category is analysed (B-1, B-2, other management positions or specialists), correlated with the job grade, which reflects the impact of the position within the Bank's hierarchy.

Employee category	Basic salary ratio between women and men	
	2024	2025
B-1	-18%	-17%
B-2	-9%	-6%
Management	-23%	-16%
Specialists	-23%	-23%

Within the Bank, the monthly basic salary is equivalent to the gross hourly salary, there being no structural differences between these two methods of expressing remuneration. For 2025, in addition to 2024, the difference in remuneration between women and men was also calculated based on total earned income:

Employee category	Ratio of total income between women and men - 2025
B-1	-9%
B-2	+5%
Management	-19%
Specialists	-27%

For 2025, the ratio between the annual total remuneration of the highest-paid individual in the organization and the median annual total remuneration for all employees (excluding the highest-paid individual) recorded a value of 7,2 (versus 7,72 in 2024).

### 7.3.1.1.3 Social dialogue – S1-2

At Bank level, the institution of employee representation is recognized and operates in compliance with the Social Dialogue Law.

Through the institution of employee representatives at Bank level, within the partnership developed especially through the negotiation of the Collective Labour Agreement, the Bank permanently ensures an open dialogue, in which employees are encouraged to express their concerns and needs.

Social dialogue is based on transparent and continuous communication with all employees (100%) and is a current practice within Exim Banca Românească, ensuring that all topics important to employees are addressed in an inclusive and collaborative manner.

The Bank and the elected employee representatives ensure a constructive dialogue in order to inform all employees about the provisions of the Collective Labour Agreement, and the interpretation of clauses is carried out by consensus.

At Bank level, the Collective Labour Agreement was negotiated for an additional period of 2 years with the elected employee representatives, namely for the period 2025–2026, based on the mandate granted by employees regarding their rights.

Communication with employees is carried out through multiple channels, both online (email, instant messages, the Bank’s internal portal, online learning platform etc.) and through structured direct communication (meetings, 1-to-1 discussions), at any hierarchical level.

#### 7.3.1.1.4 Freedom of association, existence of works councils and workers’ information, consultation and participation rights

Employee representatives hold the mandate for negotiating the Collective Labour Agreement, in order to ensure the observance of employees’ rights and defend employees’ interests regarding salaries, working conditions, working time, job security and other professional, economic and social aspects related to labour relations. In addition, they play a crucial role in consolidating colleagues’ proposals and engaging in negotiations with management representatives.

#### 7.3.1.1.5 Collective bargaining, including the proportion of workers covered by collective labour agreements – S1-8

Collective bargaining is ensured through compliance with Law no. 367/2022 – the Social Dialogue Law.

The provisions of the Collective Labour Agreement produce effects for all employees (100%) within the Bank’s internal structures/territorial units, regardless of position or hiring date.

Thus, all Exim Banca Românească employees are covered by the provisions of the Collective Labour Agreement, applicable throughout the entire organization. The Bank does not have subsidiaries in other countries and does not employ foreign workers, therefore the collective agreement coverage level is 100% of its own workforce.

#### 7.3.1.1.6 Work-life balance S1-15

At Bank level, according to internal procedures, there is no differentiation between the benefits granted to full-time employees and those granted to part-time employees. Benefits are granted to all employee categories, without discrimination based on citizenship, race, gender, colour, 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.

The Bank, in accordance with internal regulations, grants employees additional leave days beyond those stipulated by law, for participation in various family events, as provided by the Collective Labour Agreement.

	Year	Women		Men		Total	
		No.	%	No.	%	No.	%
Employees who benefited from family-related leave	2024	154	12%	56	4%	210	16%
	2025	169	12,7%	58	4,3%	227	17%

In addition, the Bank supports the social needs of employees and grants, through the Social Committee, social aid for their special situations or those of family members.

The Social Committee analyses and evaluates employees’ requests and the documents provided by them, in order to determine the amount of the proposed social aid that Exim Banca Românească may grant to employees and first-degree family members, as well as to spouses.

### 7.3.1.1.7 Health and safety – S1-1; S1-14

Employee well-being is a priority for Exim Banca Românească, protected through individual responsibility and strengthened by our role as a responsible employer.

At Bank level, in accordance with applicable legal requirements and the strategy regarding social and social protection objectives, the General Procedure – Ensuring Occupational Health and Safety of the Bank's Employees was developed.

For monitoring occupational health status, the Occupational Safety and Health Committee (OSHC) was established within the Bank, with the role of organizing and controlling prevention and protection activities within the Bank.

Therefore, health programmes and services are structured to improve and maintain employees' physical and intellectual health, through the periodic performance of medical check-ups, given their role and importance.

Thus, the Human Resources Division, based on the legal framework, ensured the organization of this activity through the establishment of a specialized unit, namely the Occupational Safety and Health Unit, which has the role of developing and implementing the health strategy and integrating health services and programmes at Bank level, as well as ensuring the implementation of a package of medical services and benefits offered to employees by specialized clinics.

A constant concern is to ensure and manage risks and potential incidents in the workplace, with the risks that may arise in the activities carried out by employees being assessed and identified, as well as the measures that may lead to their mitigation and, last but not least, the continuous assessment through performed controls, which ensure the maintenance of occupational health and safety standards.

The Bank grants the same safety standards to personnel falling within the scope of contractors providing various services within the Bank, throughout the entire duration of the collaboration. Thus, the Bank expects contractors to adhere to its standards and monitors compliance therewith throughout the collaboration period.

Exim Banca Românească assumes its obligations regarding ensuring occupational health and safety for all employees, in all aspects related to work, and ensures the regulatory framework regarding occupational health and safety, as well as emergency situations and fire prevention and protection, ensuring the necessary conditions for compliance therewith.

Through the Occupational Safety and Health Unit, the Bank ensures conditions so that each employee receives sufficient and adequate training in the field of occupational health and safety, especially in the form of information and work instructions specific to the workplace and occupied position.

For 2025, 2 cases of work-related accidents or fatalities were reported among the Bank's employees, these being commuting accidents, following the reclassification of one of the three incidents initially reported.

No medical leave days generated by occupational or commuting accidents were recorded in 2025.

The Bank did not record cases of occupational diseases or deaths associated with work activities.

In connection with the reported occupational and commuting accidents, the Bank did not receive fines, sanctions or compensation claims during 2025.

<b>Employees covered by the health management system</b>					
<b>Year</b>	<b>No.</b>	<b>%</b>	<b>Of which number of deaths</b>	<b>Of which number of work-related injuries</b>	<b>Of which work-related diseases</b>
2024	1.317	100%	0	0	0
2025	1.360	100%	0	2	0

### 7.3.1.2 Equal treatment and opportunities for all – S1-1

At Bank level, in accordance with applicable legal provisions, duties and responsibilities regarding workplace diversity, equal opportunities and non-discrimination have been defined, provisions described in the Collective Labour Agreement, Internal Regulation and Code of Ethics, reported to the provisions of the Universal Declaration of Human Rights, the UN Global Compact Principles and the International Labour Organization guidelines.

#### 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 regarding diversity, equal opportunities and non-discrimination both in the Collective Labour Agreement and in the Internal Regulation and the Code of Ethics.

Human resources decisions regarding appointments, promotion decisions, remuneration and employee evaluation are based exclusively on employees' competencies, performance and potential, without mentioning gender, being based on the position to be filled and not on gender criteria.

The Bank applies the principle of equal remuneration between women and men through pay transparency, evaluating current salary data from the perspective of internal fairness (the degree of compliance with the salary grid and other rules).

#### 7.3.1.2.2 Training and skills development – S1-13

The training and professional development activity of the Bank's employees ensures the framework for creating continuous training/professional development opportunities for employees, with the purpose of developing the skills and competencies necessary to ensure a high-performance culture that leads to the achievement of the Bank's strategic objectives.

The continuous updating of employees' competencies through modern learning methods and the integration of technology in information transfer and knowledge consolidation was achieved through the implementation of in-house or open programmes aimed at developing employees' technical and soft skills, as well as through the use of the e-learning platform.

Within the Annual Professional Training Plan approved for 2025, training programmes were implemented with the objective of the continuous development of managers of internal structures and territorial units, both for corporate and retail activities, with the purpose of improving managerial and leadership competencies and strengthening teams, as well as programmes intended to consolidate knowledge and develop employees' technical competencies and soft skills. At the same time, mandatory programmes resulting from legal regulations were organized in the following fields: AML/KYC/CFT, Compliance, MIFID II, GDPR, ESG, Anti-fraud.

During 2025, over 25 training programmes were organized through the e-learning platform, of which 10 mandatory programmes, in accordance with the regulations in force, as well as programmes organized internally or with external professional training providers, with concrete objectives regarding the improvement of professional competencies.

Specific technical programmes were completed on the e-learning platform, totalling over 8200 course modules, based on the training and professional development proposals identified at the level of internal structures and territorial units.

The implementation of programmes developed internally by experts carrying out their activity within the Bank, intended to facilitate knowledge exchange and promote best working practices within Exim Banca Românească, through the promotion of updated information regarding products and work processes related to internal structures and territorial units.

At the same time, internal programmes with specialized themes (deposits and operations, customers and accounts etc.) were allocated on the e-learning platform, the programmes being completed by over 400 employees.

#### **ESG-related training and internal communication**

The programme with themes and objectives in the Sustainability area within lending activities was available on the e-learning platform and completed by employees within the corporate functional line and the risk division, the programme being organized in accordance with the Sustainability Strategy approved at Bank level. At the same time, specializations of certain specialists in the ESG area were recorded through their participation in programmes offered by specialized professional training providers.

During 2025, 1289 employees participated in training programmes, in accordance with the approved professional training plan, representing approximately 97% of total employees, while the total number of participations in professional training modules exceeded 15.000, representing an average of 11,5 participations/employee.

The number of employees who participated in training and professional development programmes represents approximately 73% women and 27% men.

The number of training hours averages around 41 training hours/year/employee, regardless of gender, including all types of professional training programmes.

Training programmes are available to all employees, and participation reflects the gender structure of the workforce. In 2025, the distribution of participation in training programmes was 73% women and 27% men, an identical share to that of completed training hours, as sessions are accessible to all personnel categories without differentiation.

#### 7.3.1.2.3 Employment and inclusion of persons with disabilities – S1-12

The Bank carries out its activity in accordance with its fundamental responsibilities regarding the respect of human rights and labour rights.

At Bank level, the provisions of Law no. 448/2006 were complied with, while also taking into consideration the provisions of Emergency Ordinance no. 127/2024 regarding certain measures in the social field, currently having 10 employees holding disability certificates, representing 0,74% of the total, and for the difference provided by law up to the employment of 4% of the total number of employees, the Bank pays the related contributions in accordance with legal requirements:

	Year	Women	Men	Total
Number of persons with disabilities	2024	7	4	11
	2025	6	4	10

#### 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, any form of discrimination being prohibited, regardless of whether it is based on race, nationality, ethnicity, language, religion, social category, beliefs, gender, sexual orientation, age, disability, chronic non-contagious disease, HIV infection, belonging to a disadvantaged category or any other criterion.

According to the Procedure regarding the prevention and combating of gender-based harassment, as well as moral harassment in the workplace, applicable at Bank level, all employees have the right and are encouraged to report any case considered to constitute harassment or discrimination.

Through specific internal procedures and in compliance with applicable legislation, the Bank guarantees that it implements appropriate measures to combat retaliation of any kind against persons reporting breaches of law or assisting in the investigation of discrimination or harassment cases of any kind, in the sense that any such retaliation is prohibited and thoroughly investigated.

In 2025, no complaints regarding harassment incidents were registered.

#### 7.3.1.2.5 Diversity – S1-9

Exim Banca Românească continuously 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 regarding the promotion of diversity management, the Bank leverages talents and promotes workforce diversity, while at the same time seeking appropriate ways to develop an inclusive, innovative and high-performing organization.

	2024				2025			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Total personnel	107	818	392	1.317	108	816	436	1.360
% of total	8,12%	62,11%	29,76%	100,00%	7,94%	60,00%	32,06%	100,00%

Exim Banca Românească maintains a communication culture based on respect and appreciation, while the objective of the Human Resources Division is to maximize diversity within teams and ensure diversity at the highest management levels as well.

The personnel structure by gender at the level of the Bank’s management at the end of 2025 is presented below:

	2024					2025				
	Women	Men	%W	%M	Total	Women	Men	%W	%M	Total
B-1	11	14	44%	56%	25	12	15	44%	56%	27
B-2	31	38	45%	55%	69	11	10	52%	48%	21
Total	42	52	45%	55%	94	23	25	48%	52%	48

### 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 firmly commits 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 level, the commitment of the parties is important for ensuring transparency, effective communication and understanding and contributes to building a long-term relationship of trust and collaboration, bringing mutual benefits and supporting common objectives. This contribution allows the identification and management of risks or issues, as well as the capitalization of innovation and continuous improvement opportunities.

Through specific internal regulations, employees are obliged to respect the confidential nature of the information and documents they become aware of directly or incidentally (including through electronic mail) in carrying out their duties and responsibilities and to ensure that these are kept under appropriate physical and informational security conditions.

In addition, they must comply with legal provisions regarding data protection and ensure the confidentiality and integrity of personal data, respectively 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 the relationship with its customers, to provide the highest quality services and to meet their needs. 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 carrying out activities. Thus, the basic principle of the Policy regarding the management of customer complaints/requests is that any activity should be customer-oriented.

The purpose of the policy is to ensure an appropriate framework for carrying out the complaints management process within the Bank. Through this regulation, the Bank aims to:

- update and modernize the manner of handling complaints/requests, in order to align with legislative, regulatory and supervisory developments and requirements,
- provide clear and updated guidance regarding the procedure for the efficient handling of complaints/requests,
- increase staff awareness and provide guidance in order to avoid actions that could lead to fines or damage the Bank’s reputation,
- ensure trust and transparency in the Bank’s relationship with its customers,
- generally improve the level of services provided by systematically analysing and capitalizing on the information resulting from the handling of complaints/requests,
- improve the quality of customer relationships by strengthening a culture of regulatory compliance among the Bank’s staff,

- effectively monitor the management of complaints/requests in order to identify, assess, manage and reduce the risks associated with or resulting from their handling,
- strengthen the framework of moral and ethical conduct principles of the Bank's employees, as provided, in particular, in the Code of Ethics of Exim Banca Românească Staff.

The Bank monitors and analyses the causes of individual complaints in order to identify the common root causes of complaint types. Subsequently, based on the cases encountered and the ongoing analysis of complaints, it identifies recurring or systemic issues and brings them to the attention of the internal structure responsible for assessing potential legal and operational risks or the manner in which other processes or products are affected, including those that are not directly the subject of the complaint. The responsible structure takes the measures it considers necessary to correct such root causes whenever this is reasonably possible. The Bank's management is periodically informed regarding the complaints submitted by the Bank's customers.

In conclusion, effective complaint management, combined with continuous improvement measures, helps increase customer satisfaction and strengthen long-term relationships. By understanding customers' needs and concerns, the Bank can build a complaint management process that not only resolves issues, but also prevents their occurrence in the future.

During 2025, 96 justified complaints were registered, representing less than 1% of the customer database; during the same period, the National Authority for Consumer Protection (ANPC) imposed 1 fine on the Bank (RON 50.000 – contested by the Bank).

#### 7.3.2.2 Processes for engaging with consumers and end-users regarding impacts S4-2

Processes for engaging with consumers and end-users are essential for understanding the impacts of Exim Banca Românească's products or services on them. These processes help collect customer feedback, identify needs and improve user experience, consequently enabling the rapid adjustment of products and services in order to minimize negative impacts and maximize benefits.

Exim Banca Românească uses continuous and transparent communication in its relationship with consumers and end-users, making dedicated communication channels available to them, such as the customer support service (Call Center), which helps maintain a constant dialogue with users. Thus, they may report any negative or positive impact related to a product, and the Bank may respond promptly.

Furthermore, Exim Banca Românească uses social media posts to inform consumers about possible impacts, such as product updates or significant changes to the range of products and services offered.

#### 7.3.2.3 Processes to remediate negative impacts and channels through which consumers and end-users can raise concerns S4-3

Methods and measures adopted for the effective management of complaints and improvement of the information process:

##### 1. Implementation of an easily accessible complaints system:

o Customers have several easy methods available for submitting complaints:

1. As a form available on the Bank's website at <https://www.eximbank.ro/contact/>,
2. By electronic correspondence, to the dedicated e-mail address [reclamatii@eximbank.ro](mailto:reclamatii@eximbank.ro),
3. In writing, by submission at the headquarters of one of the Bank's branches or by postal transmission;

o The contact information for complaints is visible on the Bank's website, displayed at branch level and in contractual documents such as General Business Conditions for Individuals.

##### 2. Clear and well-defined process:

o The Bank carries out a standardised process for managing complaints, which includes clear steps for collecting information, assessing the complaint and resolving it.

o The Bank records complaints in a database, in order to track their history and prevent the recurrence of similar issues.

o The database is also used to monitor response time. The Bank drafts response letters in accordance with the legislation in force, as follows: the response deadline for complaints received from customers is 30 calendar days from the date of registration with the Bank, except for other deadlines imposed by specific legislation in force, by

authorities (for example 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.
- 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 Retail Complaint Management Department is responsible for the retail complaint management process/flow;
- Identification and involvement of a responsible entity, namely the internal structure responsible for remedying the cause and drafting/completing/amending the draft response.
- Each complaint is investigated in detail in order to understand the root cause of the dissatisfaction and to avoid temporary solutions.

### **Measures to improve the process:**

#### **1. Analysis of complaint frequency:**

- The Bank monitors and analyses complaint patterns in order to identify areas where recurring deficiencies exist (for example, non-compliant banking products, cumbersome workflows).
- At the same time, the Bank implements preventive measures to reduce the number of complaints, such as improving the staff training process.

#### **2. Continuous staff training:**

- Regular training for employees regarding the effective management of complaints, communication skills and conflict resolution techniques.
- Creating an organizational culture in which employees are encouraged to take initiative and address complaints in a professional and efficient manner.

### **Assessment of the effectiveness of interaction with consumers**

#### **1. Response and complaint resolution time:**

- The Bank considers measuring the average response and complaint resolution time in order to understand the efficiency of the process. Shorter time indicates faster and more efficient complaint handling.

#### **2. Long-term trend analysis:**

- The Bank reports trends in complaint management to management teams for strategy adjustment.
- In essence, impacts related to informing consumers and end-users are extremely important, considering that proper and transparent information may directly influence purchasing behaviour and may contribute to more responsible consumption.

The Bank adopts the following measures related to consumer information:

- provides clear and detailed information regarding products and services that enables customers to make informed and responsible decisions. For example, customers informed about the ecological impact of products may choose more sustainable products that comply with high standards of social and environmental responsibility.
- provides clear information regarding consumer rights (e.g. the right to withdraw from a lending product), contributing to increasing the level of trust in the market and thus protecting customers against abusive commercial practices. This may reduce conflicts between consumers and the Bank (potential complaints) and may lead to more responsible behaviour on their part.
- focuses on innovation and product improvement, adapting the products and services offered in order to better respond to market requirements. Thus, the Bank aims to improve customer experience and increase its competitiveness.
- contractual documentation is drafted in the spirit of clear, correct and complete information, containing accessible information, thus ensuring the protection of consumer rights, without discrimination, and contributing to the development of a sustainable economic environment.

## Conclusion

Impacts related to the correct and complete information of consumers are significant and directly influence consumer behaviour, public health, the environment and the global economy. Transparent information not only protects consumers, but also supports the Bank's development in a sustainable and responsible manner. By emphasizing the education and information of its customers, the Bank can build stronger and longer-lasting relationships, and in the long term this may bring significant benefits to all parties.

Exim Banca Românească has a marketing approach that includes ethical, sustainable and socially responsible practices, while keeping customer interests at the centre of attention. In this context, marketing activity focuses on delivering creative marketing campaigns that promote transparency and social responsibility.

The principles underlying the Bank's marketing actions are:

- communication based on fairness, respect, mutual trust, transparency and responsibility;
- continuous, consistent communication focused both on achieving the Bank's objectives and those of the other involved parties;
- transmission of complete, correct, objective and clear information, reflecting a real image of the Bank's products and activities.

Through its responsible marketing actions, the Bank acts towards:

- Increasing consumer trust through transparency regarding data collection, use and the implementation of security measures for protecting customer data.
- Customer centricity by prioritizing customer needs, preferences and well-being following the request and obtaining of feedback.
- Improving reputation by positioning itself as an organization that pays attention to integrity and social responsibility.
- Increasing customer loyalty by generating a more personalized and meaningful engagement with the target audience.
- Social responsibility through carrying out actions that support social causes or contribute to raising awareness regarding important issues or support positive change.
- Supporting sustainability – by integrating environmental and social principles into marketing strategies, the Bank may contribute to a sustainable future.

### 7.3.2.4 Confidentiality

Confidentiality within Exim Banca Românească is essential, because the Bank, through its employees, handles sensitive customer information, 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 breaches of confidentiality may have severe consequences for both the Bank and its employees.

As a personal data operator, the Bank has the responsibility to safely preserve the collected and stored data, in accordance with the provisions of the General Data Protection Regulation no. 679/2016, while also ensuring that it applies appropriate technical and organizational measures in order to comply with the principles regarding the legitimacy of data processing operations, as provided by the Regulation and the applicable national legislation.

Detailed information regarding personal data processing operations is available in the specific Information Notes, made available to customers upon initiation of the contractual relationship, as well as throughout its duration, by publishing them in the digital application and on the Bank's website [www.eximbank.ro](http://www.eximbank.ro) under the Data Protection section.

The main aspects of confidentiality within Exim Banca Românească:

#### 1. Applicable legislation and regulations

In Romanian banking legislation, **the obligation to ensure confidentiality** is clearly and comprehensively regulated, and two of the essential normative acts governing this aspect are:

- **Emergency Ordinance no. 99/2006** regarding credit institutions and capital adequacy;
- **NBR Regulation no. 5/2013** regarding reporting requirements for credit institutions.

Other relevant aspects regarding confidentiality in banking legislation:

- **Law no. 129/2019** regarding the prevention and combating of money laundering and terrorist financing imposes on banks the obligation 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.

- **GDPR Regulations (General Data Protection Regulation)** applicable at European level impose on banks the responsibility to protect customers' personal data and to use them only for legitimate purposes.

## 2. Types of confidential information

Personal data: Name, address, personal identification number, telephone number, e-mail address and other information that may identify a customer.

Financial data: Information regarding bank accounts, balances, financial transactions, loans, savings, investments and other financial operations.

Commercial data: Data related to a customer's banking relationships, loan conditions or other banking products, customer financial strategies.

Internal information: Data regarding the Bank's internal policies, business strategies and operating procedures.

## 3. Responsibilities of the Bank and employees

Employee confidentiality: Bank employees, regardless of their position, are required to sign confidentiality agreements. They may not disclose information regarding customers or the Bank's internal operations without express permission.

Limited access: Access to confidential information is restricted and limited according to each employee's need to know such information for the purpose of performing their duties.

Continuous training: Bank employees are periodically trained regarding the importance of data protection, legal regulations and internal security procedures.

## 4. Technical and organizational measures

The Bank implements authentication procedures for access to customer accounts, such as complex passwords, IT systems are monitored in order to detect and prevent unauthorized access, and they are also subject to regular audit in order to ensure compliance with security standards.

## 5. Rights of Exim Banca Românească customers regarding confidentiality

The Bank has procedures in place to manage security breaches (for example, data leaks), including notification of authorities and affected customers (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 fair 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 customers, such as low-income individuals, pensioners, persons with disabilities, those living in rural areas or other marginalized groups, for whom it offers specific products such as the payment account with basic services, with reduced or no fees for financially vulnerable/non-vulnerable customers.

Methods for promoting social inclusion in banking products:

### 1. Accessible and tailored banking products

- Payment accounts with basic services;
- Accessible saving products, savings products with minimum deposit amounts intended for persons who are not able to save large amounts, such as term deposits or savings accounts;
- Consumer loans, loans for customers who do not have a solid banking history or lower-value loans relative to income levels.

### 2. Technology and digitalization for financial inclusion

- Exim Banca Românească provides customers with an online banking platform that allows easy access to financial services, including for persons in rural areas or those with reduced mobility.
- Accessibility on mobile devices: the Bank provides 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 persons with disabilities with an accessible website for individuals with mild visual impairments and for persons with hearing disabilities.
- Personalized assistance services: Exim Banca Românească, in accordance with the applicable internal regulations, provides specialized assistance for persons with disabilities through branch employees trained to assist persons with special needs.

### 4. Reducing geographical barriers

- Access to ATMs and payment terminals in strategic locations: Exim Banca Românească provides its customers with ATM and MFM terminal installations in public locations, such as near shopping centres or markets, in or near city halls, in order to facilitate access for persons from less urbanized areas.

### 5. Consumer protection and transparency of banking products

- 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 comply with consumer rights, including transparency regarding the costs and fees associated with each transaction. In conclusion, social inclusion in the banking sector represents an important step towards ensuring a fair and accessible financial system for all categories of consumers, regardless of their economic, social or geographical status, Exim Banca Românească adopting specific measures aimed at:
  - reducing inequalities – access to financial services allows individuals from disadvantaged groups to save, invest and better manage their finances, thus contributing to the reduction of economic inequalities.
  - improving financial stability – access to appropriate banking products can help individuals make informed financial decisions, which may contribute to better management of financial resources and long-term stability.

The compliance function 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 and the management of significant risks related to them, as well as the pursuit of significant opportunities, represent important aspects of the strategy, especially in the current context of rapid market changes and evolving consumer requirements. The Bank aims to implement such measures in order to protect consumer interests, minimize risks for the Bank and capitalize on growth opportunities. Among these measures, the following may be mentioned: an essential measure for managing consumer-related risks is the protection of personal data, the Bank implementing security measures to protect consumer data, thus preventing risks related to security breaches; another effective measure for reducing risks and managing negative impacts is that the Bank ensures clear and transparent communication with consumers: notifications regarding changes in products, terms and conditions or product updates help manage expectations and reduce confusion and dissatisfaction.

With regard to pursuing and capitalizing on significant opportunities, Exim Banca Românească continuously invests in innovation and adaptation to market requirements: anticipating changes in consumer preferences, developing the functionalities of remote banking applications (Internet/Mobile Banking), creating products aligned with the market, improving user experience and helping the Bank better respond to market requirements.

#### 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

With regard to 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 has a series of indicators regarding operational risk, including indicators related to the number of customer complaints. Specific limits are assigned to these indicators in order to monitor whether the related risks remain within the risk appetite and risk tolerance established at Bank level. A five-level monitoring scale is used: “*low, low-medium, medium, medium-high and high*”. If these indicators exceed the assumed thresholds, mitigation plans are implemented.

## 7.4 Governance information

### 7.4.1 Business conduct

#### 7.4.1.1 Corporate culture and policies regarding business 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 employee development, the awareness and adoption of which encourage team members to make greater efforts towards achieving business objectives, starting from the Bank's mission and vision.

#### **Internal regulation regarding business conduct**

The management body of Exim Banca Românească has adopted and promotes at Bank level ethical and professional standards that define conduct in carrying out activities and prohibit or, as appropriate, adequately limit activities, relationships or situations that could reduce the quality of the activity management framework.

Ethics and responsibility in business are fundamental principles guiding the organization in its interactions with stakeholders and society in general. Compliance with 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, customers, suppliers and the community.

Ethical values and generally accepted principles regarding professional conduct are incorporated into the *Code of Ethics of Exim Banca Românească personnel*.

In addition, the following have also been developed within the Bank:

- *Code of conduct applicable to dealers within Exim Banca Românească;*
- *Code of ethical conduct for internal auditors;*
- *Code regarding the ethical conduct of Compliance Directorate personnel.*

***The Code of Ethics of Banca Românească personnel*** expresses the ethical and corporate values and principles promoted within the Bank. It promotes a culture of integrity by setting an example of professional ethics and supports the formation and implementation of ethical values, responsible behaviours 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 relevant 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 field of foreign exchange, money markets and derivatives. The Code includes market procedures and practices and reflects the standards of integrity and professionalism recommended for all participants in global financial markets, in order to maintain these markets within an orderly and efficient framework through the use of common language and trading and communication rules.

***The code of ethical conduct for internal auditors*** includes principles relevant to the internal audit profession and practice, as well as rules of conduct describing the behaviour expected from internal auditors. The purpose of the Code of Ethics is to promote a culture based on ethics within the internal audit profession.

***The code regarding the ethical conduct of Compliance Directorate personnel*** 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 carrying out the profession.

Within the Bank, ethical principles, moral integrity and professional and transparent behaviour are promoted through the knowledge and observance by all employees of the provisions of the Code of Ethics of Exim Banca Românească personnel, employee awareness regarding the legal consequences of bribery, methods of recognition and reporting obligations, and the identification and management of conflicts of interest in accordance with the Policy regarding the management of conflicts of interest within the Bank.

Through its strategy and implemented 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 (which enables stakeholders to understand the organization's actions and decisions and assess them objectively). Employee involvement is reflected both in customer relations (identifying sustainable financing opportunities, promoting products and providing sustainability consultancy) and in the use of the Bank's resources (recycling, energy consumption, paper, waste, etc.).

At the same time, throughout 2025, the Bank collaborated with other entities interested in sustainability (consulting firms), a process that contributed to the exchange of best practices and to increasing the positive impact on the Bank's activities. By organizing training sessions or awareness programmes, the organization contributes to the development of an environmentally responsible mindset and to increasing employee involvement in sustainable practices.

Members of the management body of Exim Banca Românească possess adequate professional knowledge, good reputation, honesty, integrity and independent thinking, regardless of the duties and responsibilities associated with the respective position, including the capacity held within the management body and within the support committees of the management body, and including aspects related to the code of conduct.

The annual professional training plan forms the basis for defining and implementing training programmes, with objectives established both for the development of professional competencies and business development, as well as for compliance with legal requirements in this area and corporate governance requirements, including business conduct. Chapter 7.3.1.2.2 details the elements regarding training and skills development at Bank level.

Chapter 7.4.1.4 identified the Bank structures exposed to personnel-level risk; however, all employees, as well as members of the management body, must be aware of and comply with its provisions, and any deviation from the provisions of the codes constitutes a disciplinary breach and, consequently, the disciplinary procedure shall apply (G1-1\_02, G1, G1-1, 10a).

The disciplinary sanctions that may be imposed by the Bank, through the disciplinary committees, are the following:

- a) Written warning;
- b) Demotion from position, with the granting of the salary corresponding to the position to which the employee has been demoted, for a period not exceeding 60 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 the case may be, the management allowance by 5-10% for a period of 1-3 months;
- e) Disciplinary termination of the individual employment contract.

In order to promote an organisational environment based on fairness and on the professional and ethical conduct of employees, instruments have been established to mitigate risks related to conflicts of interest, fraud and corruption (G1.GOV-1\_02, G1, G1.GOV-1, 5a):

- *Policy on the Management of Conflicts of Interest within Exim Banca Românească,*
- *Anti-Fraud Policy,*
- *Policy on Combating Bribery in the Field of Officially Supported Export Credits,*
- *Internal/External Whistleblowing Channel within Exim Banca Românească,*
- *Policy on Transparency and Disclosure Requirements.*

#### 7.4.1.2 Protection of whistleblowers

In application of 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 of National Bank of Romania Regulation No. 5/2013 on prudential requirements for credit institutions, Exim Banca Românească implemented the **whistleblowing channel ("Whistleblowing")** (G1-1\_08, G1, G1-1, 10d), an internal/external reporting mechanism to be used for reporting actual or potential breaches of internal/legal provisions that have occurred or are likely to occur.

Any legitimate concern, fear or identified irregularity may be reported internally verbally or, where appropriate, in writing, as well as anonymously, at the employee's discretion, as follows:

1. In writing - through the postal system, at the address: 3 Ion Mincu Street, District 1, Bucharest;
2. Through the electronic channel – through the IT system, at the email address [alertare@eximbank.ro](mailto:alertare@eximbank.ro);
3. Through any other electronic means capable of ensuring the transmission of text or audio messages.

Persons who have reported potential or actual breaches receive, where possible (e.g. the report was not submitted anonymously), confirmation of receipt of the information within no more than 7 calendar days from its receipt.

The compliance function ensures the receipt, centralization, investigation and reporting of alerts, while maintaining the confidentiality of the identity of the employee who exercised the right to internal reporting and protecting their personal data. Where the right to internal reporting concerns legitimate and substantial concerns related to activities carried out by compliance function personnel, the right to report shall be exercised directly to the Executive President of the Bank.

#### 7.4.1.3 Supplier relationship management, including payment practices – G1-2, G1-6

Within the Bank, the overall management of procurement activities is the responsibility of a specialized directorate, except for certain specific categories. Thus, legal services, human resources and marketing and advertising activities fall under the coordination of their respective directorates.

Each of these structures is responsible for managing all aspects related to the procurement of products and services. They apply due diligence to ensure that all procurements are carried out in accordance with the law and protect the interests of the Bank. The specialized directorate managing procurement activities is responsible for defining procurement policies and procedures and for implementing them, continuously adapting them to the organization's needs. The terms of reference constitute the documents through which the Bank informs suppliers about requirements regarding ethics, transparency, compliance with payment deadlines, confidentiality and intellectual property rights. In addition, they establish the Bank's expectations regarding compliance with fundamental labour principles, environmental protection and business ethics.

An essential 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 procurement of new goods or services, the Bank requires obtaining a conflict of interest opinion in accordance with the provisions of the Policy regarding the management of conflicts of interest, thus ensuring transparency of the procurement process and the prevention of reputational risks.

The Bank's suppliers are required to comply with the business continuity principle, 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 subsequently integrated into the contractual terms. At the same time, the Bank actively promotes sustainability principles in its relationship with suppliers, addressing two main directions: the gradual integration of ESG criteria into the selection process for new suppliers and the collection of additional information regarding the sustainability commitments of existing suppliers. Thus, the Bank gradually implements ESG assessments as part of current risk assessments for major suppliers of products and services.

For supplier selection and verification, the Bank requires ISO 9001 and ISO 45001 certifications, while holding ISO 14001 and ISO 20400 certifications constitutes a qualitative assessment criterion. In addition, factors such as the energy efficiency of products, the existence of a recycling policy, compliance with labour and employee health conditions and involvement in social responsibility and environmental protection activities are essential in the selection and contracting process.

The Bank has established clear standards in areas such as human rights, labour conditions, environmental and climate protection, corruption prevention and unacceptable behaviours, including human rights violations and involvement in bribery, corruption and fraud. It is also essential for the Bank's suppliers to comply with applicable national legislation. These standards were implemented in order to reduce risks associated with the Bank's value chain. Suppliers' ability to undertake and implement these commitments represents an essential criterion in assessing business relationships.

In 2025, there were no significant changes in the localization of the Bank's supplier chain.

The Bank applies the same standards both for the selection of new suppliers and for maintaining relationships with existing suppliers. Using a risk-based approach, the Bank continuously monitors supplier compliance, including that of their subcontractors, with the responsible procurement policy.

In 2025, the Bank carried out 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 regulations, it will initiate a dialogue in order 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 not effective, the Bank will reassess the future of the collaboration and may decide to reduce, suspend or terminate it.

The Bank's procurement activity also takes into account the concern to promptly receive works and purchases and to make timely payments to all parties involved.

The Bank undertakes to comply with the general procurement principles established through the internal procedure and to ensure clarity and compliance with contractual conditions. At the same time, it requires suppliers to comply with environmental regulations, to hold the aforementioned valid ISO certifications 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 throughout the life cycle of the products and services supplied are encouraged.

### **Payment practices**

The Bank has an internal procedure regulating, among other things, payment practices in relation to suppliers, approved at executive management level. This procedure is applied to all categories of suppliers, without differentiating according to their size.

Payment of invoices on behalf of the Bank is made at maturity, in accordance with the invoice issuance conditions established by suppliers. On average, payment terms are approximately 30 business days.

The Bank pays invoices on time and there are no legal 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 (CVM, GRECO, UNCAC, RAI).

In carrying out activities and in relations with Bank personnel, customers or collaborators, it is prohibited to conclude transactions/process contracts on behalf of the Bank through bribery, acceptance of bribes or other acts of corruption.

The Bank has a zero-tolerance policy towards any acts of corruption, condemns corruption in all its forms and firmly expresses its commitment to continue anti-corruption efforts through appropriate legal means, with a view to implementing anti-corruption measures ensuring effective control over the Bank's activity.

The implementation of the Anti-Corruption Strategy implies that all employees and members of the Bank's management body, as well as all persons and entities entering into business relationships with the Bank or its subsidiaries (customers, suppliers, agents, etc.), are aware of, understand and comply with the commitment regarding the prevention and combating of corruption and will conduct themselves in accordance with ethical standards, applicable legislation and contracts applicable to the parties.

The Bank encourages ethical, impartial and non-discriminatory behaviour towards all stakeholders. In order to achieve this objective, the Bank has implemented the Code of Ethics of Exim Banca Românească personnel, 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 ensure that the public interest prevails over any private interest, in compliance with the principle of transparency of the decision-making process and unrestricted access to information of public interest.

The Bank ensures the premises for continuous training and testing for all personnel (100%), by providing a web application specifically created for ongoing training needs.

In this regard, the Bank structures exposed to the risk of conflicts of interest and corruption, in all its forms, at personnel level have been identified.

a) At business line level

This category includes personnel managing relationships with the Bank's customers. Direct interaction with customers increases the possibility of conflicts of interest arising; therefore, special attention must be paid to this category of personnel. Customer advisory, negotiation, submission of offers, approvals at business line level or contract conclusion activities must be carried out with due diligence, always pursuing the interests of the Bank. In carrying out these activities, it is prohibited to receive gifts or other benefits from customers, as well as to assume excessive risks or breach internal regulations in order to achieve established objectives.

b) At support function level

The level of exposure to the possibility of conflicts of interest arising within this organizational level varies significantly depending on the specific nature of the activities and the level of competence held by each structure.

c) At internal control function level

Personnel with internal control functions (Audit, Risk and Compliance) are prohibited from using, for personal benefit or for the benefit of third parties, information obtained from carrying out specific activities. Independent internal control functions are organizationally separated from the activities assigned for monitoring 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 according to the Bank's specific activities:

- establishing control methods, such as cross-checks and higher authorization levels for certain operations;
- exercising, according to competencies, internal control in order to efficiently manage fraud risk associated with specific activities, through the involvement of managers of organizational structures;
- verification of suppliers of products and services and ensuring a procurement process that complies with the principles of equal treatment, non-discrimination, proportionality and mutual recognition;
- implementation of an internal/external reporting mechanism to be used within the Bank for reporting actual or potential breaches 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

Periodic personnel training and instruction represent an essential instrument for preventing acts of corruption by increasing employee awareness regarding 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 CARE Romania, as well as the sanctions applicable in the event of their occurrence.

Periodically, at least once a year, Bank employees participate in internal awareness programmes covering topics such as the anti-corruption strategy, internal/external whistleblowing rights, identification, management and reporting of conflicts of interest, internal/external fraud, compliance with the provisions of the Code of Ethics of personnel, as well as customer complaint management. (G1-3\_06, G1, G1-3, 21a)

#### 7.4.1.4.3 Prevention

The main instruments through which Exim Banca Românească ensures the prevention of corruption are: a rigorously designed management framework based on sound governance principles and a transparent environment in relation to stakeholders. The measures identified by the management body – as remedies for institutional corruption risks and vulnerabilities – are included in the *Integrity Plan*.

The Bank adopts a series of actions and measures in order to prevent acts of corruption, such as:

- Promoting an anti-fraud organizational culture through:
  - Knowledge and compliance with the provisions of the Code of Ethics;
  - Raising employee awareness regarding fraud identification methods, types of fraud, reporting obligations and legal consequences, through training sessions conducted both upon hiring and periodically, according to the annual training plan;

- Appropriate allocation of responsibilities, competencies and objectives. Employees are assigned achievable objectives so that, in fulfilling them, personnel behave ethically and in accordance with internal regulations and applicable legislation;
- Promoting a culture of avoiding conflicts of interest, so that members of the management body and employees, in performing their duties and responsibilities, act in the interest of the institution without pursuing personal, financial or other interests in carrying out their duties and without using the prerogatives of their position to obtain undue benefits for themselves, their families or related persons;
- Promoting the principle of moral integrity among personnel, both through the application of recruitment methods aimed at preventing the hiring of individuals with criminal connections and through encouraging professional conduct in line with high ethical and professional standards;
- Informing exporters and commercial banks and obtaining their declarations, within the officially supported export credit activity, regarding the legal consequences of bribery involving Romanian and foreign public officials and the private sector;
- Non-discriminatory application of disciplinary sanctions for breaches of internal regulations.

#### 7.4.1.4.4 Incidents

The Bank's management is informed about any potential or actual/real acts of corruption occurring within the organization that may be or are generated and identified as a result of:

- Conflicts of interest;
- Non-compliance with the provisions of the Code of Ethics of personnel;
- The internal whistleblowing channel ("whistleblowing");
- Customer complaints.

In addition, within the quarterly activity reports, the compliance function informs the institution's management body regarding identified incidents and the measures implemented to mitigate the risks generated by them.

During 2024–2025, no incidents were reported and no fines related to acts of corruption involving employees or members of the Bank's management bodies were imposed.

## 7.5 Sustainability Aspects Related to Exim Banca Românească's Activity Conducted in the Name and on Behalf of the State (NCS)

### 7.5.1 Roles and Responsibilities of Governance Bodies in Overseeing the Management of Material Impacts, Risks and Opportunities GOV- 1 NCS

The general framework for assessing sustainability risks within the NCS activity is approved by the Interministerial Committee for Financing, Guarantees and Insurance (CIFGA), the decision-making body regarding all NCS activities, in accordance with the provisions of *Law no. 96/2000, republished, as subsequently amended and supplemented, and Government Decision no. 534/2007 regarding the establishment, responsibilities, competencies and functioning of the Interministerial Committee for Financing, Guarantees and Insurance and the regulation of financing, guarantee and insurance operations carried out by the Export-Import Bank of Romania EXIMBANK - S.A. in the name and on behalf of the state, as subsequently amended and supplemented.*

For the activity carried out as Romania's Export Credit Agency (ECA), Exim Banca Românească NCS has established a sustainability risk management framework through the application of specific rules developed at the level of the Organisation for Economic Co-operation and Development (OECD), transposed through legally binding acts within the European Union, respectively through *Regulation (EU) No. 1233/2011 of the European Parliament and of the Council of 16 November 2011 on the application of certain guidelines in the field of officially supported export credits and repealing Decisions 2001/76/EC and 2001/77/EC*, as well as subsequent delegated acts.

Sustainability-related risks are integrated into the internal policies and procedures of Exim Banca Românească NCS, in its capacity as an ECA export credit agency, regarding sustainable development, assessment of environmental/climate and social impact in the destination country, responsible business conduct and sustainable financing of exports, Romanian investments abroad and international transactions. Sustainability-related risks are considered within the specific financing, guarantee and insurance activity both at individual transaction level and at portfolio level.

Exim Banca Românească NCS annually informs CIFGA regarding the results of project assessments from the perspective of environmental/climate and social impact in the destination country and responsible business conduct, with respect to:

- the number and type of projects assessed from an ESG perspective, the stage of fulfilment of the agreed conditions and measures for projects classified in categories A and B, as a result of the individual monitoring of supported transactions/projects, as well as proposals for revising/completing the policies and procedures regarding social and environmental impact, in order to ensure the effectiveness of their implementation and alignment with national/international standards and practices in the field;
- description of officially supported transactions for which measures and actions were applied for the prevention, identification and reporting of bribery involving public officials and the private sector, as well as possible proposals for revising/completing anti-bribery policies and procedures, in order to ensure the effectiveness of their implementation and alignment with national/international standards and practices in the field.

In addition, pursuant to *Regulation (EU) No. 1233/2011 on the application of certain guidelines in the field of officially supported export credits*, Exim Banca Românească, in its capacity as an ECA export credit agency, annually reports to the Council of the European Union, while informing the Interministerial Committee for Financing, Guarantees and Insurance, detailed information regarding the methodology for assessing, verifying and monitoring transactions supported in the name and on behalf of the state with regard to:

- the environmental impact in the export destination country;
- the social impact and compliance with human rights in the export destination country;
- the adoption of policies contributing to the fulfilment of commitments assumed by Romania as a signatory to the *Paris Agreement on climate change*.

In order to ensure transparency towards stakeholders and fulfil the responsibilities incumbent upon Exim Banca Românească NCS in its capacity as an ECA export credit agency in the context of the OECD accession process, the text of the OECD legal instruments applicable to officially supported export credit activities and the subsequent policies approved by the Interministerial Committee for Financing, Guarantees and Insurance have been published on the website [www.eximbank.ro](http://www.eximbank.ro).

At the same time, for the entire portfolio, efforts were made to improve the capacity to process applications and increase efficiency in their assessment through:

- reviewing and simplifying workflows as a result of acquired best practices;
- development, streamlining and digitalization of processes and products.

### 7.5.2 Key Elements of the Business Model and Value Chain SBM – 1 NCS

Following the operationalization of the Investment and Development Bank (IDB), starting from 30.09.2025, the mandate of Exim Banca Românească in the name and on behalf of the state (NCS) was amended in order to strengthen the activities carried out in its capacity as Romania's *Export Credit Agency (ECA)* through specific financing, guarantee and insurance instruments supporting exports, Romanian investments abroad and international transactions. The portfolio of financing and guarantee instruments issued in the name and on behalf of the state and existing in the portfolio as at 30.09.2025 will continue to be administered until their maturity, in accordance with an *Administration Methodology* approved by the Government of Romania. Export Credit Agency (ECA) operations conducted in the name and on behalf of the state will continue for an indefinite period.

*Coordinates of the activity conducted by Exim Banca Românească in the name and on behalf of the state from the perspective of sustainable development objectives. Policies adopted for managing material sustainability matters MDR – P NCS*

In order to manage sustainability matters in line with the international commitments undertaken during Romania's OECD accession process, Exim Banca Românească NCS has developed **Policies and working tools** for risk assessment (questionnaires), transparently published on the external website for the purpose of involving existing/potential clients in their implementation throughout the entire business relationship, as well as to fulfil transparency requirements necessary in the context of the OECD accession process. These policies, together with the related working procedures, apply to all export financing, guarantee and insurance applications, foreign investment and international transaction requests, regardless of the risk exposure period, destination country or type of product.

**1. The Exim Banca Românească NCS Sustainable Development Policy** – pursuant to which sustainable development objectives are integrated into all financing, guarantee and insurance activities carried out by Exim Banca Românească NCS in its capacity as an ECA export credit agency.

*The Exim Banca Românească NCS Sustainable Development Policy* is intended to be a continuously evolving document, both formally and substantively, depending on the implementation timeline of various environmental and climate objectives undertaken by Romania at international level, as well as on the possibility that these objectives may change in the future.

Similar to other European institutions involved in officially supported export credits and international transactions, the coordinates considered in drafting the Policy, as well as the proposed Objectives, are aligned with the principles and objectives undertaken at national level through programmatic 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 Taxonomy adopted by the European Union,
- „Fit for 55”,
- The EU Action Plan: Financing Sustainable Growth, etc.

Within its activity as an ECA export credit agency, Exim Banca Românească NCS acts based on the following coordinates:

- a. Prioritising the allocation of state funds to sustainable export and internationalisation projects;
- b. Managing financial risks arising from climate change, resource depletion, environmental degradation and social matters on international markets;
- c. Promoting transparency and a long-term vision regarding support for exports, foreign investments and international transactions.

**2. Policy on Environmental and Social Impact in the Field of Officially Supported Export Credits** – *Annex 1 to the Exim Banca Românească NCS Sustainable Development Policy*, developed by Exim Banca Românească NCS, in its capacity as an ECA export credit agency, based on the *OECD Recommendation on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence*, adopts a set of measures aimed at assessing environmental and social impact in the case of officially supported export credits with a repayment period longer than 2 years.

The European Union legislative framework (*EU Regulation No. 1233/2011 and subsequent delegated acts*) requires EU Member States to apply the principles and guidelines established by the *OECD Arrangement on Officially Supported Export Credits* and the recommendations issued by the OECD Council in the field of export credits.

The environmental and social impact assessment process forms an integral part of the assessment process for all financing/guarantee/insurance applications, within the context of evaluating all categories of risks associated with the respective transaction, with the ultimate objective of substantiating the proposal for approval of the official support instrument for the export transaction.

The parties involved in the project are required to provide all information necessary for Exim Banca Românească NCS to perform a proper assessment.

Within the project impact assessment process, sustainability-related risks and sustainability factors provided for in the *Exim Banca Românească NCS Sustainable Development Policy* are taken into consideration.

Furthermore, through the Policy, a complaint resolution mechanism has been implemented, pursuant to which any client, group, community, entity or any other interested or affected party, or party potentially affected by one or more actions of Exim Banca Românească NCS in its capacity as ECA, may submit complaints in writing to the dedicated email address: [dezvoltaredurabila@eximbank.ro](mailto:dezvoltaredurabila@eximbank.ro), with the complaint to be resolved within a maximum of 30 calendar days from receipt thereof.

During 2025, no complaints or claims were recorded regarding the support provided by Exim Banca Românească, in its capacity as an export credit agency, for export and internationalisation transactions.

**3. The Policy and Timeline for the Gradual Phase-Out of Support for Export Transactions in the Fossil Fuels Sector** were developed by Exim Banca Românească NCS, in its capacity as an export credit agency, based on the recommendations included in the *EU Council Conclusions on Climate Finance* dated 05.10.2021, the *EU Council Conclusions on International Climate Finance* dated 12.12.2023, and the commitment undertaken by the EU

through the *OECD Climate Change Sector Understanding (CCSU)*, an integral part of the *OECD Arrangement on Officially Supported Export Credits*.

In the context of the ongoing effort to align with international approaches to combating climate change and with reference to the objectives and commitments undertaken by Romania under *Romania's Sustainable Development Strategy 2030*, approved by Government Decision no. 877/2018, and the *Integrated National Energy and Climate Plan (INECP) for the period 2021–2030*, approved by Government Decision no. 1076/2021, the Policy provides for a gradual phase-out of support for export projects in the fossil fuels sector, thereby contributing to Romania's climate change mitigation objectives, as follows:

**i). Starting from 28.12.2021**, Exim Banca Românească NCS, in its capacity as an export credit agency, no longer provides financing, guarantee or insurance products for:

a) the export of new coal-fired electricity generation plants, or parts thereof, including all components, equipment, materials and services (including staff training) directly necessary for the construction and commissioning of such power plants. The addition of a new coal-fired electricity generation unit to an existing plant is considered a new coal-fired electricity generation plant;

b) the export supply of equipment to existing coal-fired electricity generation plants, except where the following conditions are cumulatively met:

- the purpose of the supplied equipment is to reduce air pollution, reduce water pollution or reduce CO<sub>2</sub> emissions;
- the supplied equipment does not result either in an extension of the useful life of the installation or an increase in capacity.

The restrictions referred to above do not apply to coal-fired electricity generation plants operating with effective *Carbon Capture, Utilisation and Storage (CCUS)* installations or to the upgrading of existing coal-fired power plants for the installation of CCUS.

**ii). During the 2032-2050 horizon:**

Given that the transition towards a low-carbon energy system requires, at a minimum, support for investment initiatives ensuring the proper functioning of existing energy systems in the short and medium term, for the security of supply of primary energy resources and the secure operation of infrastructure transporting such resources, until the relevance of hydrocarbons declines relative to green alternatives:

**a. Starting from 01.01.2032**, Exim Banca Românească NCS will no longer provide officially supported export credit products in the name and on behalf of the state for projects involving exploration, production, transportation, storage, refining and distribution of fossil fuels (coal, oil), as well as for energy generation projects using *unabated* methods.

**b. Starting from 01.01.2050**, Exim Banca Românească NCS will no longer provide officially supported export credit products in the name and on behalf of the state for projects involving exploration, production, transportation, storage, refining and distribution of fossil fuels (gas), as well as for energy generation projects using *unabated* methods.

During 2025, Exim Banca Românească, in its capacity as ECA, did not provide official support in the name and on behalf of the state for projects in the fossil fuels sector (coal, oil, gas).

**4. The General Procedure regarding the assessment of environmental and social impact of projects benefiting from official support from Exim Banca Românească in the name and on behalf of the state, in its capacity as an export credit agency**, describes the specific stages of the assessment process for applications for official support of export credits from the perspective of environmental and social impact in the destination country of the export or foreign capital investment.

The selection, classification, analysis and assessment process is carried out for all applications regarding export credit financing/guarantees/insurance, foreign investments and international transactions, according to the following coordinates:

- **Selection** – consisting of collecting information regarding the nature of the export transaction/project, with the purpose of identifying projects that will be subject to classification and actual environmental and social impact assessment.

• **Classification** – in accordance with the categories provided under the *OECD Arrangement on Officially Supported Export Credits*:

- **Category A** – where an export project is considered likely to have significant adverse environmental and/or social impacts, with substantial, irreversible and unprecedented effects, potentially affecting areas larger than the project site or infrastructure where the works are carried out. Category A generally includes projects in sensitive sectors or projects located in or near sensitive areas.

- **Category B** – where environmental and/or social impacts are considered less severe than those of Category A projects. Generally, such impacts are more limited, site-specific, rarely irreversible, and mitigation measures are more readily available.

- **Category C** – where a project is considered to generate minimal effects or to have no potential environmental and/or social impact.

• **Analysis** – aimed at assessing the extent to which the project complies with relevant requirements imposed by applicable international standards and the manner in which measures for prevention, reduction, mitigation or remediation of adverse effects are implemented, both from the perspective of Exim Banca Românească NCS's level of involvement, in its capacity as an export credit agency, in the implementation of the project, and from the perspective of the project's characteristics and complexity.

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

a) compliance with environmental and social standards in the export destination country;

b) benchmarking the project's environmental and social performance against the relevant aspects of the 8 IFC Performance Standards (*IFC PS*);

c) benchmarking against the relevant aspects of the *World Bank's 10 Environmental and Social Standards (WB ESS)* in the case of projects involving public borrowers;

d) benchmarking against the relevant aspects of the *World Bank Environmental, Health and Safety Guidelines (EHS Guidelines)* – correlated with the relevant aspects applicable to the supported transaction/project.

In the absence of *EHS Guidelines* for the relevant sector, reference is made to:

- relevant aspects of any internationally recognised sectoral or domain-specific standards, such as, where applicable, the Convention on Nuclear Safety, the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, and the relevant standards of the International Atomic Energy Agency (IAEA) for nuclear power plants and other nuclear facilities; and/or

- relevant international guidance such as, where applicable, the Hydropower Sustainability Assessment Protocol and the Core Values and Strategic Priorities of the World Commission on Dams (WCD) for hydropower projects, World Organisation for Animal Health (OIE) standards for animal welfare matters, and any other relevant IFC publications, such as *Good Practice Notes*;

- relevant aspects of the *Guiding Principles on Business and Human Rights (UNGPR)*, taking into consideration measures necessary to prevent, reduce, mitigate or remedy adverse impacts and/or improve environmental and social performance, depending on the size of the relevant parties involved in the project, the operational context, the nature and scope of the potential adverse impact, the international standards applied to the project and the significance of the support provided by Exim Banca Românească NCS within the overall project.

Depending on the characteristics of the project for which official support is requested, in addition to environmental and social impact assessment, Exim Banca Românească NCS also monitors the potential impact of project implementation and execution on compliance with human rights in the export destination country, taking into account the following key factors:

- land acquisition;
- physical relocation;
- economic displacement;
- affected communities, including informal consultation and participation processes, grievance mechanisms, etc.;
- physical integrity and personal security;
- indigenous populations, including prior informed consent processes;
- vulnerable groups;
- community exposure to diseases;

- gender issues;
- child labour;
- forced labour;
- discrimination;
- workers' accommodation;
- use of security personnel;
- occupational and societal safety;
- freedom of association and collective bargaining;
- abusive contracts;
- grievance mechanisms;
- animal welfare issues;
- supply chain issues;
- the potential positive impact of projects.
- **Assessment** – is carried out taking into consideration the specific characteristics of the country/region/sector in which the project is implemented and the manner in which the applicant/project sponsor has responded to specific requirements related to human rights compliance.

Exim Banca Românească NCS exercises the highest level of diligence in assessing the environmental impact of export transactions and foreign investments, adverse climate effects, and the impact of exports on local communities in the destination country, in order to avoid involvement in projects where there are suspicions of forced labour, child labour or projects where there are suspicions of discrimination on any grounds.

During the assessment stage, Exim Banca Românească NCS takes into account any relevant information from public sources (corporate social responsibility reports, websites such as Amnesty International, Human Rights Watch, etc.), as well as any information regarding the ratification by export destination countries of Human Rights Conventions ([www.ilo.org](http://www.ilo.org)).

Exim Banca Românească NCS, acting as an export credit agency, may propose rejecting support for a transaction carried out in the name and on behalf of the state if, during the assessment process, it determines that:

- the project/activities covered by the export contract may have a negative environmental, climate or social impact and no measures enabling compliance solutions in the destination country could be identified;
- the project does not comply with the laws and regulations of the destination country and no measures enabling compliance solutions could be identified;
- the application does not comply with the international reference standards used for assessment and no measures enabling compliance solutions could be identified.

Throughout the implementation of transactions, Exim Banca Românească, acting as an export credit agency, diligently monitors the implementation of projects classified under Categories A and B, both during construction and during their operational implementation phase.

Where the monitoring process identifies compliance deficiencies with the terms and conditions of the approved official support and no mitigating measures can be identified to address the risks found, Exim Banca Românească NCS may propose rejection of applications for the requested products, rejection of compensation claims, suspension of official support or termination of the commitments undertaken.

#### **Requirements regarding transparency and disclosure**

Considering the implications of officially supported projects carried out in the name and on behalf of the state and classified under Categories A and B from the perspective of ensuring sustainability at a global level, the Exim Banca Românească NCS procedure includes transparency requirements applicable to all export credit agencies within OECD member states, consisting of publishing relevant information on the Bank's website:

- Working tools for sustainability risk assessment, such as indicative lists, assessment standards and questionnaires designed to involve existing/potential clients in implementing sustainability requirements within international transactions supported by the Romanian state through Exim Banca Românească acting as ECA, throughout the entire business relationship:

- Illustrative list of Category A projects,
  - IFC assessment standards,
  - World Bank assessment standards,
  - Guidance content regarding environmental and social impact assessment reports,
  - Questionnaire regarding the environmental and social impact of exports.
- Relevant information regarding projects classified under Category A and Category B:
- Prior to approval of the commitment (ex ante) – for Category A projects,
  - After approval of the commitment (ex post) – for all Category A and Category B projects.

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 governing body.

Information regarding the monitoring of experience gained through the implementation of the environmental and social impact assessment process and ensuring ex-post transparency regarding transactions classified under Categories A and B is included in the annual portfolio report of the State Name and Account Financing, Guarantees and Insurance Division, submitted for information purposes to the Interministerial Committee for Financing, Guarantees and Insurance (CIFGA).

During 2025, no requests for official support were recorded for projects meeting the classification criteria for Category A or Category B.

#### **5. Exim Banca Românească NCS Policy on Combating Bribery in the Area of Officially Supported Export Credits**

As Romania's export credit agency and in accordance with the provisions of the *OECD Arrangement on Officially Supported Export Credits and the OECD Council Recommendations on Bribery and Officially Supported Export Credits*, Exim Banca Românească supports and promotes responsible business conduct in international business activities, emphasizing the need for joint efforts to identify, prevent and combat corruption in the implementation of international commercial transactions, by establishing specific principles and measures aimed at:

- increasing awareness among Romanian exporters and other parties involved in export transactions regarding the legal implications of bribery in international transactions, both involving foreign and Romanian public officials, as well as in the private sector, for the purpose of facilitating the conclusion of export contracts;
- preventing Exim Banca Românească NCS from becoming involved in the official support of export transactions concluded as a result of bribery involving Romanian and foreign public officials, as well as bribery in the private sector;
- identifying and reporting such acts of corruption to the competent authorities in order to establish appropriate measures in accordance with applicable national legislation.

#### **Transparency and disclosure requirements**

Considering the implications of officially supporting export projects in the name and on behalf of the state from the perspective of ensuring responsible business conduct globally, the Exim Banca Românească NCS procedure includes transparency requirements applicable to all export credit agencies from OECD member states, consisting of publishing relevant information on the Bank's official website.

The working tools for assessing sustainability risks and responsible business conduct, including indicative lists, assessment standards and questionnaires designed to involve existing and potential clients in implementing sustainability requirements in international transactions supported by the Romanian state through Exim Banca Românească acting as ECA throughout the business relationship, include:

- Export Transaction Declaration;
  - Exclusion lists of multilateral financial institutions (World Bank, African Development Bank Group, Asian Development Bank, European Bank for Reconstruction and Development, Inter-American Development Bank).
- Exim Banca Românească promotes responsible business conduct among all parties involved in applications for official support of export credits, foreign investments and international transactions. In this regard, Exim Banca Românească NCS:
- informs exporters and, where applicable, other relevant parties about the legal consequences of bribery in international commercial transactions in accordance with Romanian legislation, including provisions relating to bribery of foreign and Romanian public officials, as well as bribery in the private sector;

- encourages exporters and other relevant parties, where applicable, to develop, implement and document appropriate control systems designed to prevent and detect bribery;
- encourages exporters to increase awareness that parties involved in international commercial transactions must also comply with and observe all relevant laws and regulations prohibiting bribery in the state or jurisdiction in which they operate and in the country or jurisdiction where the project is or will be implemented.

**6. The General Procedure on Combating Bribery in the Area of Officially Supported Export Credits Provided by Exim Banca Românească in the Name and on Behalf of the State, acting as an export credit agency,** describes the operational workflow, measures and actions undertaken by Exim Banca Românească NCS within its official export credit support activities for the prevention, identification and reporting of bribery involving both foreign public officials and the private sector.

As part of the analysis process, all export credit financing/guarantee/insurance applications received by Exim Banca Românească NCS are subject to an initial assessment based on information received from any party involved in the application, for the purpose of identifying potential risks associated with bribery related to the conclusion and/or execution of the export contract. Risk assessment is carried out progressively, beginning with the first information obtained regarding the application and continuing with the documentation/information gathered throughout the analysis process.

Where, based on the information obtained, it results that:

- in the last five years, one of the parties involved in the transaction has been convicted for violating anti-bribery laws, has been subject to equivalent measures, or has been mentioned/found involved in bribery acts through a public ruling issued by an arbitration court;
- there are indications from any source of information (adverse information obtained from any parties involved in the transaction, media sources, competitors, public institution websites, NGOs, whistleblowing channels, etc.) regarding the involvement of the exporter/the Bank/representatives/agents in bribery, including in relation to the export contract that is the subject of the request for official support by Exim Banca Românească, or other adverse information regarding investigation/criminal prosecution files;
- Exim Banca Românească NCS has reasons to believe that the export transaction could involve bribery or considers it necessary to obtain additional information in order to eliminate any suspicion regarding such acts,

**Exim Banca Românească NCS may apply additional assessment measures,** which may also consider information and public reports provided by the National Contact Point responsible for implementing the *OECD Guidelines for Multinational Enterprises*.

In order to ensure alignment with the National Contact Point for Responsible Business Conduct in accordance with OECD requirements, under Government Decision No. 1430/2024, Exim Banca Românească was included among the permanent invitees to its meetings.

Exim Banca Românească NCS refuses to grant official support in its capacity as an Export Credit Agency (ECA) and informs the authorities responsible for investigating and legally prosecuting corruption-related offenses if the analysis reveals that:

- there is credible information/evidence that bribery was involved in the award or execution of the export contract;
- any of the parties involved in the transaction, or individuals or legal entities acting on their behalf (e.g., agents), are under criminal investigation or involved in various stages of criminal proceedings before courts for violations of anti-bribery legislation, regardless of the country in which such proceedings are conducted;
- the applicant for the facility appears on any sanctions lists including individuals/legal entities sanctioned for bribing foreign public officials.

Throughout the implementation of transactions, Exim Banca Românească, acting as an export credit agency, diligently monitors the business conduct of exporters. If suspicions arise regarding the commission of bribery offenses, as well as credible information/evidence indicating that the conclusion or execution of the export contract involved bribery, the competent authorities responsible for investigating and legally prosecuting bribery offenses shall be promptly informed.

A **Whistleblowing** alert mechanism has been implemented through internal procedures, allowing information or reasonable suspicions regarding the involvement of exporters/agents in bribery of public officials from any country or entities from the private sector to be reported, in relation to the awarding or execution of export contracts benefiting from official support provided by Exim Banca Românească acting as an export credit agency.

<sup>4</sup> The National Contact Point is managed by ARICE – the Romanian Agency for Investments and Foreign Trade, [pnc@investromania.gov.ro](mailto:pnc@investromania.gov.ro)

During 2025, Exim Banca Românească NCS, in its capacity as an export credit agency, organized together with the Ministry of Justice and the National Anticorruption Directorate a dedicated information session aimed at increasing awareness of OECD principles and recommendations regarding anti-corruption practices in international transactions and the promotion of responsible business conduct. The event facilitated an exchange of experience and best practices with authorities responsible for investigating and legally prosecuting corruption-related offenses in international transactions, with the purpose of strengthening Exim Banca Românească ECA's ability to identify and report credible suspicions.

During November 2025, personnel involved in activities carried out by Exim Banca Românească NCS in its role as an export credit agency received training and underwent assessment to ensure awareness of their responsibilities and of the applicable regulatory framework.

*During 2025, regarding applications for official export support provided by Exim Banca Românească in the name and on behalf of the state, no indications were identified that would require the completion of the analysis through additional assessment measures.*

**7. Policy on Sustainable Financing in the Area of Official Support for Export Credits** - aims to implement the *OECD Recommendations on Sustainable Lending Practices and Officially Supported Export Credits* within the activities carried out by Exim Banca Românească NCS, acting as an export credit agency, by establishing a set of principles and rules applicable to the official support of export credits granted to low-income countries.

As part of the analysis process for applications requesting official support for export transactions involving public debtors/state-guaranteed debtors from low-income countries, Exim Banca Românească NCS, acting as an ECA, verifies the status of the export destination country, specifically whether the country of the public debtor/state-guaranteed debtor appears on IMF/World Bank lists of countries subject to restrictions or conditions concerning commercial borrowing.

Where, based on the verifications performed:

- a) the debtor country appears on IMF/World Bank lists and/or restrictions/conditions are identified, Exim Banca Românească NCS will not continue the analysis of the request and will inform the applicant accordingly. Where information exists regarding negotiations initiated by the debtor country's authorities with the IMF/World Bank for the approval of specific programs or policies applicable to the transaction proposed for official support, upon the applicant's request, the analysis may be suspended until an official document is obtained from the IMF/World Bank;
- b) where the debtor country does not appear on IMF/World Bank lists and no restrictions are identified regarding public debt limits, in order to ensure ex-ante transparency in relation to the IMF/World Bank, as required by OECD standards, Exim Banca Românească NCS shall submit a notification to the IMF and the World Bank;
- c) for transactions exceeding SDR 5 million (or exceeding SDR 1 million in the case of very small countries with gross national income below USD 1 billion), Exim Banca Românească NCS requests the Ministry of Finance to contact the relevant authorities in the debtor country through official channels (e.g., Ministry of Finance, Treasury, etc.), requesting written confirmation that the project/expenditures related to the proposed transaction fall within the limits/conditions established by the IMF/World Bank.

To ensure transparency required by international rules and best practices, Exim Banca Românească NCS annually reports to the IMF and the World Bank, through the OECD Secretariat, all export transactions to low-income countries for which official export credit support instruments were granted.

*During 2025, no applications were received for export support, in the name and on behalf of the state, relating to export projects directed to low-income countries included on IMF/World Bank lists or to countries subject to restrictions/conditions regarding commercial borrowing.*

<sup>5</sup> (<https://www.imf.org/en/Topics/sovereign-debt/debt-limits-policy> - Countries Subject to IMF/World Bank Debt Limits Conditionality; <https://ida.worldbank.org/en/financing/debt/sustainable-development-finance-policy>)

### 7.5.3 Strategic Options in Activities Performed in the Name and on Behalf of the State from a Sustainability Perspective

Taking into account the objectives and commitments undertaken by Romania through the *Romania Sustainable Development Strategy 2030*, the *Integrated National Energy and Climate Plan (INECP) for 2021–2030*, as well as commitments at the level of the European Union and the *Organisation for Economic Co-operation and Development (OECD)* regarding officially supported export credits, Exim Banca Românească, acting in the name and on behalf of the state as an export credit agency, assesses all applications for financing, guarantee and insurance products from the perspective of their sustainability.

Accordingly, Exim Banca Românească NCS continues the strategic approach initiated in 2021, under which it does not provide products intended for the official support of export credits in the name and on behalf of the state for export contracts involving the development of coal-fired electricity generation plants or equipment intended for existing facilities. By the end of 2026, the Bank is expected to implement a carbon emissions calculation methodology, including a methodology for calculating the portfolio carbon footprint.

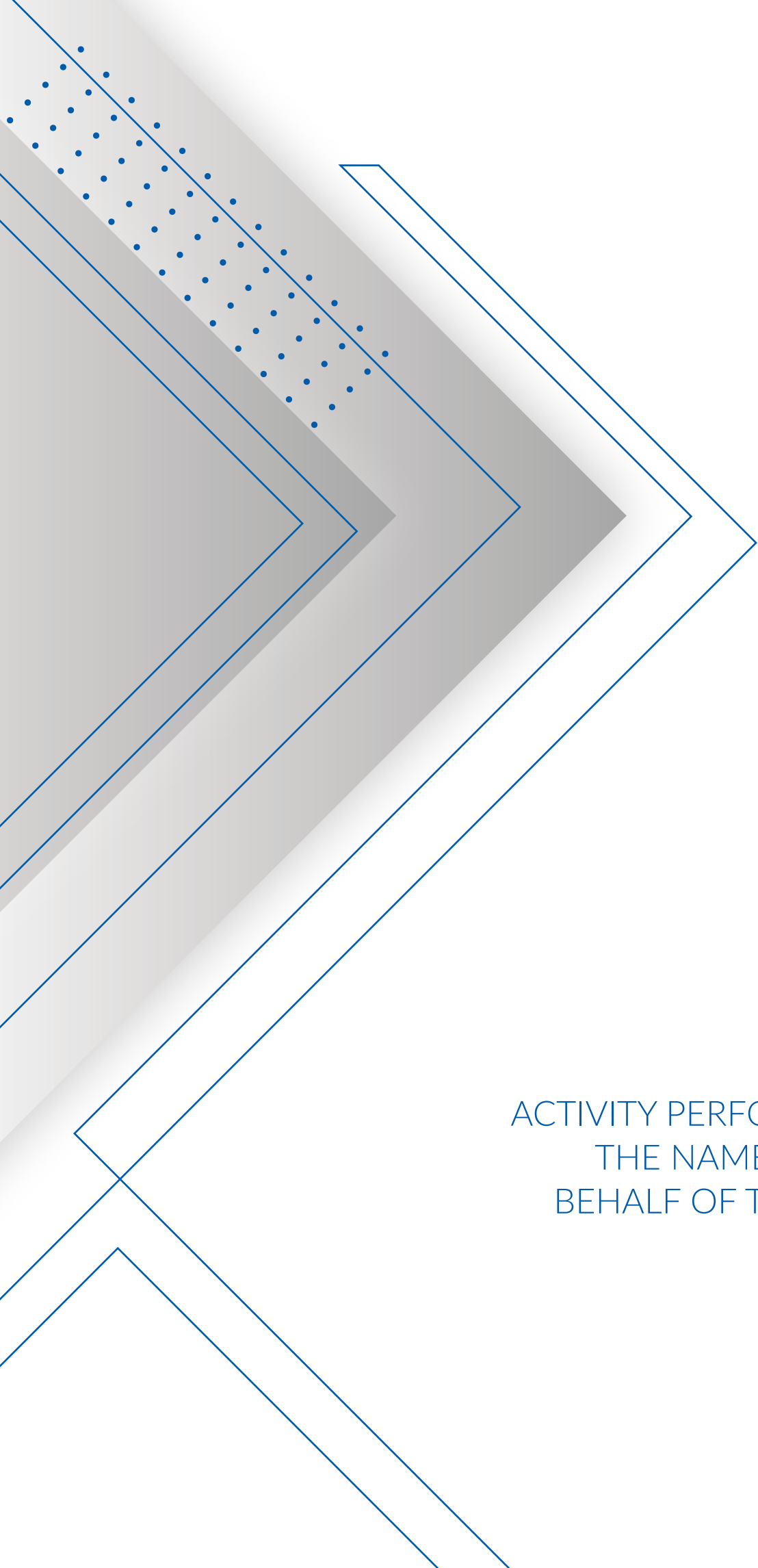
Subsequently, starting from 01.01.2032, Exim Banca Românească NCS will no longer grant products supporting export credits in the name and on behalf of the state for projects involving the exploration, production, transport, storage, refining and distribution of fossil fuels (coal and oil), as well as projects involving energy generation through unabated methods. Similar measures are expected to be applied to gaseous fuels by the 2050 horizon.

By the end of 2026, a methodology for calculating carbon emissions and a methodology for calculating the portfolio-level carbon footprint are expected to be implemented within ECA activities.

Taking into consideration the objectives and commitments undertaken by Exim Banca Românească through adherence to the *National Anti-Corruption Strategy*, as well as the principles set out in the *OECD Council Recommendation on Bribery and Officially Supported Export Credits*, Exim Banca Românească NCS will continue enhancing its internal capacity to recognize risk indicators for detecting transnational bribery risks, in line with OECD best practices across all export support and international transaction activities. The workflow of current activities will be supplemented by rapid procedures for transmitting relevant alerts to the *National Anticorruption Directorate (DNA)*.

Internal training sessions will be organized for personnel responsible for export credit support activities in order to systematically integrate the integrity dimension into analysis and decision-making processes. Through this approach, the focus shifts from isolated reaction measures to prevention and institutional vigilance, with Exim Banca Românească contributing to strengthening a functional and coherent national detection system.

Furthermore, Exim Banca Românească, acting as an export credit agency, will continue its efforts to increase awareness and promote a culture of integrity within the private sector by promoting responsible conduct in international business activities.



ACTIVITY PERFORMED IN  
THE NAME AND ON  
BEHALF OF THE STATE

## 8. ACTIVITY PERFORMED IN THE NAME AND ON BEHALF OF THE STATE

### 8.1 Operational Activity and Main Achievements 2025

Exim Banca Românească acts in line with its strategic mission of supporting the local economy and developing mechanisms enabling Romanian companies to sustain their businesses in a macroeconomic environment characterized by uncertainty at both regional and global levels, pursuant to Law No. 96/2000, republished, as subsequently amended and supplemented.

Starting from 30 September 2025, the main areas of activity carried out by Exim Banca Românească in the name and on behalf of the state (Exim Banca Românească NCS) are structured around the revised mandate introduced through amendments to Law No. 96/2000, as republished and subsequently amended and supplemented, as follows:

I. Activities carried out in the capacity of Export Credit Agency (“ECA”). Exim Banca Românească NCS – ECA undertakes the necessary actions to develop new financial instruments supporting export credits, international transactions, Romanian investments abroad and the internationalization of business models through support for value-added activities, import and integration into production of critical raw materials, highly innovative and technologically advanced products and equipment, indirect exports, as well as ecosystems supporting and facilitating export activity — in accordance with a strategy aligned with OECD best practices and those of other ECAs, with the objective of enhancing competitiveness and supporting national interests;

II. Starting from 30.09.2025, Exim Banca Românească NCS no longer grants new loans and (counter-)guarantees under market-based financing and guarantee schemes. The discontinuation of this activity applies to: new loans and (counter-)guarantees, increases in exposure related to ongoing financing/guarantee commitments, except for exposure increases related to NCS loans and guarantees resulting from restructuring operations and technical increases resulting from foreign exchange differences where the currency of the (counter-)guarantee differs from the currency of the guaranteed product;

III. Exim Banca Românească NCS carries out portfolio management activities for the existing portfolio of instruments in the name and on behalf of the state based on the methodology approved by the Government of Romania (“Sunset Methodology”):

a. financing and guarantee commitments granted in the name and on behalf of the state under both market-based schemes and state aid schemes and currently in force shall continue to be administered by Exim Banca Românească in accordance with specific internal regulations;

b. the Fund for the management of commitments outstanding as of 30 September 2025, provided under Article 10 letter b) of Law No. 96/2000, republished and amended through this emergency ordinance, shall remain available to the Bank until all guarantees are released from obligations, and its level shall be established through an agreement between the Ministry of Finance and Exim Banca Românească.

Until the termination of the mandate to grant products aimed at supporting infrastructure development, development of public utility services, regional development, support for research and development activities, environmental protection, employment and workforce training, support and development of small and medium-sized enterprises, namely 30.09.2025, the total exposure managed by Exim Banca Românească in the name and on behalf of the state amounted to RON 9.222 billion, representing an increase of 129% compared to the balance recorded in 2020, the year in which Exim Banca Românească NCS began implementing products containing a state aid component.

After 30.09.2025, the total exposure managed by Exim Banca Românească in the name and on behalf of the state recorded a gradual reduction, in accordance with the portfolio management methodology approved through a Government Memorandum. At the end of 2025, the total exposure under administration amounted to RON 8.688 billion, 16% lower than at 31.12.2024, mainly driven by the accelerated reduction of exposures containing a state aid component that had entered their repayment phase.

### State aid products from the portfolio under administration

Within its mandate activity, during 2025, Exim Banca Românească continued administering exposures undertaken following the implementation of state aid schemes aimed either at mitigating the effects of the crisis generated by the COVID-19 pandemic or at 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 loans for working capital or investments, with validity until the end of 2023. At the end of 2025, the total accumulated value of exposures administered by Exim Banca Românească related to state aid products amounted to RON 1.757 billion. These ongoing exposures will continue to be administered by Exim Banca Românească in accordance with the specific internal regulations developed for the implementation of the respective state aid schemes.

### Standard products from the portfolio under administration

Considering the Bank's mission of active involvement in supporting and promoting the Romanian business environment, as of 30.09.2025 Exim Banca Românească held 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 loans and guarantees granted by financial institutions under the following forms: *guarantees, counter-guarantees, SME guarantee ceilings, SME guarantee ceilings for investment projects financed with European funds.*

- **NCS financing** - financing intended to support investment projects and/or current activities in priority areas: SME development, infrastructure development, development of public utility services, support for research and development activities, environmental protection, human resources training, regional development and international transactions.

The granting of products in the name and on behalf of the state in the market-based financing and guarantee segment generated exposures at the end of 2025 of 6.679 mil. lei, down by 8,0% compared to the previous year, in the context of the termination of this mandate as at 30.09.2025.

- **insurance** – Exim Banca Românească acts as *export credit agency* in Romania, having in its portfolio insurance policies that allow Romanian exporters of goods and services to grant extended payment terms to foreign buyers, respectively allow Romanian investors to manage political risks related to investments abroad:

- Supplier credit insurance (pre-shipment and post-shipment) on short term (< 2 years) against the risk of non-payment by debtors located in non-EU, non-OECD countries (“non-marketable risks”);
- Temporary insurance, until 31.12.2026, based on the approval of the European Commission, of supplier credit (pre-shipment and post-shipment) on short term (< 2 years) against the risk of non-payment by debtors from the European Union and OECD countries;
- Short-term supplier credit insurance (< 2 years) - for factoring operations;
- Supplier credit insurance (pre-shipment and post-shipment) on medium and long term (>2 years);
- Buyer credit insurance on medium and long term (>2 years);
- “*Green Insurance*”, a product that covers supplier credits or buyer credits intended for medium and long-term projects (>2 years) that contribute to reducing impact or adapting to climate change, consisting of sustainable energy production, projects aimed at replacing fossil fuels, energy efficiency, carbon capture, utilization and storage (CCUS) projects, transport, distribution and storage of energy, clean hydrogen and ammonia, low-emission production processes, low-emission and zero-emission transport, clean energy from minerals and ores;
- Insurance of bank guarantees against the risk of unjustified enforcement by foreign beneficiaries;
- Insurance of Romanian investments abroad against political risks.

As at 31.12.2025, the Exim Banca Românească ECA insurance portfolio included total exposures of 152,4 mil. lei, of which 8% short term (< 2 years) and 92% medium and long-term insurance (>2 years).

## Accession to the InvestEU/EIF pilot support mechanism for export insurance in Ukraine

Based on action 12 of the *SME Relief Package* of InvestEU, approved during 2023, the European Commission together with the European Investment Fund established, in the first part of 2024, a pilot mechanism allowing *export credit agencies* to support SMEs and small mid-cap enterprises in the EU in trade with Ukraine.

Through the partnership signed between Exim Banca Românească ECA and the European Investment Fund, formalized on the sidelines of the Ukraine Recovery Conference in Rome, Romania became part of an extended European initiative, which provides access to financial guarantees for Romanian companies exporting goods and services to Ukraine. Exim Banca Românească ECA signed the contract providing for an initial allocation of 35 million euro, thereby consolidating Romania's role in the European efforts for economic reconstruction and promotion of international trade.

Romanian companies have the opportunity to reduce their commercial risks and thus increase their presence on the Ukrainian market, by granting insured payment terms. By removing the limitations imposed by the traditional export model with "payment on delivery", the capacity to make competitive offers in Ukraine is accelerated. Also, this measure contributes not only to increasing the volume of Romanian exports but also to increasing turnover for exporters, by expanding outlet markets in Ukraine, creating jobs in strategic exporting sectors, as well as stimulating innovation and adaptability in Romanian industries with high potential.

It is estimated that approximately 25 Romanian exporters will benefit from this facility in a first stage, with the possibility of increasing the number of beneficiaries.

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

In accordance with the mandate provided by Law no.96/2000, republished, as subsequently supplemented and amended, Exim Banca Românească acts as Romania's export credit agency and ensures participation in the meetings of the Export Credits Working Group attached to the Council of the European Union and of the OECD Export Credits Working Group.

Romania became a candidate state for integration into the Organisation for Economic Co-operation and Development in January 2022, thus officially starting the accession process to this organization, and within this process, Exim Banca Românească, as Romania's export credit agency, was confirmed as the institution responsible for alignment with the specific export credit regulations within the Trade Committee, respectively the Anti-Corruption Committee. Thus, the Bank acquired an active role in implementing four OECD legal instruments in the field of export credits benefiting from state support, and will contribute to the collaboration with the relevant ministries for expressing Romania's coordinated position in all discussion forums and providing the inputs regarding export credits necessary in the national OECD accession process.

During June 2025, the Chair of the OECD Working Party on Export Credits and Credit Guarantees (ECG), in which Exim Banca Românească participates as ECA, transmitted to the Romanian authorities the conformity opinion regarding the fulfilment by Exim Banca Românească ECA of OECD requirements concerning export support mechanisms.

The OECD review process focused on Exim Banca Românească ECA's capacity to apply the OECD legal instruments specific to export support activity, as well as the degree of convergence of national policies and practices with the best standards promoted by the OECD through Romania's Accession Roadmap.

This international recognition reflects the firm commitment of Exim Banca Românească ECA to align with global standards in the field of official export support and underlines Romania's active role within specialized multilateral bodies.

## 8.2 General regulatory framework and framework for carrying out 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 *Law no. 96/2000 regarding the organization and functioning of EximBank S.A. (the Law)*, republished, as subsequently amended and supplemented, and within the limits of the competences approved by the Interministerial Committee for Financing, Guarantees and Insurance (CIFG.), established based on *GD no.534/2007 regarding the establishment, attributions, 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 the Law, the general framework for carrying out 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 regard, the Board of Directors of Exim Banca Românească approves the organizational and operational framework of the activity carried out under mandate in the name and on behalf of the Romanian state, ensuring the conditions for separation from the activity in its own name and on its own account, both from an organizational and functional perspective;
- attributions and responsibilities of the endorsement and decision-making bodies, respectively CIFGA and the NCS Endorsement 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 to this activity;
- a set of policies, norms and procedures that regulate and define the specific activities in the name and on behalf of the state provided by law and the related operational flows.

Exim Banca Românească carries out, in the name and on behalf of the state, for an indefinite period, within the limit of the mandate granted by the Government of Romania based on Law no.96/2000, republished, as subsequently amended and supplemented, financing, guarantee and insurance activities for the purpose of supporting exports, Romanian investments abroad and international transactions, in its capacity as an institution for official support of export credits, Export Credit Agency.

The strategy for implementing the ECA mandate objectives details the priorities, processes and actions for achieving these objectives, taking into account the resources allocated for this purpose. The implementation of the Exim Banca Românească NCS strategy for these objectives is carried out through the following updated strategic priorities, aimed at building a solid relationship with the business environment and the financial-banking environment:

1. supporting Romanian exports, international transactions and Romanian investments abroad as an activity of internationalization of business models;
2. implementing in transactions the sustainability principles provided in the Exim Banca Românească NCS Policy regarding sustainable development;
3. maintaining dialogue with relevant authorities and financial institutions in Romania and abroad, also considering the development of new products;
4. supporting Romania's efforts to join the Organisation for Economic Co-operation and Development, in the specific area of activity of Exim Banca Românească NCS;
5. ensuring the representation of the interests of the Romanian state within the Export Credits Working Groups attached to the Council of the European Union and the OECD;
6. developing collaboration with entities having a role in the development and promotion of exports, international transactions and investments abroad;
7. monitoring the correlation of the fulfilment of the mentioned objectives with the resources and funds made available for supporting the ECA activity;
8. any other specific objectives established by the Government of Romania.

### 8.3 The role of Exim Banca Românească ECA in the financial ecosystem of the European Union

Exim Banca Românească participates in the enhanced coordination mechanism (“Enhanced Coordination”) created by the European Commission between export credit agencies, financial institutions of the European Union (EIB, EIF, EBRD) and national promotional institutions (national development banks), for the implementation of the “Conclusions of the Council of the European Union on export credits” from 2022. The Conclusions express the commitment of the EU Member States, including Romania, to strengthen the role of export credits as essential instruments in achieving the key policy objectives of the EU and of its Member States.

The Conclusions of the Council of the European Union on export credits adopted in March 2022 drew attention to the experience and essential role of national export credit agencies in mobilizing private capital and the stakeholders necessary for the successful implementation of the EU “Global Gateway” strategy.

As an integral part of this concerted European effort, the mandate of Exim Banca Românească ECA was consolidated starting from 30.09.2025, creating the premises for easier integration into European mechanisms, such as the Global Gateway Strategy, EU defence programmes (SAFE), and the facilitation of access to Critical Raw Materials for European industry:

Global Gateway is the European Union strategy launched in 2021 to support sustainable development at global level through investments in quality infrastructure, especially in developing countries. Its purpose is to create smart, clean and secure connections in essential areas such as digitalization, energy and climate, transport, health, education and research. The strategy is implemented through the “Team Europe” approach, which brings together the European Commission, Member States, European financial institutions and the private sector to maximize the impact of investments on destination markets. Completing the product portfolio of Exim Banca Românească, in its capacity as Romania’s ECA, with new financing and guarantee instruments will contribute to the promotion and support of companies that need financing for export and internationalization, facilitating the implementation of projects of interest within Global Gateway. Exim Banca Românească ECA is part of the process through which the European Commission explores innovative options for an EU strategy on export credits, with the aim of better supporting European exporters and promoting a level playing field for EU companies on third-country markets, while also contributing to the broader EU political agenda (for example, the Green Deal, the Digital Agenda, Global Gateway, NDICI Global Europe, the Strategy for Africa or Indo-Pacific).

The coordination of Exim Banca Românească ECA with the other export credit agencies in the European Union and with the coordinated approach of the European Commission through Team Europe is likely to create opportunities for the development of international transactions of Romanian companies on markets in Africa, Latin America, the Middle East and other geographical areas with which free trade agreements are signed for the benefit of all Member States of the European Union.

Events such as the COVID-19 pandemic and the war in Ukraine highlighted the vulnerability of supply chains for both the European economy and the Romanian economy, as well as structural dependencies on suppliers from outside the European Union. In order to protect its industrial production capacities and support its green and digital transition, while reducing geopolitical and economic risks, the European Union approved the strategy on critical raw materials, materialized through the European Critical Raw Materials Act (CRMA). This framework creates the premises for an integrated approach, aimed not only at security of supply, but also at developing competitive industrial capacities at Member State level. Through the specific instruments for facilitating international transactions in the portfolio of European ECAs, including Exim Banca Românească, significant financial resources necessary for making investments in third markets and reducing risks may be mobilized.

European defence programmes, including the financial allocations intended for Romania under the SAFE initiative, underline the importance of strengthening industrial capacities and intensifying cooperation between Member States. These instruments reflect the EU’s commitment to supporting the development of the European security and defence sector through dedicated financial instruments. In this regard and in the geopolitical context of Ukraine, together with the allocations related to the Multiannual Financial Framework (MFF) 2021–2027 and 2028–2034, the European Union has redirected its budgetary priorities, with significant resources being directed towards supporting Ukraine’s reconstruction, resilience and European integration efforts.

Validation by the OECD Secretariat of Exim Banca Românească ECA's export support mechanisms:

Romania became a candidate state for integration into the Organisation for Economic Co-operation and Development in January 2022, thus officially starting the accession process to this organization, and Exim Banca Românească, in its capacity as export credit agency, was designated as the focal point for the export credit area.

In consideration of this position, in its capacity as Romania's *export credit agency*, 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 – *Arrangement on Officially Supported Export Credits (OECD Legal 5005)*;
2. Common Approaches in the field of the environment - *Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (The “Common Approaches” (OECD/LEGAL/0393)*);
3. Anti-bribery Recommendations - *Recommendation of the Council on Bribery and Officially Supported Export Credits (OECD/LEGAL/0447) – instrument shared with the Ministry of Justice*;
4. 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)*.

The full alignment of Exim Banca Românească policies and regulations in the name and on behalf of the state with the 4 OECD instruments represents a sine qua non condition for obtaining the formal opinion from the Secretariat of the OECD Working Party on Export Credits, which confirms the closure of the *export credits* sub-chapter within the OECD Trade chapter.

During 2022-2025, the policies and regulations of Exim Banca Românească, in the name and on behalf of the state, regarding the official support of export credits were updated in accordance with the amendments to the OECD instruments and with the best practices of the Participants to the Arrangement and of the members of the OECD Working Party on Export Credits. These amendments were included in the “*Technical Assessment Report of Romania in the field of officially supported export credits*”, approved by the OECD in June 2025.

#### **8.4 Coordination with Romania's National Contact Point for responsible business conduct**

Within Romania's OECD accession process and interinstitutional coordination, pursuant to GD no.1430/2024, Exim Banca Românească ECA was included as a permanent observer at the meetings of the National Contact Point managed by the Romanian Agency for Investments and Foreign Trade.

Romania's National Contact Point for responsible business conduct is the governmental body responsible for implementing the OECD Guidelines for responsible business conduct. These international recommendations establish voluntary standards for multinational enterprises, covering areas such as human rights, workers' rights, environmental protection, combating corruption and tax transparency.

In accordance with the requirements of the OECD Recommendation on Bribery and Officially Supported Export Credits, within its assessments, Exim Banca Românească ECA established operational mechanisms allowing the analysis of any statements or reports made publicly available by the National Contact Point and ensured the link between the website [www.eximbank.ro](http://www.eximbank.ro) and <https://pnc-rbc.gov.ro/1/> to facilitate stakeholders' access to relevant information.

Through the letter sent to Romania by the OECD Working Party on Responsible Business Conduct, Exim Banca Românească's experience regarding the promotion of responsible business conduct was positively appreciated and recommended as an example of best practices for public institutions in Romania.

#### **Organization of interinstitutional consultations and an information session with the Ministry of Justice and DNA**

Within Romania's OECD accession process and interinstitutional coordination, considering the sharing of OECD instruments regarding responsible business conduct and the prevention and combating of corruption in international transactions, Exim Banca Românească ECA participated in interinstitutional consultations and in an information session together with specialists from the Ministry of Justice and the National Anticorruption Directorate, for the purpose of increasing the efficiency of Exim Banca Românească ECA's institutional mechanisms for detecting acts of bribery of foreign public officials.

## 8.5 Perspectives and priorities

In the context of the integration of Exim Banca Românească ECA into the financial ecosystem of the European Union and of the recent confirmation from the OECD regarding the implementation of OECD requirements in the specific mechanisms for supporting export credits, the Bank will continue developing its activity of supporting exports, investments abroad and international transactions, in line with the competitiveness objectives of the Romanian economy.

The main directions of action concern:

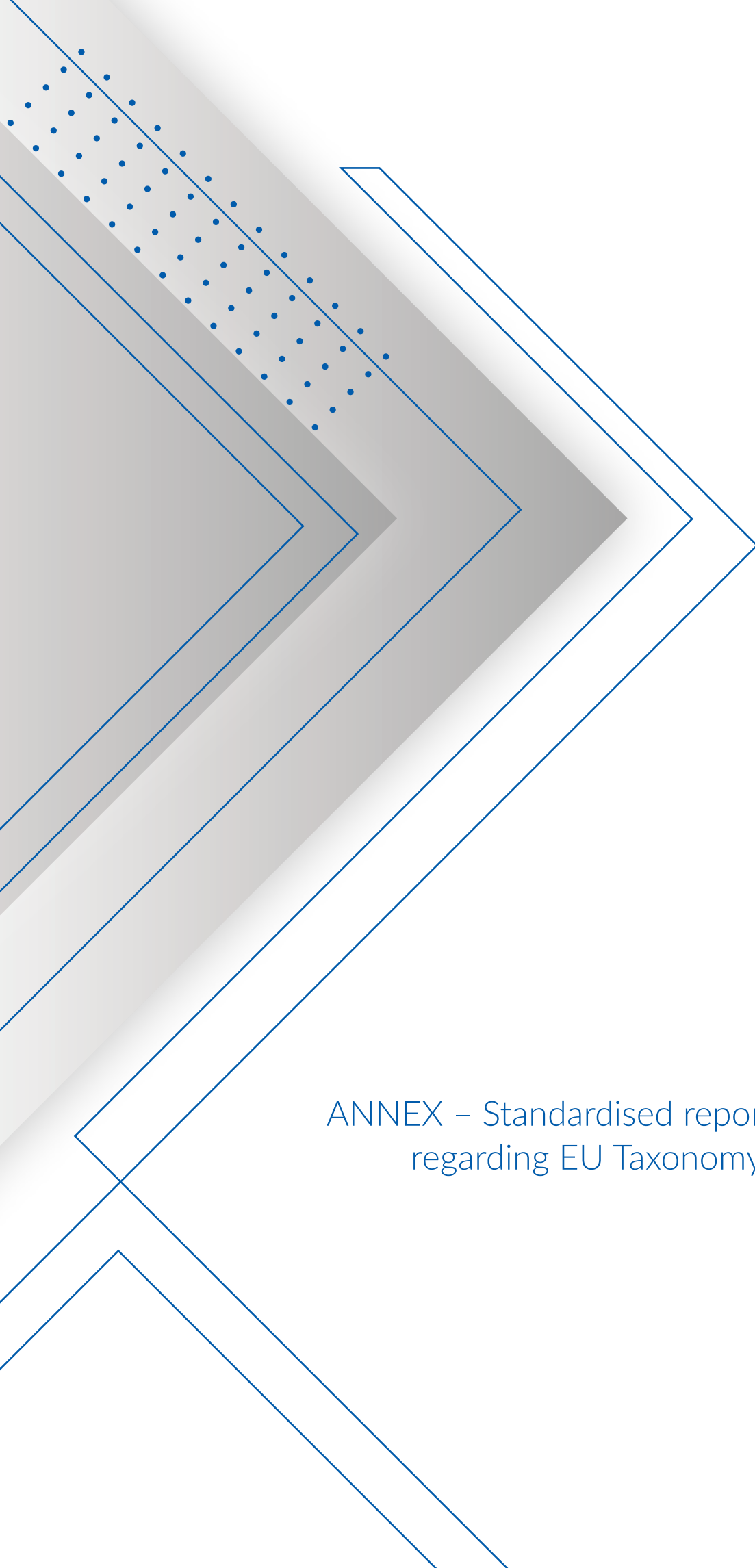
- **Adapting and expanding the ECA product portfolio**, depending on the needs of Romanian companies and the developments of the European and international framework;
- **Aligning support instruments with OECD and EU practices**, in order to ensure competitive conditions comparable to those of other states;
- **Facilitating access to financing for Romanian companies** involved in export transactions and investments on international markets.

Through these directions, Exim Banca Românească ECA aims to consolidate its role in supporting the internationalization of Romanian companies and increasing their participation on foreign markets.

BOARD OF DIRECTORS

Chairman,

Andrei Răzvan Micu



ANNEX – Standardised reporting tables  
regarding EU Taxonomy alignment



1.Assets included for calculating the GAR (based on turnover) - continued

		Reference date for disclosure: 31.12.2025												
		Climate Change Mitigation - CCM			Climate Change Adaptation - CCA		Water and marine resources - WTR		Circular economy - CE					
		Of which towards taxonomy-relevant sectors (taxonomy-eligible)			Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which towards taxonomy-relevant sectors (taxonomy-eligible)					
		Of which environmentally sustainable (taxonomy-aligned)	Of which transitional	Of which enabling	Of which environmentally sustainable (taxonomy-aligned)	Of which enabling	Of which environmentally sustainable (taxonomy-aligned)	Of which enabling	Of which environmentally sustainable (taxonomy-aligned)	Of which enabling	Of which enabling			
Total (gross) carrying amount	2.596	5	10.471	493	154	331	1	0	0	1	19	-	-	
30	Other forms of financing for local governments													
31	Collateral obtained by taking possession: residential and commercial immovable property													
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)													
33	Financial and non-financial undertakings	9.283												
34	SMEs and NFCs (other than SMEs) that are not subject to disclosure obligations under the Non-Financial Reporting Directive	9.275												
35	Loans and advances	9.185												
36	Of which loans collateralized by commercial immovable property													
37	Of which building renovation loans													
38	Debt securities													
39	Equity instruments	89												
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive	9												
41	Loans and advances	9												
42	Debt securities													
43	Equity instruments													
44	Derivative financial instruments	7												
45	Interbank loans on demand													
46	Cash and cash-related assets	747												
47	Other assets (for example, goodwill, commodities, etc.)	434												
48	<b>Total GAR assets</b>	<b>17.464</b>	<b>493</b>	<b>154</b>	<b>331</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>19</b>	<b>-</b>	<b>-</b>	
49	Other assets not included in the GAR calculation	12.463												
50	Central governments and supranational issuers	7.329												
51	Exposures to central banks	5.134												
52	Trading portfolio													
53	<b>Total assets</b>	<b>29.927</b>	<b>119</b>	<b>117</b>	<b>117</b>	<b>-</b>	<b>117</b>	<b>-</b>	<b>117</b>	<b>-</b>	<b>117</b>	<b>-</b>	<b>-</b>	
	<b>Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive</b>	<b>193</b>	<b>119</b>	<b>117</b>	<b>117</b>	<b>-</b>	<b>117</b>	<b>-</b>	<b>117</b>	<b>-</b>	<b>117</b>	<b>-</b>	<b>-</b>	
54	Financial guarantees	193												
55	Assets under management	-												
56	Of which debt securities													
57	Of which equity instruments													



### 1. Assets included for calculating the GAR (based on turnover) - continued

		Reference date for disclosure: 31.12.2025											
		Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					
		Of which towards taxonomy-relevant sectors (taxonomy-eligible)			Of which towards taxonomy-relevant sectors (taxonomy-eligible)			Of which towards taxonomy-relevant sectors (taxonomy-eligible)					
		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)	
		Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property							5					
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)												
33	Financial and non-financial undertakings												
34	SMEs and NfCs (other than SMEs) that are not subject to disclosure obligations under the Non-Financial Reporting Directive												
35	Loans and advances												
36	Of which loans collateralized by commercial immovable property												
37	Of which building renovation loans												
38	Debt securities												
39	Equity instruments												
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive												
41	Loans and advances												
42	Debt securities												
43	Equity instruments												
44	Derivative financial instruments												
45	Interbank loans on demand												
46	Cash and cash-related assets												
47	Other assets (for example, goodwill, commodities, etc.)												
48	<b>Total GAR assets</b>							1,372		493		154	331
49	<b>Other assets not included in the GAR calculation</b>												
50	Central governments and supranational issuers												
51	Exposures to central banks												
52	Trading portfolio												
53	<b>Total assets</b>												
	<b>Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive</b>							119		117		-	117
54	Financial guarantees							119		117		-	117
55	Assets under management												
56	Of which debt securities												
57	Of which equity instruments												

## 2. Assets included for calculating the GAR (based on CapEx)

Million Lei		Reference date for disclosure: 31.12.2025															
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				Water and marine resources - WTR				Circular economy - CE			
		Of which towards taxonomy-relevant sectors (taxonomy-eligible)				Of which towards taxonomy-relevant sectors (taxonomy-eligible)				Of which towards taxonomy-relevant sectors (taxonomy-eligible)				Of which towards taxonomy-relevant sectors (taxonomy-eligible)			
		Of which environmentally sustainable (taxonomy-aligned)		Of which transitional		Of which environmentally sustainable (taxonomy-aligned)		Of which enabling		Of which environmentally sustainable (taxonomy-aligned)		Of which enabling		Of which environmentally sustainable (taxonomy-aligned)		Of which enabling	
-	-	GAR – Assets included in the numerator and denominator										-	-	-	-		
1	Loans and advances, debt securities and equity instruments not eligible for the GAR calculation from the perspective of high-frequency trading	6.993	1.187	320	154	157	1	0	0	0	1	-	-	19	-	-	
2	Financial undertakings	539	89	14	4	0	1	0	0	0	-	-	-	-	-	-	
3	Credit institutions	539	89	14	4	0	1	0	0	0	-	-	-	-	-	-	
4	Loans and advances	539	89	14	4	0	1	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 advances																
10	Debt securities, including use of proceeds (UoP)																
11	Equity instruments																
12	Of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances																
14	Debt securities, including use of proceeds (UoP)																
15	Equity instruments																
16	Of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances																
18	Debt securities, including use of proceeds (UoP)																
19	Equity instruments																
20	Non-financial undertakings	584	170	156	-	156	-	-	-	-	1	-	-	19	-	-	
21	Loans and advances	584	170	156	-	156	-	-	-	-	1	-	-	19	-	-	
22	Debt securities, including use of proceeds (UoP)																
23	Equity instruments																
24	Households	3.268	922	150	150	-	-	-	-	-	-	-	-	-	-	-	
25	Of which loans collateralized by residential immovable property	2.104	922	150	150	-	-	-	-	-	-	-	-	-	-	-	
26	Of which building renovation loans																
27	Of which car loans																
28	Financing for local governments	2.596	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing																

2. Assets included for calculating the GAR (based on CapEx) - continued

		Reference date for disclosure: 31.12.2025																			
		Climate Change Mitigation - CCM			Climate Change Adaptation - CCA			Water and marine resources - WTR			Circular economy - CE										
		Of which towards taxonomy-relevant sectors (taxonomy-eligible)			Of which towards taxonomy-relevant sectors (taxonomy-eligible)			Of which towards taxonomy-relevant sectors (taxonomy-eligible)			Of which towards taxonomy-relevant sectors (taxonomy-eligible)										
		Of which environmentally sustainable (taxonomy-aligned)	Of which transitional	Of which enabling	Of which environmentally sustainable (taxonomy-aligned)	Of which enabling	Of which enabling	Of which environmentally sustainable (taxonomy-aligned)	Of which enabling	Of which enabling	Of which environmentally sustainable (taxonomy-aligned)										
	Total [gross] carrying amount																				
30	Other forms of financing for local governments	2.596																			
31	Collateral obtained by taking possession: residential and commercial immovable property	5																			
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)	10.471																			
33	Financial and non-financial undertakings	9.283																			
34	SMEs and NFCs (other than SMEs) that are not subject to disclosure obligations under the Non-Financial Reporting Directive	9.275																			
35	Loans and advances	9.185																			
36	Of which loans collateralized by commercial immovable property																				
37	Of which building renovation loans																				
38	Debt securities																				
39	Equity instruments	89																			
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive	9																			
41	Loans and advances	9																			
42	Debt securities																				
43	Equity instruments																				
44	Derivative financial instruments	7																			
45	Interbank loans on demand																				
46	Cash and cash-related assets	747																			
47	Other assets (for example, goodwill, commodities, etc.)	434																			
48	Total GAR assets	17.464	320	154	157	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	19
49	Other assets not included in the GAR calculation	12.463																			
50	Central governments and supranational issuers	7.329																			
51	Exposures to central banks	5.134																			
52	Trading portfolio																				
53	Total assets	29.977																			
	Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive	193																			
54	Financial guarantees	193																			
55	Assets under management																				
56	Of which debt securities																				
57	Of which equity instruments																				

2. Assets included for calculating the GAR (based on CapEx) - continued

		Reference date for disclosure: 31.12.2025																				
		Pollution - PPC					Biodiversity and ecosystems - BIO					TOTAL (CCM+CCA+MTR+CE+PPC+BIO)										
		Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which environmentally sustainable (taxonomy-aligned)		Of which enabling	Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which environmentally sustainable (taxonomy-aligned)		Of which enabling	Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which environmentally sustainable (taxonomy-aligned)		Of which enabling						
		Of which use of proceeds	Of which use of proceeds	Of which use of proceeds	Of which use of proceeds		Of which use of proceeds	Of which use of proceeds	Of which use of proceeds	Of which use of proceeds		Of which use of proceeds	Of which use of proceeds	Of which use of proceeds	Of which use of proceeds							
-	GAR – Assets included in the numerator and denominator																					
1	Loans and advances, debt securities and equity instruments not eligible for the GAR calculation from the perspective of high-frequency trading											1.206	320	154	157	1						
2	Financial undertakings											89	14	4	0	1						
3	Credit institutions											89	14	4	0	1						
4	Loans and advances											89	14	4	0	1						
5	Debt securities, including use of proceeds (UoP)											-	-	-	-	-						
6	Equity instruments											-	-	-	-	-						
7	Other financial corporations											-	-	-	-	-						
8	Of which investment firms											-	-	-	-	-						
9	Loans and advances											-	-	-	-	-						
10	Debt securities, including use of proceeds (UoP)											-	-	-	-	-						
11	Equity instruments											-	-	-	-	-						
12	Of which asset management companies											-	-	-	-	-						
13	Loans and advances											-	-	-	-	-						
14	Debt securities, including use of proceeds (UoP)											-	-	-	-	-						
15	Equity instruments											-	-	-	-	-						
16	Of which insurance undertakings											-	-	-	-	-						
17	Loans and advances											-	-	-	-	-						
18	Debt securities, including use of proceeds (UoP)											-	-	-	-	-						
19	Equity instruments											-	-	-	-	-						
20	Non-financial undertakings											190	156	-	156	-						
21	Loans and advances											190	156	-	156	-						
22	Debt securities, including use of proceeds (UoP)											-	-	-	-	-						
23	Equity instruments											-	-	-	-	-						
24	Households											922	150	150	-	-						
25	Of which loans collateralised by residential immovable property											922	150	150	-	-						
26	Of which building renovation loans											-	-	-	-	-						
27	Of which car loans											-	-	-	-	-						
28	Financing for local governments											-	-	-	-	-						
29	Housing financing											-	-	-	-	-						

2. Assets included for calculating the GAR (based on CapEx) - continued

		Reference date for disclosure: 31.12.2025													
		Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)							
		Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which environmentally sustainable (taxonomy-aligned)		Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which environmentally sustainable (taxonomy-aligned)		Of which towards taxonomy-relevant sectors (taxonomy-eligible)		Of which environmentally sustainable (taxonomy-aligned)			
		Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling				
30	Other forms of financing for local governments														
31	Collateral obtained by taking possession: residential and commercial immovable property														
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)									5					
33	Financial and non-financial undertakings														
34	SMEs and NFCs (other than SMES) that are not subject to disclosure obligations under the Non-Financial Reporting Directive														
35	Loans and advances														
36	Of which loans collateralized by commercial immovable property														
37	Of which building renovation loans														
38	Debt securities														
39	Equity instruments														
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive														
41	Loans and advances														
42	Debt securities														
43	Equity instruments														
44	Derivative financial instruments														
45	Interbank loans on demand														
46	Cash and cash-related assets														
47	Other assets (for example, goodwill, commodities, etc.)														
48	<b>Total GAR assets</b>									1.206		320	154	157	1
49	Other assets not included in the GAR calculation														
50	Central governments and supranational issuers														
51	Exposures to central banks														
52	Trading portfolio														
53	<b>Total assets</b>														
	Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive									66					
54	Financial guarantees									66					
55	Assets under management														
56	Of which debt securities														
57	Of which equity instruments														

**3. GAR by sector (based on turnover)**

Reference date for disclosure 31.12.2025											
Climate Change Mitigation – CCM			Climate Change Adaptation – CCA			Water and marine resources – WTR			Circular economy – CE		
Non-financial corporations (subject to the Non-Financial Reporting Directive)			Non-financial corporations (subject to the Non-Financial Reporting Directive)			Non-financial corporations (subject to the Non-Financial Reporting Directive)			Non-financial corporations (subject to the Non-Financial Reporting Directive)		
Gross carrying amount			Gross carrying amount			Gross carrying amount			Gross carrying amount		
Of which environmentally sustainable (CCM)			Of which environmentally sustainable (CCA)			Of which environmentally sustainable (WTR)			Of which environmentally sustainable (CE)		
mil. lei			mil. lei			mil. lei			mil. lei		
Breakdown by sector – 4-digit NACE level (code and label)											
1	2221 – Manufacture of plastic plates, sheets, tubes and profiles	63	2								
2	2442 – Aluminium production	399	329								
3	3600 – Water collection, treatment and supply	60	-								
4	4690 – Non-specialised wholesale trade	5	-								
5	5310 – Postal activities under universal service obligation	58	-								

continued

Reference date for disclosure 31.12.2025											
Pollution – PPC			Biodiversity and ecosystems – BIO			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)					
Non-financial corporations (subject to the Non-Financial Reporting Directive)			Non-financial corporations (subject to the Non-Financial Reporting Directive)			Non-financial corporations (subject to the Non-Financial Reporting Directive)					
Gross carrying amount			Gross carrying amount			Gross carrying amount					
Of which environmentally sustainable (PPC)			Of which environmentally sustainable (BIO)			Of which environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)					
mil. lei			mil. lei			mil. lei					
Breakdown by sector – 4-digit NACE level (code and label)											
1	2221 – Manufacture of plastic plates, sheets, tubes and profiles					63	2				
2	2442 – Aluminium production					399	329				
3	3600 – Water collection, treatment and supply					60	-				
4	4690 – Non-specialised wholesale trade					5	-				
5	5310 – Postal activities under universal service obligation					58	-				

**4. GAR by sector (based on CapEx)**

Reference date for disclosure 31.12.2025													
Climate Change Mitigation - CCM		Climate Change Adaptation - CCA			Water and marine resources - WTR			Circular economy - CE					
		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Financial Reporting Directive	
		Gross carrying amount	mil. lei	Of which environmentally sustainable (CCM)	mil. lei	Of which environmentally sustainable (CCA)	mil. lei	Of which environmentally sustainable (CCA)	Gross carrying amount	mil. lei	Of which environmentally sustainable (WTR)	mil. lei	Of which environmentally sustainable (CE)
Breakdown by sector – 4-digit NACE level (code and label)													
1	2221 – Manufacture of plastic plates, sheets, tubes and profiles	63	14										
2	2442 – Aluminium production	399	142										
3	3600 – Water collection, treatment and supply	60	-										
4	4690 – Non-specialised wholesale trade	5	-										
5	5310 – Postal activities under universal service obligation	58	0										

continued

TOTAL (CCM+CCA+WTR+CE+PPC+PIO)													
Pollution - PPC		Biodiversity and ecosystems - BIO			Non-financial corporations (subject to the Non-Financial Reporting Directive)			SMEs and other NFCs not subject to the Financial Reporting Directive					
		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Financial Reporting Directive	
		Gross carrying amount	mil. lei	Of which environmentally sustainable (PPC)	mil. lei	Of which environmentally sustainable (BIO)	mil. lei	Of which environmentally sustainable (BIO)	Gross carrying amount	mil. lei	Of which environmentally sustainable (WTR+CE+PPC+PIO)	mil. lei	Of which environmentally sustainable (WTR+CE+PPC+PIO)
Breakdown by sector – 4-digit NACE level (code and label)													
1	2221 – Manufacture of plastic plates, sheets, tubes and profiles												
2	2442 – Aluminium production												
3	3600 – Water collection, treatment and supply												
4	4690 – Non-specialised wholesale trade												
5	5310 – Postal activities under universal service obligation												

5. GAR KPI on stock (based on turnover)

		Reference date for disclosure 31.12.2025																
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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 transitional		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling
-	% (compared to total covered assets in the denominator)																	
1	<b>GAR – Assets included in the numerator and denominator:</b> Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading	19,34%	7,05%	2,20%	4,74%	0,01%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,27%	0,00%	0,00%	0,00%	0,00%
2	<b>Financial corporations</b>	16,13%	2,24%	0,72%	0,03%	0,14%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	16,13%	2,24%	0,72%	0,03%	0,14%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and advances																	
5	Debt securities, including use of proceeds (UoP)																	
6	Equity instruments																	
7	Other financial corporations																	
8	Of which investment firms																	
9	Loans and advances																	
10	Debt securities, including use of proceeds (UoP)																	
11	Equity instruments																	
12	Of which asset management companies																	
13	Loans and advances																	
14	Debt securities, including use of proceeds (UoP)																	
15	Equity instruments																	
16	Of which insurance undertakings																	
17	Loans and advances																	
18	Debt securities, including use of proceeds (UoP)																	
19	Equity instruments																	
20	<b>Non-financial corporations</b>	57,87%	56,70%	0,00%	56,70%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,58%	0,00%	0,00%	0,00%	0,00%
21	Loans and advances	57,87%	56,70%	0,00%	56,70%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	3,25%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including use of proceeds (UoP)																	
23	Equity instruments																	
24	<b>Households</b>	28,22%	4,58%	4,58%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	Of which loans collateralised by residential immovable property	43,84%	7,12%	7,12%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	Of which building renovation loans																	
27	Of which car loans																	
28	<b>Financing for local governments</b>	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing financing																	
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	<b>Total GAR assets</b>	7,74%	2,82%	0,88%	1,90%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,11%	0,00%	0,00%	0,00%	0,00%

5. GAR KPI on stock (based on turnover) - continued

		Reference date for disclosure 31.12.2025											
		Pollution - PPC				Biodiversity and ecosystems - BIO				CCM+CCA+WTR+CE+PPC+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)			
		Of which use of proceeds		Of which enabling		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 advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading												
2	Financial corporations												
3	Credit institutions												
4	Loans and advances												
5	Debt securities, including use of proceeds (UoP)												
6	Equity instruments												
7	Other financial corporations												
8	Of which investment firms												
9	Loans and advances												
10	Debt securities, including use of proceeds (UoP)												
11	Equity instruments												
12	Of which asset management companies												
13	Loans and advances												
14	Debt securities, including use of proceeds (UoP)												
15	Equity instruments												
16	Of which insurance undertakings												
17	Loans and advances												
18	Debt securities, including use of proceeds (UoP)												
19	Equity instruments												
20	Non-financial corporations												
21	Loans and advances												
22	Debt securities, including use of proceeds (UoP)												
23	Equity instruments												
24	Households												
25	Of which loans collateralised by residential immovable property												
26	Of which building renovation loans												
27	Of which car loans												
28	Financing for local governments												
29	Housing financing												
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property												
32	Total GAR assets												

6. GAR KPI on stock (based on CapEx)

		Reference date for disclosure 31.12.2025															
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)	
% (compared to total covered assets in the denominator)		Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	
-	<b>GAR – Assets included in the numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading	16,97%	2,20%	0,02%	0,00%	0,00%	0,00%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
2	<b>Financial corporations</b>	16,51%	0,72%	0,27%	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
3	Credit institutions	16,51%	0,72%	0,27%	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
4	Loans and advances																
5	Debt securities, including use of proceeds (UoP)																
6	Equity instruments																
7	Other financial corporations																
8	Of which investment firms																
9	Loans and advances																
10	Debt securities, including use of proceeds (UoP)																
11	Equity instruments																
12	Of which asset management companies																
13	Loans and advances																
14	Debt securities, including use of proceeds (UoP)																
15	Equity instruments																
16	Of which insurance undertakings																
17	Loans and advances																
18	Debt securities, including use of proceeds (UoP)																
19	Equity instruments																
20	<b>Non-financial corporations</b>	29,15%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
21	Loans and advances	29,15%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	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	<b>Households</b>	28,22%	4,58%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
25	Of which loans collateralised by residential immovable property	43,84%	7,12%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
26	Of which building renovation loans																
27	Of which car loans																
28	<b>Financing for local governments</b>	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
29	Housing financing																
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
31	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	<b>Total GAR assets</b>	6,79%	1,83%	0,90%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	



7. GAR KPI on flow (based on turnover)

		Reference date for disclosure 31.12.2025															
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)	
% (compared to total covered assets in the denominator)		Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	
-	<b>GAR – Assets included in the numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading	24,21%	0,84%	0,13%	0,14%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
2	<b>Financial corporations</b>	<b>24,65%</b>	<b>0,65%</b>	<b>0,10%</b>	<b>0,16%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	
3	Credit institutions	24,65%	0,65%	0,10%	0,16%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
4	Loans and advances																
5	Debt securities, including use of proceeds (UoP)																
6	Equity instruments																
7	Other financial corporations																
8	Of which investment firms																
9	Loans and advances																
10	Debt securities, including use of proceeds (UoP)																
11	Equity instruments																
12	Of which asset management companies																
13	Loans and advances																
14	Debt securities, including use of proceeds (UoP)																
15	Equity instruments																
16	Of which insurance undertakings																
17	Loans and advances																
18	Debt securities, including use of proceeds (UoP)																
19	Equity instruments																
20	<b>Non-financial corporations</b>	<b>22,63%</b>	<b>0,00%</b>	<b>10,92%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	
21	Loans and advances	22,63%	0,00%	10,92%	0,00%	0,00%	0,00%	0,00%	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	<b>Households</b>	<b>32,85%</b>	<b>3,65%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	
25	Of which loans collateralised by residential immovable property	100,00%	11,12%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
26	Of which building renovation loans																
27	Of which car loans																
28	<b>Financing for local governments</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	
29	Housing financing																
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
31	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	<b>100,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	
32	<b>Total GAR assets</b>	<b>15,75%</b>	<b>1,29%</b>	<b>0,09%</b>	<b>0,09%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	<b>0,00%</b>	

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

		Reference date for disclosure 31.12.2025											
		Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+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		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 advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading												
2	Financial corporations												
3	Credit institutions												
4	Loans and advances												
5	Debt securities, including use of proceeds (UoP)												
6	Equity instruments												
7	Other financial corporations												
8	Of which investment firms												
9	Loans and advances												
10	Debt securities, including use of proceeds (UoP)												
11	Equity instruments												
12	Of which asset management companies												
13	Loans and advances												
14	Debt securities, including use of proceeds (UoP)												
15	Equity instruments												
16	Of which insurance undertakings												
17	Loans and advances												
18	Debt securities, including use of proceeds (UoP)												
19	Equity instruments												
20	Non-financial corporations												
21	Loans and advances												
22	Debt securities, including use of proceeds (UoP)												
23	Equity instruments												
24	Households												
25	Of which loans collateralised by residential immovable property												
26	Of which building renovation loans												
27	Of which car loans												
28	Financing for local governments												
29	Housing financing												
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property												
32	Total GAR assets												

8. GAR KPI on flow (based on CapEx)

		Reference date for disclosure 31.12.2025															
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)	
% (compared to total covered assets in the denominator)		Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	
-	<b>GAR – Assets included in the numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading	24,76%	0,85%	0,39%	0,25%	0,03%	0,00%	0,00%	0,06%	0,00%	0,00%	0,00%	0,10%	0,00%	0,00%	0,00%	
2	<b>Financial corporations</b>	25,29%	0,66%	0,07%	0,29%	0,03%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
3	Credit institutions	25,29%	0,66%	0,07%	0,29%	0,03%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
4	Loans and advances																
5	Debt securities, including use of proceeds (UoP)																
6	Equity instruments																
7	Other financial corporations																
8	Of which investment firms																
9	Loans and advances																
10	Debt securities, including use of proceeds (UoP)																
11	Equity instruments																
12	Of which asset management companies																
13	Loans and advances																
14	Debt securities, including use of proceeds (UoP)																
15	Equity instruments																
16	Of which insurance undertakings																
17	Loans and advances																
18	Debt securities, including use of proceeds (UoP)																
19	Equity instruments																
20	<b>Non-financial corporations</b>	19,91%	0,00%	13,64%	0,00%	0,00%	0,00%	0,00%	13,64%	0,00%	0,00%	23,80%	0,00%	0,00%	0,00%	0,00%	
21	Loans and advances	19,91%	0,00%	13,64%	0,00%	0,00%	0,00%	0,00%	13,64%	0,00%	0,00%	23,80%	0,00%	0,00%	0,00%	0,00%	
22	Debt securities, including use of proceeds (UoP)																
23	Equity instruments																
24	<b>Households</b>	32,85%	3,65%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
25	Of which loans collateralised by residential immovable property	100,00%	11,12%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
26	Of which building renovation loans																
27	Of which car loans																
28	<b>Financing for local governments</b>	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
29	Housing financing																
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
31	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	<b>Total GAR assets</b>	16,11%	1,52%	0,08%	0,16%	0,02%	0,00%	0,00%	0,04%	0,00%	0,00%	0,07%	0,00%	0,00%	0,00%	0,00%	

8. GAR KPI on flow (based on CapEx) - continued

		Reference date for disclosure: 31.12.2025													
		Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+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)							
		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which transitional	Of which enabling	
-	GAR - Assets included in the numerator and denominator														
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading														
2	Financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	24,95%	2,34%	0,91%	0,39%	0,25%	41,67%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	25,32%	2,29%	0,66%	0,07%	0,29%	36,70%
4	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	25,32%	2,29%	0,66%	0,07%	0,29%	36,70%
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 advances														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 advances														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 advances														0,00%
18	Debt securities, including use of proceeds (UoP)														0,00%
19	Equity instruments														0,00%
20	Non-financial corporations									57,35%	13,64%	13,64%	13,64%	0,00%	0,18%
21	Loans and advances									57,35%	13,64%	13,64%	13,64%	0,00%	0,18%
22	Debt securities, including use of proceeds (UoP)														0,00%
23	Equity instruments														0,00%
24	Households									32,85%	3,65%	3,65%	0,00%	0,00%	3,04%
25	Of which loans collateralised by residential immovable property									100,00%	11,12%	11,12%	0,00%	0,00%	1,00%
26	Of which building renovation loans														0,00%
27	Of which car loans														0,00%
28	Financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	1,75%
29	Housing financing														0,00%
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	1,75%
31	Collateral obtained by taking possession: residential and commercial immovable property	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	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%	16,23%	1,52%	0,59%	0,08%	0,16%	64,05%

9. Off-balance-sheet exposures KPI (based on turnover)

		Reference date for disclosure: 31.12.2025																												
		Climate Change Mitigation - CCM			Climate Change Adaptation - CCA			Water and marine resources - WTR			Circular economy - CE			Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)										
% (compared to total eligible off-balance-sheet assets)		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)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)										
		Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which transitional	Of which use of proceeds	Of which enabling	Of which transitional	Of which use of proceeds	Of which enabling	Of which transitional	Of which use of proceeds	Of which enabling	Of which transitional	Of which use of proceeds	Of which enabling	Of which transitional	Of which use of proceeds	Of which enabling	Of which transitional								
1	Financial guarantees (Financial guarantees KPI)	61,6%	60,9%	0,0%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	61,5%	60,86%	0,00%	60,86%	0,00%	0,00%	
2	Assets under management (Assets under management KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

**10. Off-balance-sheet exposures KPI (based on CapEx)**

		Reference date for disclosure: 31.12.2025													
		Climate Change Mitigation - CCM		Climate Change Adaptation - CCA		Water and marine resources - WTR		Circular economy - CE		Pollution - PPC		Biodiversity and ecosystems - BIO		TOTAL (CCM+CCA+WTR+CE+PPC+BIO)	
% (compared to total eligible off-balance-sheet assets)		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)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)	
		Of which use of proceeds	Of which transitional enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
1	Financial guarantees (Financial guarantees KPI)	34,0%	-	-	-	-	-	-	-	-	-	-	-	-	34,0%
2	Assets under management (Assets under management KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-



## 1. Assets included for calculating the GAR (based on turnover) - continued

		Reference date for disclosure: 31.12.2024										
		Climate Change Mitigation - CCM			Climate Change Adaptation - CCA			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-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)	
		Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
30	Other forms of financing for local governments	1.944	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable property	6	0	0	-	-	-	-	-	-	-	-
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)	10.264	0	0	0	0	-	-	-	-	-	-
33	Financial and non-financial undertakings	9.307	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (other than SMEs) that are not subject to disclosure obligations under the Non-Financial Reporting Directive	9.299	-	-	-	-	-	-	-	-	-	-
35	Loans and advances	9.212	-	-	-	-	-	-	-	-	-	-
36	Of which loans collateralized by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-
37	Of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-
38	Debt securities	-	-	-	-	-	-	-	-	-	-	-
39	Equity instruments	87	-	-	-	-	-	-	-	-	-	-
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive	8	-	-	-	-	-	-	-	-	-	-
41	Loans and advances	8	-	-	-	-	-	-	-	-	-	-
42	Debt securities	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
44	Derivative financial instruments	43	-	-	-	-	-	-	-	-	-	-
45	Interbank loans on demand	-	-	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	514	-	-	-	-	-	-	-	-	-	-
47	Other assets (for example, goodwill, commodities, etc.)	401	-	-	-	-	-	-	-	-	-	-
48	<b>Total GAR assets</b>	<b>17.251</b>	<b>127</b>	<b>115</b>	<b>1*</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8</b>
49	<b>Other assets not included in the GAR calculation</b>	<b>10.000</b>	-	-	-	-	-	-	-	-	-	-
50	Central governments and supranational issuers	4.626	-	-	-	-	-	-	-	-	-	-
51	Exposures to central banks	5.374	-	-	-	-	-	-	-	-	-	-
52	Trading portfolio	-	-	-	-	-	-	-	-	-	-	-
53	<b>Total assets</b>	<b>27.251</b>	-	-	-	-	-	-	-	-	-	-
	<b>Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive</b>	<b>268</b>	-	-	-	-	-	-	-	-	-	-
54	Financial guarantees	268	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.



1. Assets included for calculating the GAR (based on turnover) - continued

		Reference date for disclosure: 31.12.2024														
		Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+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)			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 use of proceeds		Of which use of proceeds		Of which use of proceeds		Of which use of proceeds		
		Of which enabling			Of which enabling			Of which enabling		Of which enabling		Of which enabling		Of which enabling		
30	Other forms of financing for local governments															
31	Collateral obtained by taking possession: residential and commercial immovable property															
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)															
33	Financial and non-financial undertakings															
34	SMEs and NFCs (other than SMEs) that are not subject to disclosure obligations under the Non-Financial Reporting Directive															
35	Loans and advances															
36	Of which loans collateralized by commercial immovable property															
37	Of which building renovation loans															
38	Debt securities															
39	Equity instruments															
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive															
41	Loans and advances															
42	Debt securities															
43	Equity instruments															
44	Derivative financial instruments															
45	Interbank loans on demand															
46	Cash and cash-related assets															
47	Other assets (for example, goodwill, commodities, etc.)															
48	<b>Total GAR assets</b>															
49	<b>Other assets not included in the GAR calculation</b>															
50	Central governments and supranational issuers															
51	Exposures to central banks															
52	Trading portfolio															
53	<b>Total assets</b>															
54	<b>Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive</b>															
55	Financial guarantees															
56	Assets under management															
57	Of which debt securities															
57	Of which equity instruments															

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.



## 2. Assets included for calculating the GAR (based on CapEx) - continued

		Reference date for disclosure: 31.12.2024											
		Climate Change Mitigation - CCM			Climate Change Adaptation - CCA			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)		
		Total (gross) carrying amount	Of which use of proceeds	Of which transitional enabling	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
30	Other forms of financing for local governments	1.944											
31	Collateral obtained by taking possession: residential and commercial immovable property	6	0	0	0	-	-	0	0	0	0	-	-
32	Other assets excluded from the numerator for calculating the GAR (included in the denominator)	10.264											
33	Financial and non-financial under takings	9.307											
34	SMEs and NFCs (other than SMEs) that are not subject to disclosure obligations under the Non-Financial Reporting Directive	9.299											
35	Loans and advances	9.212											
36	Of which loans collateralized by commercial immovable property												
37	Of which building renovation loans												
38	Debt securities												
39	Equity instruments	87											
40	Counterparties from non-EU countries that are not subject to disclosure obligations under the Non-Financial Reporting Directive	8											
41	Loans and advances	8											
42	Debt securities	-											
43	Equity instruments	-											
44	Derivative financial instruments	43											
45	Interbank loans on demand	-											
46	Cash and cash-related assets	514											
47	Other assets (for example, goodwill, commodities, etc.)	401											
48	Total GAR assets	17.251	112	1*	0	0	0	0	0	0	0	8	
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											
54	Off-balance-sheet exposures, Undertakings subject to disclosure obligations under the Non-Financial Reporting Directive	268	86										
55	Financial guarantees	268	86										
56	Assets under management												
57	Of which debt securities												
	Of which equity instruments												

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

2. Assets included for calculating the GAR (based on CapEx) - continued

		Reference date for disclosure: 31.12.2024												
		Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)						
		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Of which use of proceeds	Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Of which use of proceeds	Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Of which use of proceeds	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 advances, debt securities and equity instruments not eligible for the GAR calculation from the perspective of high-frequency trading													
2	Financial undertakings													
3	Credit institutions													
4	Loans and advances													
5	Debt securities, including use of proceeds (UoP)													
6	Equity instruments													
7	Other financial corporations													
8	Of which investment firms													
9	Loans and advances													
10	Debt securities, including use of proceeds (UoP)													
11	Equity instruments													
12	Of which management companies													
13	Loans and advances													
14	Debt securities, including use of proceeds (UoP)													
15	Equity instruments													
16	Of which insurance undertakings													
17	Loans and advances													
18	Debt securities, including use of proceeds (UoP)													
19	Equity instruments													
20	Non-financial undertakings													
21	Loans and advances													
22	Debt securities, including use of proceeds (UoP)													
23	Equity instruments													
24	Households													
25	Of which loans collateralized by residential immovable property													
26	Of which building renovation loans													
27	Of which car loans													
28	Financing for local governments													
29	Housing financing													

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.



3. GAR by sector (based on turnover)

Reference date for disclosure 31.12.2024											
Climate Change Mitigation - CDM		Climate Change Adaptation - CCA		Water and marine resources - WTR		Circular economy - CE					
Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive	Gross carrying amount	Of which environmentally sustainable (CCM)	Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive	Gross carrying amount	Of which environmentally sustainable (CCA)	Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive	Gross carrying amount	Of which environmentally sustainable (CE)
Breakdown by sector – 4-digit NACE level (code and label)											
1	146 – 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	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 motor vehicle 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 and seeds, retail sale of 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 – Other research and experimental development on natural sciences and engineering	1	-								
21	7219 – Other research and experimental development on natural sciences and engineering	4	-								
22	7711 – Renting and leasing of cars and light motor vehicles	10	-								

**3. GAR by sector (based on turnover) - continued**

		Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial corporations (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		Gross carrying amount		Gross carrying amount	
		mil. lei	Of which environmentally sustainable (PPC)	mil. lei	Of which environmentally sustainable (PPC)	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	146 - 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 motor vehicle 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 and seeds, retail sale of 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 - Other research and experimental development on natural sciences and engineering												
21	7219 - Other research and experimental development on natural sciences and engineering												
22	7711 - Renting and leasing of cars and light motor vehicles												

4. GAR by sector (based on CapEx)

Reference date for disclosure 31.12.2024

	Climate Change Mitigation - CCM		Climate Change Adaptation - CCA		Water and marine resources - WTR		Circular economy - CE	
	Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive	Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive	Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive	Non-financial corporations (subject to the Non-Financial Reporting Directive)	SMEs and other NFCs not subject to the Non-Financial Reporting Directive
	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei
1	146 - 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 motor vehicle 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 and seeds, retail sale of 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 - Other research and experimental development on natural sciences and engineering	1	-					
21	7219 - Other research and experimental development on natural sciences and engineering	4	-					
22	7711 - Renting and leasing of cars and light motor vehicles	10	-					

Breakdown by sector - 4-digit NACE level (code and label)

#### 4. GAR by sector (based on CapEx) - continued

	Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
	Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive		Non-financial corporations (subject to the Non-Financial Reporting Directive)		SMEs and other NFCs not subject to the Non-Financial Reporting Directive	
	Gross carrying amount	Of which environmentally sustainable (PPC)	Gross carrying amount	Of which environmentally sustainable (PPC)	Gross carrying amount	Of which environmentally sustainable (BIO)	Gross carrying amount	Of which environmentally sustainable (BIO)	Gross carrying amount	Of which environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)	Gross carrying amount	Of which environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)
	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei	mil. lei
1												
2												
3												
4												
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22												

5. GAR KPI on stock (based on turnover)

		Reference date for disclosure 31.12.2024														
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)
% (compared to total covered assets in the denominator)		Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
-	<b>GAR – Assets included in the numerator and denominator</b>															
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading	18,98%	1,81%	0,01%	0,02%	0,00%	-	-	-	-	0,12%	-	-	-	-	-
2	<b>Financial corporations</b>	19,81%	1,13%	0,05%	0,11%	0,02%	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	19,81%	1,13%	0,05%	0,11%	0,02%	-	-	-	-	-	-	-	-	-	-
4	Loans and advances															
5	Debt securities, including use of proceeds (UoP)															
6	Equity instruments															
7	Other financial corporations															
8	Of which investment firms															
9	Loans and advances															
10	Debt securities, including use of proceeds (UoP)															
11	Equity instruments															
12	Of which asset management companies															
13	Loans and advances															
14	Debt securities, including use of proceeds (UoP)															
15	Equity instruments															
16	Of which insurance undertakings															
17	Loans and advances															
18	Debt securities, including use of proceeds (UoP)															
19	Equity instruments															
20	<b>Non-financial corporations</b>	52,32%	0,23%	0,00%	0,00%	0,00%	-	-	-	-	1,17%	-	-	-	-	-
21	Loans and advances	52,32%	0,23%	0,00%	0,00%	0,00%	-	-	-	-	1,17%	-	-	-	-	-
22	Debt securities, including use of proceeds (UoP)															
23	Equity instruments															
24	<b>Households</b>	22,87%	3,56%	0,00%*	0,00%	0,00%	3,56%	0,00%*	0,00%	0,00%	-	-	-	-	-	-
25	Of which loans collateralised by residential immovable property	33,78%*	5,26%*	0,00%*	0,00%	0,00%	5,26%*	0,00%*	0,00%	0,00%	-	-	-	-	-	-
26	Of which building renovation loans															
27	Of which car loans															
28	<b>Financing for local governments</b>	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	-	-
29	Housing financing															
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	-	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	100,00%	3,79%	3,79%	0,00%	0,00%	3,79%	3,79%	0,00%	0,00%	-	-	-	-	-	-
32	<b>Total GAR assets</b>	7,69%	0,73%	0,00%*	0,01%	0,00%	0,67%	0,00%*	0,01%	0,00%	0,00%	0,00%	0,00%	0,05%	0,00%	0,00%

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

5. GAR KPI on stock (based on turnover) - continued

		Reference date for disclosure 31.12.2024											
		Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+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)			
		Of which use of proceeds		Of which enabling		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 advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading												
2	Financial corporations												
3	Credit institutions												
4	Loans and advances												
5	Debt securities, including use of proceeds (UoP)												
6	Equity instruments												
7	Other financial corporations												
8	Of which investment firms												
9	Loans and advances												
10	Debt securities, including use of proceeds (UoP)												
11	Equity instruments												
12	Of which asset management companies												
13	Loans and advances												
14	Debt securities, including use of proceeds (UoP)												
15	Equity instruments												
16	Of which insurance undertakings												
17	Loans and advances												
18	Debt securities, including use of proceeds (UoP)												
19	Equity instruments												
20	Non-financial corporations												
21	Loans and advances												
22	Debt securities, including use of proceeds (UoP)												
23	Equity instruments												
24	Households												
25	Of which loans collateralised by residential immovable property												
26	Of which building renovation loans												
27	Of which car loans												
28	Financing for local governments												
29	Housing financing												
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property												
32	Total GAR assets												

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

6. GAR KPI on stock (based on CapEx)

%(compared to total covered assets in the denominator)		Reference date for disclosure 31.12.2024																
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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 transitional		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling
-																		
1	<b>GAR – Assets included in the numerator and denominator</b> Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading	13,82%	1,60%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	<b>Financial corporations</b>	2,76%	0,04%	0,01%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
3	Credit institutions	2,76%	0,04%	0,01%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
4	Loans and advances	2,76%	0,04%	0,01%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	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 advances																	
10	Debt securities, including use of proceeds (UoP)																	
11	Equity instruments																	
12	Of which asset management companies																	
13	Loans and advances																	
14	Debt securities, including use of proceeds (UoP)																	
15	Equity instruments																	
16	Of which insurance undertakings																	
17	Loans and advances																	
18	Debt securities, including use of proceeds (UoP)																	
19	Equity instruments																	
20	<b>Non-financial corporations</b>	30,32%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and advances	30,32%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	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	<b>Households</b>	22,87%	3,56%	0,00%*	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	Of which loans collateralised by residential immovable property	33,78%*	5,26%*	0,00%*	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	Of which building renovation loans																	
27	Of which car loans																	
28	<b>Financing for local governments</b>	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing financing																	
30	Other forms of financing for local governments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	100,00%	3,79%	3,79%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	<b>Total GAR assets</b>	5,60%	0,68%	0,65%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

6. GAR KPI on stock (based on CapEx) - continued

		Reference date for disclosure 31.12.2024											
		Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+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)			
		Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
-	GAR - Assets included in the numerator and denominator												
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading												
2	Financial corporations												
3	Credit institutions												
4	Loans and advances												
5	Debt securities, including use of proceeds (UoP)												
6	Equity instruments												
7	Other financial corporations												
8	Of which investment firms												
9	Loans and advances												
10	Debt securities, including use of proceeds (UoP)												
11	Equity instruments												
12	Of which asset management companies												
13	Loans and advances												
14	Debt securities, including use of proceeds (UoP)												
15	Equity instruments												
16	Of which insurance undertakings												
17	Loans and advances												
18	Debt securities, including use of proceeds (UoP)												
19	Equity instruments												
20	Non-financial corporations												
21	Loans and advances												
22	Debt securities, including use of proceeds (UoP)												
23	Equity instruments												
24	Households												
25	Of which loans collateralised by residential immovable property												
26	Of which building renovation loans												
27	Of which car loans												
28	Financing for local governments												
29	Housing financing												
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property												
32	Total GAR assets												

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

7. GAR KPI on flow (based on turnover)

		Reference date for disclosure 31.12.2024															
		Climate Change Mitigation - CCM				Climate Change Adaptation - CCA				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-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)		Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)	
		Of which use of proceeds	Of which transitional	Of which enabling	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
-	% (compared to total covered assets in the denominator)																
-	<b>GAR – Assets included in the numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading																
2	<b>Financial corporations</b>																
3		0.43%	0.18%	0.05%	0.04%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
4	Credit institutions	7.56%	0.09%	0.06%	0.05%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5	Loans and advances	7.56%	0.09%	0.06%	0.05%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
6	Debt securities, including use of proceeds (UoP)																
7	Equity instruments																
8	Other financial corporations																
9	Of which investment firms																
10	Loans and advances																
11	Debt securities, including use of proceeds (UoP)																
12	Equity instruments																
13	Of which asset management companies																
14	Loans and advances																
15	Debt securities, including use of proceeds (UoP)																
16	Equity instruments																
17	Of which insurance undertakings																
18	Loans and advances																
19	Debt securities, including use of proceeds (UoP)																
20	Equity instruments																
21	<b>Non-financial corporations</b>	84.20%*	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
22	Loans and advances	84.20%*	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
23	Debt securities, including use of proceeds (UoP)																
24	Equity instruments																
25	<b>Households</b>	7.53%	1.01%	0.00%*	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
26	Of which loans collateralised by residential immovable property	100.00%	13.46%	0.00%*	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
27	Of which building renovation loans																
28	Of which car loans																
29	<b>Financing for local governments</b>	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
30	Housing financing																
31	Other forms of financing for local governments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
32	<b>Collateral obtained by taking possession: residential and commercial immovable property</b>	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
33	<b>Total GAR assets</b>	4.42%	0.20%	0.09%	0.02%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

7. GAR KPI on flow (based on turnover) – continued

		Reference date for disclosure 31.12.2024											
		Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+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		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 advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading												
2	Financial corporations												
3	Credit institutions												
4	Loans and advances												
5	Debt securities, including use of proceeds (UoP)												
6	Equity instruments												
7	Other financial corporations												
8	Of which investment firms												
9	Loans and advances												
10	Debt securities, including use of proceeds (UoP)												
11	Equity instruments												
12	Of which asset management companies												
13	Loans and advances												
14	Debt securities, including use of proceeds (UoP)												
15	Equity instruments												
16	Of which insurance undertakings												
17	Loans and advances												
18	Debt securities, including use of proceeds (UoP)												
19	Equity instruments												
20	Non-financial corporations												
21	Loans and advances												
22	Debt securities, including use of proceeds (UoP)												
23	Equity instruments												
24	Households												
25	Of which loans collateralised by residential immovable property												
26	Of which building renovation loans												
27	Of which car loans												
28	Financing for local governments												
29	Housing financing												
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property												
32	Total GAR assets												

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.



8. GAR KPI on flow (based on CapEx) - continued

		Reference date for disclosure: 31.12.2024											
		Pollution - PPC				Biodiversity and ecosystems - BIO				TOTAL (CCM+CCA+WTR+CE+PPC+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)			
		Of which use of proceeds		Of which enabling		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 advances, debt securities and equity instruments not eligible for GAR calculation from the perspective of high-frequency trading												
2	Financial corporations												
3	Credit institutions												
4	Loans and advances												
5	Debt securities, including use of proceeds (UoP)												
6	Equity instruments												
7	Other financial corporations												
8	Of which investment firms												
9	Loans and advances												
10	Debt securities, including use of proceeds (UoP)												
11	Equity instruments												
12	Of which asset management companies												
13	Loans and advances												
14	Debt securities, including use of proceeds (UoP)												
15	Equity instruments												
16	Of which insurance undertakings												
17	Loans and advances												
18	Debt securities, including use of proceeds (UoP)												
19	Equity instruments												
20	Non-financial corporations												
21	Loans and advances												
22	Debt securities, including use of proceeds (UoP)												
23	Equity instruments												
24	Households												
25	Of which loans collateralised by residential immovable property												
26	Of which building renovation loans												
27	Of which car loans												
28	Financing for local governments												
29	Housing financing												
30	Other forms of financing for local governments												
31	Collateral obtained by taking possession: residential and commercial immovable property												
32	Total GAR assets												

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1.

9. Off-balance-sheet exposures KPI (based on turnover)

Reference date for disclosure: 31.12.2024																							
% (compared to total covered assets in the denominator)	Climate Change Mitigation - CCM Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			Climate Change Adaptation - CCA Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			Water and marine resources - WTR Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			Circular economy - CE Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			Pollution - PPC Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			Biodiversity and ecosystems - BIO Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			TOTAL (CCM+CCA+WTR+CE+PPC+BIO) Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)				
	Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-aligned)				
	Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
1	45,5%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

**10. Off-balance-sheet exposures KPI (based on CapEx)**

Reference date for disclosure: 31.12.2024																						
% (compared to total covered assets in the denominator)	Climate Change Mitigation - CCM			Climate Change Adaptation - CCA			Water and marine resources - WTR			Circular economy - CE			Pollution - PPC			Biodiversity and ecosystems - BIO			TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
	Proportion of total covered assets 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)			Proportion of total covered assets financing taxonomy-relevant sectors (taxonomy-eligible)			
	Of which use of proceeds	Of which transitional	Of which enabling	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which use of proceeds	Of which enabling	Of which use of proceeds	Of which enabling
1	32,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

2. Standardised tables regarding economic activities in the energy sectors

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

Model 1 – Nuclear and fossil gas-related activities

Reference date for disclosure: 31.12.2025

Row	Nuclear energy-related activities	
1	The undertaking carries out, finances or has exposures to research, development, demonstration and deployment activities for innovative electricity generation facilities that produce energy from nuclear processes with minimum waste from the fuel cycle.	NO
2	The undertaking carries out, finances or has exposures to the construction and safe operation of new nuclear facilities for the generation of electricity or process heat, including for district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, finances or has exposures to the safe operation of existing nuclear facilities generating electricity or process heat, including for district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	<b>Fossil gas-related activities</b>	
4	The undertaking carries out, finances or has exposures to the construction or operation of electricity generation facilities that generate electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, finances or has exposures to the construction, refurbishment and operation of facilities combining the generation of heat/cooling and electricity using fossil gaseous fuels.	NO
6	The undertaking carries out, finances or has exposures to the construction, refurbishment and operation of heat generation facilities for heating/cooling using fossil gaseous fuels.	NO

Model 2 – Taxonomy-aligned economic activities (denominator) – based on turnover

Reference date for disclosure: 31.12.2025

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM + CCA		Climate Change Mitigation – CCM		Climate Change Adaptation – CCA	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission 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 Commission 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 Commission 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 Commission 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 Commission 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 Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 above in the denominator of the applicable key performance indicator</b>	493,02	2,82%	493,02	2,82%	493,02	2,82%
8	<b>Total applicable KPI</b>	493,02	2,82%	493,02	2,82%	493,02	2,82%

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM + CCA		Climate Change Mitigation – CCM		Climate Change Adaptation – CCA	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1-6 above in the numerator of the applicable key performance indicator</b>	493,02	100%	493,02	100%	-	-
8	<b>Total applicable KPI</b>	493,02	100%	493,02	100%	-	-

Model 4 – Taxonomy-eligible but not taxonomy-aligned economic activities – based on turnover		Reference date for disclosure: 31.12.2025					
		Proportion (information shall be presented in monetary amounts and percentages)					
Row	Economic activities	CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	-	-	-	-	-	-
2	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	-	-	-	-	-	-
3	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	-	-	-	-	-	-
4	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	35,21	0,20%	35,21	0,20%	-	-
5	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	-	-	-	-	-	-
6	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator.	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1-6 above in the denominator of the applicable key performance indicator</b>	824,11	4,72%	824,11	4,72%	-	-
8	<b>Total value and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the numerator of the applicable key performance indicator</b>	859,32	4,92%	859,32	4,92%	-	-

Model 5 – Taxonomy non-eligible economic activities – based on turnover		Reference date for disclosure: <u>31.12.2025</u>	
		Value (mil. lei)	Percentage
Row	Economic activities		
1	Value and proportion of the economic activity referred to in row 1 of Model 1 that is taxonomy non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
2	Value and proportion of the economic activity referred to in row 2 of Model 1 that is taxonomy non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
3	Value and proportion of the economic activity referred to in row 3 of Model 1 that is taxonomy non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
4	Value and proportion of the economic activity referred to in row 4 of Model 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
5	Value and proportion of the economic activity referred to in row 5 of Model 1 that is taxonomy non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
6	Value and proportion of the economic activity referred to in row 6 of Model 1 that is taxonomy non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
7	<b>Value and proportion of other taxonomy non-eligible economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	16.111,56	92,26%
8	<b>Total value and proportion of taxonomy non-eligible economic activities in the denominator of the applicable key performance indicator</b>	16.111,56	92,26%

Model 2 – Taxonomy-aligned economic activities (denominator) – based on CapEx

Reference date for disclosure: 31.12.2025

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission 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 Commission 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 Commission 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 Commission 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 Commission 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 Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	319,72	1,83%	319,72	1,83%	319,72	1,83%
8	<b>Total applicable KPI</b>	319,72	1,83%	319,72	1,83%	319,72	1,83%

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1–6 above in the numerator of the applicable key performance indicator</b>	319,72	100%	319,72	100%	319,72	100%
8	<b>Total value and proportion of taxonomy-aligned economic activities in the numerator of the applicable key performance indicator</b>	319,72	100%	319,72	100%	319,72	100%

Model 4 – Taxonomy-eligible but not taxonomy-aligned economic activities -based on CapEx		Reference date for disclosure: 31.12.2025					
		Proportion (information shall be presented in monetary amounts and percentages)					
Row	Economic activities	CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
2	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
3	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
4	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	35,21	0,20%	35,21	0,20%	-	-
5	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
6	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	Value and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator	831,70	4,76%	831,70	4,76%	-	-
8	Total value and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the numerator of the applicable key performance indicator	866,91	4,96%	866,91	4,96%	-	-

Model 5 – Taxonomy non-eligible economic activities – based on CapEx		Reference date for disclosure: 31.12.2025	
		Value (mil. lei)	Percentage
Row	Economic activities		
1	Value and proportion of the economic activity referred to in row 1 of Model 1 that is taxonomy non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
2	Value and proportion of the economic activity referred to in row 2 of Model 1 that is taxonomy non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
3	Value and proportion of the economic activity referred to in row 3 of Model 1 that is taxonomy non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
4	Value and proportion of the economic activity referred to in row 4 of Model 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
5	Value and proportion of the economic activity referred to in row 5 of Model 1 that is taxonomy non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
6	Value and proportion of the economic activity referred to in row 6 of Model 1 that is taxonomy non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
7	<b>Value and proportion of other taxonomy non-eligible economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	16.277,27	93,21%
8	<b>Total value and proportion of taxonomy non-eligible economic activities in the denominator of the applicable key performance indicator</b>	16.277,27	93,21%

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

Model 1 – Nuclear and fossil gas-related activities

Reference date for disclosure: 31.12.2024

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

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission 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 Commission 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 Commission 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 Commission 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 Commission 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 Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	126,74 *	0,73%*	126,74*	0,73%*	-	-
8	<b>Total applicable KPI</b>	126,74	0,73%	126,74	0,73%	-	-

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Model 3 – Taxonomy-aligned economic activities (numerator) – based on turnover

Reference date for disclosure: 31.12.2024

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1–6 above in the numerator of the applicable key performance indicator</b>	126,74	100%	126,74	100%	-	-
8	<b>Total value and proportion of taxonomy-aligned economic activities in the numerator of the applicable key performance indicator</b>	126,74	100%	126,74	100%	-	-

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Model 4 – Taxonomy-eligible but not taxonomy-aligned economic activities – based on turnover		Reference date for disclosure: 31.12.2024					
		Proportion (information shall be presented in monetary amounts and percentages)					
Row	Economic activities	CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
2	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
3	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
4	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,20	0,00%	0,20	0,00%	0,00%	-
5	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
6	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	1.198,87	6,95%	1.198,87	6,95%	6,95%	-
8	<b>Total value and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the numerator of the applicable key performance indicator</b>	1.199,07	6,95%	1.199,07	6,95%	6,95%	-

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Model 5 – Taxonomy non-eligible economic activities – based on turnover		Reference date for disclosure: 31.12.2024	
		Value (mil. lei)	Percentage
1	Economic activities Value and proportion of the economic activity referred to in row 1 of Model 1 that is taxonomy non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
2	Value and proportion of the economic activity referred to in row 2 of Model 1 that is taxonomy non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
3	Value and proportion of the economic activity referred to in row 3 of Model 1 that is taxonomy non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
4	Value and proportion of the economic activity referred to in row 4 of Model 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
5	Value and proportion of the economic activity referred to in row 5 of Model 1 that is taxonomy non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
6	Value and proportion of the economic activity referred to in row 6 of Model 1 that is taxonomy non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
7	<b>Value and proportion of other taxonomy non-eligible economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	15.924,99	92,31%
8	<b>Total value and proportion of taxonomy non-eligible economic activities in the denominator of the applicable key performance indicator</b>	15.924,99	92,31%

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission 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 Commission 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 Commission 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 Commission 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 Commission 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 Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	117,72	0,68%	117,72	0,68%	117,72	0,68%
8	<b>Total applicable KPI</b>	117,72	0,68%	117,72	0,68%	117,72	0,68%

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Model 3 – Taxonomy-aligned economic activities (numerator) – based on CapEx

Reference date for disclosure: 31.12.2024

Row	Economic activities	Value and proportion (information shall be presented in monetary amounts and percentages)					
		CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator 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 Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable key performance indicator	-	-	-	-	-	-
7	<b>Value and proportion of other taxonomy-aligned economic activities not referred to in rows 1–6 above in the numerator of the applicable key performance indicator</b>	117,72	100%	117,72	100%	-	-
8	<b>Total value and proportion of taxonomy-aligned economic activities in the numerator of the applicable key performance indicator</b>	117,72	100%	117,72	100%	-	-

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Model 4 – Taxonomy-eligible but not taxonomy-aligned economic activities – based on CapEx		Reference date for disclosure: 31.12.2024					
		Proportion (information shall be presented in monetary amounts and percentages)					
Row	Economic activities	CCM+CCA		Climate Change Mitigation		Climate Change Adaptation	
		Value (mil. lei)	%	Value (mil. lei)	%	Value (mil. lei)	%
1	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
2	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
3	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
4	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	0,20	0,00%	0,20	0,00%	-	-
5	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
6	Value and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-	-	-	-	-
7	Value and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator	847,60	4,91%	847,60	4,91%	-	-
8	Total value and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the numerator of the applicable key performance indicator	847,80	4,91%	847,80	4,91%	-	-

\* The values related to 2024 were revised compared to those previously reported. See section 7.2.1

Model 5 – Taxonomy non-eligible economic activities – based on CapEx		Reference date for disclosure: 31.12.2024	
		Value (mil. lei)	Percentage
1	Economic activities Value and proportion of the economic activity referred to in row 1 of Model 1 that is taxonomy non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
2	Value and proportion of the economic activity referred to in row 2 of Model 1 that is taxonomy non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
3	Value and proportion of the economic activity referred to in row 3 of Model 1 that is taxonomy non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
4	Value and proportion of the economic activity referred to in row 4 of Model 1 that is taxonomy non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
5	Value and proportion of the economic activity referred to in row 5 of Model 1 that is taxonomy non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
6	Value and proportion of the economic activity referred to in row 6 of Model 1 that is taxonomy non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable key performance indicator	-	-
7	<b>Value and proportion of other taxonomy non-eligible economic activities not referred to in rows 1–6 above in the denominator of the applicable key performance indicator</b>	16.285,28	94,40%
8	<b>Total value and proportion of taxonomy non-eligible economic activities in the denominator of the applicable key performance indicator</b>	16.285,28	94,40%

\*The values related to 2024 were revised compared to those previously reported. See section 7.2.1



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