



2025

BOARD

OF DIRECTORS

Report



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BANCA TRANSILVANIA IN 2025: SOLID PERFORMANCE, ABOVE-AVERAGE GROWTH, AND VALUE FOR INVESTORS AND SHAREHOLDERS

Dear investors and shareholders,

Thank you for the trust you place in us and for your continued support of Banca Transilvania's development strategy. Looking back on 2025, we are pleased to present the key achievements and developments that defined BT's journey during an intense year, marked by economic volatility, but also by opportunities that we were able to capitalize on.

2025 was a year in which Banca Transilvania continued to outperform the market average, consolidating its leading position. Consolidated net profit reached RON 4.66 billion, and assets grew to RON 224.4 billion, reflecting our ability to support large volumes of business while maintaining a balanced risk profile.

2025 was also a year of strategic execution. We completed two mergers – BT-OTP Bank Romania and Victoriabank-BCR Chişinău – and finalized two acquisitions with long-term impact: BRD Pensii and Microinvest. These transactions strengthen Banca Transilvania Group's position in banking, private pensions, and microfinance, expand our customer base, and diversify revenue sources – both in Romania and in the Republic of Moldova. The integration of these entities creates a solid foundation for operational and commercial synergies in the coming years.

For you, our investors and shareholders, 2025 was a year in which we continued to deliver value. We distributed dividends in two stages, totaling nearly RON 2.3 billion, reflecting our commitment to rewarding the trust placed in us while maintaining a balanced capital policy. At the same time, we maintained a solid capital position, with a capital adequacy ratio of 22.71%, which allows us to support future growth.

Banca Transilvania's Financial Performance

- BT's net profit in the fourth quarter of 2025 amounted to RON 1.17 billion, up 2.4% compared to the third quarter of the year and up 42.6% compared to the fourth quarter of 2024.
- The gross loans-to-deposits ratio rose to 62.6%, 5.4 percentage points higher than the level recorded in December 2024, driven by both acquired portfolios and the organic growth generated in a context of multiple challenges.
- The non-performing loans ratio (as per the EBA methodology) stood at 2.40% as of December 31, 2025, while the coverage ratio with total provisions for non-performing exposures was 178.9%, reflecting a prudent position and the quality of the portfolio.
- Net expenses, including impairment adjustments and expected losses on assets, as well as provisions for other risks and credit commitments, increased to RON 622.2

million, resulting in a cost of risk that remains below 1% (0.59%). These figures confirm the bank's controlled risk profile.

- The bank's cost-to-income ratio improved by nearly 1 percentage point (0.99 percentage points), reaching 44.39%, as a result of operational efficiencies implemented throughout 2025. Excluding the impact of the turnover tax – which adds nearly 5 percentage points – the cost-to-income ratio (C/I Ratio) would be 39.41%.
- Return on Equity (ROE) reached 25.23% in December 2025. BT's capital adequacy ratio stands at 22.71%, including the interim net profit for the first half of the year in its equity, which keeps the bank in a solid capital position, capable of supporting future growth.

The results reflect an efficient business model, financial discipline, and our ability to generate value.

2026, a year of growth, beyond the numbers

We entered this year with a robust business model, a strong capital structure, and a well-defined growth strategy. We are ready to capitalize on market opportunities and continue to build value in a sustainable manner – not only through scale, but also through the experience we offer our stakeholders. Growth in 2026 means more than just expansion: it means disciplined execution, responsible decisions, and a firm commitment to you, to our customers, and to the communities we are part of.

We remain dedicated to our role as the main lender of the Romanian economy, even during challenging periods. We continue to support companies, the population, and Romania's strategic projects with the same responsibility and rigor that have defined us in recent years.

We appreciate your trust and partnership. We understand the responsibility of managing the capital you entrust to us, and we remain committed to building long-term value with transparency, discipline, and vision. The story says we can.

Horia Ciorcilă

Chairman, Board of Directors
Banca Transilvania

Ömer Tetik

Chief Executive Officer
Banca Transilvania



LEADERSHIP AND STRATEGIC DIRECTION

- BT's business model, built on scale and impact
- Board of Directors
- Leaders' Committee

BT'S BUSINESS MODEL, BUILT ON SCALE AND IMPACT

Value for customers

We contribute to the prosperity of people and companies. We support plans and ideas through digital solutions, proximity, expertise, consultancy, customized products and services, as well as our contribution to the financial inclusion.

Resources

Employees, equity, interest income, fee and commission income, etc. Partnership with financing institutions, network, ATMs, POS terminals, apps, brand awareness.

Client segments

RETAIL | FREEMIUM APPROACH

Free

basic products accessed by the large mass of customers (current accounts, debit cards, basic packages of products and services). The approach ensures a critical mass of clients who can be subsequently contacted for cross/up-selling.

Premium

additionally chargeable products and services (credit cards, BT24, NeoBT, subscription to finance solution packages).

COMPANIES | SEGMENTED APPROACH

Specialization per business segments depending on the size of the business (Large Corporate, Mid Corporate, SME, Micro, Startups) and per field of activity: physicians and agribusiness.

Through specialization, we grow competences, develop the relationship with the clients and contribute to the creation of the largest ecosystem for the support of the Romanian entrepreneurs

Relationship with the clients

Integrated offer: banking, microfinance, consumer finance, lease, asset management, brokerage etc.
Consultancy & support in branches/agencies and call center, support via chatbots, self-service via internet banking, mobile banking, apps, customized services, social media.

Channels omnichannel

Branches/Agencies, call center, applications, chatbots, multifunctional ATMs and the BT website

Key activities

BT is a universal bank that provides banking services and products to all client segments and business lines in the financial sector.

Key partners

Service providers, solutions and technologies, fintechs, associations, authorities, consultants

Cost structure

Technology, digitalization, modernization of premises, taxes and fees

Income

Interest, fees and commissions

PILLARS OF THE BUSINESS MODEL

We support entrepreneurs

Responsible Growth

Non-stop banking

BOARD OF DIRECTORS



HORIA CIORCILĂ

Chairman
of the Board of Directors



THOMAS GRASSE

Vice-Chairman
of the Board of Directors
(Independent
Non-Executive Member)



IVO GUEORGUIEV

Independent
Non-Executive Member



VASILE PUȘCAȘ

Independent
Non-Executive Member



**MIRELA
BORDEA**

Independent
Non-Executive Member



**LUCYNA STANCZAK
-WUCZYNSKA**

Independent
Non-Executive Member



**FLORIN PREDESCU
VASVARI**

Independent
Non-Executive Member

LEADERS' COMMITTEE



**ÖMER
TETIK**

Chief Executive Officer



**CĂTĂLIN
CARAGEA**

Deputy CEO,
Chief Risk Officer



**GEORGE
CĂLINESCU**

Deputy CEO,
Chief Financial Officer



**ANDRZEJ
DOMINIAK**

Deputy CEO,
Chief Technology Officer



**OANA
ILĂȘ**

Deputy CEO,
Retail Banking



**TIBERIU
MOISĂ**

Deputy CEO,
MidCorporate and SMEs



**BOGDAN
PLEȘUVEȘCU**

Deputy CEO,
Chief Legal Officer



**LEONTIN
TODERICI**

Deputy CEO,
Chief Operations Officer



THE YEAR OF IMPACT AND ACCELERATION

- Banca Transilvania brand – magnetism, relevance and visibility
- Banca Transilvania & the community: engagement and social responsibility
- Artificial intelligence @BT – accelerated integration in 2025

BANCA TRANSILVANIA BRAND – MAGNETISM, RELEVANCE AND VISIBILITY

Banca Transilvania ranks third among Romania's most valuable brands

Banca Transilvania retains its third place in the ranking of the most valuable Romanian brands, with a significant increase of 34% compared to the previous year, brand value reaching EUR 856 million.

The [Brand Finance Romania 50](#) analysis was conducted by Brand Finance, a UK-based leader in standardized brand valuation.

Brand value refers to the net economic benefit a brand owner would obtain by licensing the brand on the market.

Each year, Brand Finance analyzes 6,000 of the world's largest brands and publishes over a hundred reports, two examples being the Brand Finance Romania 50 and the Brand Finance Banking 500.

Banca Transilvania's brand value increased by 39% in 2025, reaching USD 955 million

Banca Transilvania's brand value increased by 39% and reached USD 955 million, according to the [Brand Finance Banking 500 2025](#) report.

Ranked as an elite international brand, with an AAA+ rating, BT brand holds the 225th position in the ranking, moving up 27 spots from the 2024 ranking.

According to the algorithm developed by [Brand Finance](#), the bank also recorded a Brand Strength Index (BSI) score of 95.3/100, meaning it has maintained its position among the top 10 strongest banking brands in the global ranking for the fourth consecutive year.

The excellent ratings obtained by BT are based, according to the assessment, on the dimensions of *familiarity*, *reputation*, and *customer perception*, as well as strategic investments, constant engagement with the communities the bank is part of, a focus on digital transformation, and the integration of artificial intelligence into customer communication.

BT, among the top-ranked Romanian brands

Banca Transilvania ranks among the top five most recognizable Romanian brands, according to a study conducted by [Frappe Digital](#) (Daedalus Online). The top three positions are held by Dacia, Borsec, and Napolact, brands with a long tradition and strong visibility among consumers.

Banca Transilvania's ranking confirms the brand's consistency and its presence in people's daily lives, in a context where familiarity and trust play an essential role in public perception.

Brand unaided awareness, a key indicator of brand performance

The ranking was based on brand unaided awareness, one of the most relevant indicators in assessing a brand's strength. It measures brands spontaneously mentioned by respondents, without prompts or predefined lists, thus reflecting the brand's actual presence in the public's memory.

The study was conducted among the urban population of Romania, using a sample of over 1,000 respondents aged 18 to 65.

BANCA TRANSILVANIA & COMMUNITY: INVOLVEMENT AND SOCIAL RESPONSIBILITY

At Banca Transilvania, we believe that real impact is built day by day, step by step. We are the bank for entrepreneurs, investing in the communities we are part of, understanding that success is directly proportional to the prosperity of those around us.

In our 32 years of activity, we have supported Romanian entrepreneurs in generating long-term economic value, we have supported non-profit organizations in taking care of social capital, and we have encouraged performance in all its forms, from education and sports to art and environmental protection.

Social responsibility is a commitment. Thus, in 2025, we continued to be the engine that drives ideas, people, and resources, investing 87 million lei in over 380 projects across our country.

Resilience through education and digital safety

In 2025, we continued the two BT projects that strengthen Romanians' knowledge of financial education and prevention in the digital environment.

- „FIT” (i.e. Finance for Everyone): The platform through which we translated complex concepts related to savings and investing into accessible language. It became the most watched financial education platform in the country, involving over 40,000 active participants in the learning process.
- "Wait a minute before you click": The national campaign through which we contributed to reducing the risk of fraud, through timely prevention messages, dedicated campaigns, and quizzes addressed to BT customers, entrepreneurs, and the entire population.

Solidarity: Investing in the next generation

The hardest beginnings deserve the most support. The strategic project developed together with Mastercard and Salvați Copiii is a commitment for a period of three years, amounting to EUR 1.5 million, through which we will direct vital resources to maternity wards, medical staff, and premature newborns who need monitoring and specialized care.

Our care for the future did not stop there, it naturally extended into the digital environment, where we transformed the BT Pay app into an ecosystem of good deeds. At Banca Transilvania, we know one thing for sure: part of the bank's strength comes from its community, and this was reinforced in 2025 when customers donated over RON 2 million through BT Pay, and we doubled this gesture of kindness by supporting our long-term partners such as:

- The Blondie Association – The first air ambulance service dedicated to children
- Peditel – Free, round-the-clock pediatric medical assistance by phone
- Casa Bună – Educational, medical, and vocational support for a decent life
- Hope and Homes for Children – Building family homes for children and teenagers in orphanages

Whether we are involved in supporting children from vulnerable backgrounds or supporting young people, our role has been to build bridges between resources and needs.

A bank for everyone by increasing accessibility

Banca Transilvania is a universal bank, which means that we address all segments and serve all categories of customers. We strive to be a bank that is accessible to everyone.

Thus, in 2025, we continued to invest in accessibility, accelerating the pace of development of new solutions dedicated to people with special mobility, hearing, and visual needs by optimizing the Banca Transilvania website and the BT Pay app, as well as by adapting our services, products, and physical locations.

Currently, in one of Banca Transilvania's five physical locations, people with hearing impairments have access to information through sign language, with the help of specialized interpreters, via "Voci pentru mâini".

Culture and Identity

We support young artists and the access to art, encourage participation in a vibrant cultural life, and are proud promoters of festivals that put us on the world map. From the traditional TIFF festival (125,000 participants in 2025) to the innovative MINA Cluj immersive art museum, we have opened up even greater access to culture, while through partnerships with MARE, Art Encounters, and RAD Art Fair, we have supported culture as a form of dialogue and identity.

We have also continued the intergenerational dialogue, being constantly present at festivals such as UNTOLD, Electric, Beach Please! or Nostalgia, where we have gone beyond brand interactions, transforming BT into part of the communities formed by these experiences and events.

Performance and national pride

Sport means courage, discipline, and resilience, values that we actively cultivate at BT. We cover the entire spectrum, from mass sports to international excellence. We support major sporting events such as the Transylvania Open, a WTA 250 tournament that consolidates Romania's position on the tennis map, and the Sports Festival, one of the largest events dedicated to encouraging sport at the national level.

At the same time, we develop long-term partnerships with sports organizations and national federations. These include the Romanian Football Federation, the Romanian Basketball Federation, the Romanian Olympic and Sports Committee, as well as clubs and academies dedicated to training young athletes, such as U-Banca Transilvania and the Gheorghe Hagi Academy.

Roots for the future

Our responsibility towards the environment is one of Banca Transilvania's longest-standing commitments. With over 340,000 seedlings planted over the years, since 2014, over 90 hectares of land have been reforested, contributing to the restoration of fauna and biodiversity in Cluj, Bistrița-Năsăud, Călărași, and Bucharest.

We have continued our strategic partnership with Via Transilvanica – The Road that Unites. We support this project, which is close to our hearts and promotes the rural environment, attracting tens of thousands of tourists and breathing new life into local communities. Our partnership with Via Transilvanica is a symbol of our respect for rural and natural heritage, serving as a bridge between regions, traditions, and communities.

This is part of our impact on building a stronger and more united country. We continue to grow alongside the people and communities we are part of, transforming financial success into sustainable social impact, because when Romania does well, Banca Transilvania does well.

Banca Transilvania ranks first in terms of customer satisfaction among large banks in Romania, with 12 points above the market average (NPS – Net Promoter Score). Customers appreciate the quality of products and services, the professionalism of the team, and the infrastructure that makes banking easier.

ARTIFICIAL INTELLIGENCE @BT, ACCELERATED INTEGRATION IN 2025

The Banca Transilvania Group accelerated in 2025 the integration of artificial intelligence (AI) solutions, supporting both customer interactions and the efficiency of internal teams. In a context where the volume of information and customer expectations are increasing rapidly, AI is becoming more and more part of the communication and organizational processes.

More than 1.3 million people interacted last year with BT solutions that integrated artificial intelligence. Chatbots and the intelligent search and support option (AI Search) are now part of customers' everyday experience, offering fast, simplified, personalized and 24/7 assistance.

AI for Customers

- 550,000 people used AI Search on the Banca Transilvania Group websites last year, representing a 28% increase in 2025 compared to 2024.
- Over 700,000 people used the virtual assistant Chat BT in the BT Pay app during the past year, generating 1.5 million interactions since [its launch](#) in January 2025.

AI for Employees

- Launch of Alvolution, a program dedicated to transforming the way teams work, collaborate and innovate, through the responsible and effective adoption of AI technologies.
- Microsoft 365 Copilot and GitHub Copilot assistants, supporting the development of new, more efficient daily working habits.
- Integration of AI into selected processes of the BT Contact Center & Customer Care team to enhance efficiency in assisting customers.

Human Banking + AI

Our commitment is Human Banking + AI: combining the power of technology with the empathy and expertise of the [#peopleofBT](#).

Banca Transilvania has been a trailblazer in adopting AI in banking, starting with the launch of the first BT website chatbot in 2017. The evolution of BT's AI ecosystem is supported through partnerships with leading technology players such as [DRUID](#), [Microsoft](#) and [Crayon](#).

The adoption of AI is always about people – colleagues and customers – and about how we can make banking simpler, more intuitive and more human.



ROMANIA A DYNAMIC ECONOMY AND BANKING SECTOR IN 2025

- Macroeconomic trends that shaped the year
- Developments in the Romanian banking system
- Easy-to-access information through the BT Research online platform

MACROECONOMIC TRENDS THAT SHAPED THE YEAR

World Economy

In 2025, global economic activity expanded at a moderate pace, continuing the post-pandemic normalization phase but under persistent structural and geopolitical constraints. Economic growth remained uneven across regions, reflecting divergent inflation behavior, policy responses, and trade developments. According to IMF estimates, global GDP advanced by approximately 3.2%, broadly in line with the previous year but with notable cross-country differences.

Advanced economies recorded softer momentum, with aggregate growth easing to around 1.6%, as tighter financial conditions, weaker industrial output, and reduced external demand weighed on activity. By contrast, emerging markets and developing economies demonstrated stronger resilience, achieving an average expansion of roughly 4.2%, supported by domestic demand, demographic factors, and selective policy stimulus.

Disinflation progressed during 2025, although the decline in headline inflation proved more gradual than initially anticipated. In several major economies, price pressures stabilized above central bank targets, indicating persistent services inflation, wage rigidity, and second-round effects. This environment kept monetary authorities cautious, as premature easing risked reigniting inflation expectations.

Global trade patterns exhibited significant volatility. Early-year behavior was shaped by front-loading effects, particularly stronger U.S. imports and increased exports from Asia and the Eurozone, driven by expectations of higher tariffs. As trade tensions intensified later in the year, merchandise flows decelerated. Nevertheless, WTO projections suggest global goods trade still achieved growth of approximately 2.4% by year-end.

The balance of risks to the global outlook remained tilted to the downside, primarily reflecting geopolitical fragmentation, trade policy uncertainty, elevated sovereign debt vulnerabilities, and potential financial market repricing.

U.S. Economy

Economic growth in the United States moderated in 2025, with real GDP increasing by around 2.0%, down from the stronger performance observed in 2024. The deceleration was attributable to a combination of factors, including restrictive monetary policy transmission, adverse weather-related disruptions, and heightened uncertainty surrounding trade measures.

Despite slower headline growth, household consumption continued to serve as the principal engine of expansion. Labor income gains, accumulated savings buffers, and stable

employment conditions underpinned consumer spending, offsetting weaker business investment and softer manufacturing output.

Inflationary pressures persisted throughout much of the year. Average consumer price growth reached approximately 2.7%, reflecting sticky services inflation and cost pass-through effects linked to tariffs and wage adjustments. While inflation remained significantly below peak levels seen in prior years, progress toward the Federal Reserve's target was incomplete.

Labor market conditions remained comparatively robust. The unemployment rate edged higher to 4.2%, indicating mild cooling but still consistent with historically tight employment levels. Wage growth showed signs of moderation, suggesting gradual realignment between labor demand and supply.

Trade policy developments constituted a central theme in 2025. Newly imposed tariffs and the absence of durable multilateral agreements contributed to elevated uncertainty, influencing business sentiment, investment planning, and price expectations.

In summary, the U.S. economy was characterized by slower growth, persistent inflation frictions, and policy-driven uncertainties. Economic fundamentals remained solid, yet downside risks necessitated continued prudence in macroeconomic management.

Eurozone

The Eurozone economy displayed modest but improving growth in 2025. Quarterly GDP growth strengthened toward the end of the year, with fourth-quarter output rising by 0.4% q/q, translating into an estimated 1.5% annual growth rate. This performance modestly exceeded earlier expectations but masked considerable heterogeneity among member states.

Economic activity remained constrained by reduced industrial production, weaker external demand, and cautious consumer behavior. Germany and Italy experienced softer growth trajectories, while earlier contributions from Ireland – partly linked to pharmaceutical-related export flows – normalized during the year.

Inflation continued its downward adjustment, reaching approximately 1.9% by December 2025. The moderation was largely driven by easing energy price pressures and base effects. However, services inflation and price increases in food-related categories remained sources of upward pressure.

Monetary policy in the Eurozone gradually shifted toward a more accommodative stance as inflation receded. The European Central Bank maintained a data-dependent approach, balancing support for economic recovery with vigilance against premature easing.

External risks continued to influence the region's outlook. Trade frictions, geopolitical instability, and global demand softness weighed on confidence indicators and investment decisions.

Looking ahead, the European Commission's Autumn 2025 Economic Forecast projects real GDP growth in the Eurozone to slowly decline to 1.2% in 2026 and rebound at 1.4% in 2027. However, elevated uncertainty, both domestically and internationally, continues to weigh on the Eurozone economy, necessitating cautious optimism in growth projections.

Romanian Economy

Romania's economic evolution in 2025 was defined by moderate growth, macroeconomic adjustment pressures, and structural shifts in demand composition. Economic expansion remained positive but reduced, reflecting the combined effects of fiscal consolidation measures, persistent inflationary pressures, and weaker household consumption.

GDP exhibited volatility throughout the year. Official statistics indicate modest growth in 2025 of 0.6% (real GDP growth), although quarter-on-quarter data signaled a slight contraction (-1.9% q/q) at year end, suggesting temporary loss of momentum.

A notable feature of 2025 was the reconfiguration of growth drivers. Private consumption, previously the dominant contributor, decelerated as a result of tighter income conditions and elevated price levels. In contrast, gross fixed capital formation strengthened, supported by:

- Accelerated public infrastructure investment
- Enhanced absorption of EU structural funds
- Continued implementation of projects under the Recovery and Resilience Facility (RRF)
- Investments in transport, energy, and digitalization

Inflationary developments remained challenging. Headline inflation re-accelerated in the second half of the year, influenced by electricity price liberalization, indirect tax adjustments, and persistent services price pressures.

Fiscal consolidation represented a central policy priority. By December 2025, the general government deficit reached approximately 7.65% of GDP, reflecting revenue-enhancing measures (VAT and excise increases, tax base broadening) and expenditure discipline efforts.

2025 brought the weakening of the national currency beyond the psychological 5.0 EUR/RON level in the first half of the year as a result of the political uncertainty. In the following months, the EUR/RON exchange rate showed moderate depreciation of the Romanian RON against the Euro, as a result of the domestic economic pressures (fiscal consolidation weighing on growth and confidence).

The National Bank of Romania maintained a restrictive monetary stance, keeping the policy rate at 6.50%, alongside unchanged corridor facilities. The decision reflected inflation persistence and external risk considerations.

Financial markets showed resilience. Romania's capital market recorded improved liquidity, higher investor participation, and new valuation highs toward year-end, supported by sustained issuance activity and favorable sentiment.

Overall, Romania's macroeconomic environment in 2025 is defined by resilience and persistent vulnerabilities. Growth remains modest, constrained by fiscal consolidation, elevated inflation, and reduced household demand, while public investment and EU fund absorption have become the main engines of activity. Inflation, though expected to gradually moderate, remains high, and the fiscal deficit continues to test the country's credibility and market confidence.

Developments of main macro-financial indicators	2020	2021	2022	2023	2024	2025
GDP, real (% YoY)	-3.7	5.8	4.0	2.4	0.9	0.6
Inflation (IPC) (% YoY, annual average)	2.6	5.0	13.8	10.4	5.6	7.3
Unemployment (average, %)	6.1	5.6	5.6	5.5	5.4	6.0
Monetary policy rate (end of the year) (%)	1.50	1.75	6.75	7.00	6.50	6.50
ROBOR (3M) (% , annual average)	2.38	1.82	6.20	6.62	5.88	6.39
ROBOR (6M) (% , annual average)	2.46	1.94	6.35	6.78	5.91	6.51
EURIBOR (3M) (% , annual average)	-0.43	-0.55	0.36	3.43	3.57	2.18
EURIBOR (6M) (% , annual average)	-0.37	-0.52	0.69	3.69	3.48	2.20
EUR/RON, end of the year	4.8694	4.9481	4.9474	4.9746	4.9741	5.0985
USD/RON, end of the year	3.9660	4.3707	4.6346	4.4958	4.7768	4.3417
EUR/USD, end of the year	1.2271	1.1326	1.0666	1.1050	1.0354	1.1750

*Source: Eurostat, National Institute of Statistics, National Bank of Romania, European Central Bank

DEVELOPMENTS IN THE ROMANIAN BANKING SYSTEM

Banking sector

The National Bank of Romania (NBR) maintained its monetary policy rate at 6.5%, the lending facility at 7.5%, and the deposit facility at 5.5% (effective since August 8, 2024).

The minimum reserve requirement ratios for credit institutions' RON-denominated and foreign-currency-denominated liabilities were also kept unchanged at 8% for RON and 5% for foreign currency.

Non-government credit increased by 6.2% year-on-year in December 2025 (annual average growth: 8.3%), reaching a new all-time high of RON 447.3 billion.

Within non-government credit, the growth rate of loans granted to companies slowed to 3.6% year-on-year in December 2025, with an annual average increase of 6.7%.

Loans granted to households moderated to an 8.3% year-on-year growth rate in December, from 10% year-on-year in July. Thus, in 2025, household lending recorded an annual average growth rate of 9.3%. Housing loans rose by 6.5% year-on-year (annual average: 6%), while consumer loans increased by 11.1% year-on-year (annual average: 14.2%). Lending in local currency continued its upward trend (10.4% year-on-year; annual average: 12.2%), whereas euro-denominated lending followed a declining trend (-14.5% year-on-year; annual average: -16.2%).

Non-government deposits increased by 6.9% year-on-year in December 2025 (annual average growth: 7.2%).

Household deposits grew by 8.1% year-on-year (annual average: 9.7%). Within this category, overnight deposits recorded a deceleration (9.5% year-on-year; annual average: 12.2%), while term deposits increased by 6.9% year-on-year (annual average: 7.5%).

Corporate deposits accelerated to 3.7% year-on-year in December, compared to 1.2% year-on-year in October 2025. The annual average growth rate was 2.2%, down from 9.2% in 2024. Term deposits rose by 5.6% year-on-year (annual average: 1.5%), whereas overnight deposits increased by 2.4% year-on-year (annual average: 2.8%).

The loans-to-deposits ratio stood at 67.3% in December 2025, down from 68.8% in September 2025 and from 67.6% in December of the previous year.

EASY-TO-ACCESS INFORMATION THROUGH THE BT RESEARCH ONLINE PLATFORM

BT Research is Banca Transilvania's platform dedicated to macroeconomic analyses, economic forecasts, and the monitoring of essential indicators that shape the evolution of Romania's economy and financial markets. The platform provides quick access to data, insights, and relevant analyses, supporting informed decision-making both at institutional level and for the general public.

Relaunched and expanded in 2026, BT Research integrates into a unified format:

- **A synthesis of Romania's key macroeconomic indicators**, accompanied by Banca Transilvania's outlook;

- **Interactive charts** illustrating economic developments over the past 10 years;
- **Thematic analyses**, including studies on Romania's external economic relations;
- **Opinions from international economists**, such as analyses dedicated to the European economic context ([„The European Outlook for 2026: Risks and Opportunities in a Changing World”](#)).

The platform was officially presented at **the Central & Eastern European Forum**, an event organized by Financial Times Live in Vienna, highlighting its role as a strategic tool for delivering economic knowledge in an accessible and up-to-date manner.

Through BT Research, Banca Transilvania reinforces its commitment to contributing to **financial well-being and safety** by providing rigorous, relevant, and user-friendly analyses. The platform integrates economic research, financial market dynamics, economic cycles, and public policy perspectives, offering a comprehensive view of the trends shaping the economic landscape.

Access to BT Research is available directly through the Bank's website or by subscribing to the monthly newsletter, which delivers updates on economic indicators, market trends, and specialized analyses.



4

SHAREHOLDERS, INVESTORS AND BT'S RELATIONSHIP WITH THE CAPITAL MARKET

- Shareholding structure
- BT share performance on the capital market in 2025
- Relationship and communication with investors and shareholders
- 2026 financial communication calendar
- Profit distribution proposal for the financial year 2025

SHAREHOLDING STRUCTURE

Shareholders	31.12.2025	31.12.2024
NN Group (*)	9.37%	9.37%
European Bank for Reconstruction and Development	5.16%	5.16 %
Romanian individual shareholders	25.15%	24.21 %
Romanian companies	45.56%	45.20 %
Foreign individual shareholders	1.17%	1.11%
Foreign companies	13.59%	14.95%
Total	100.00%	100.00%

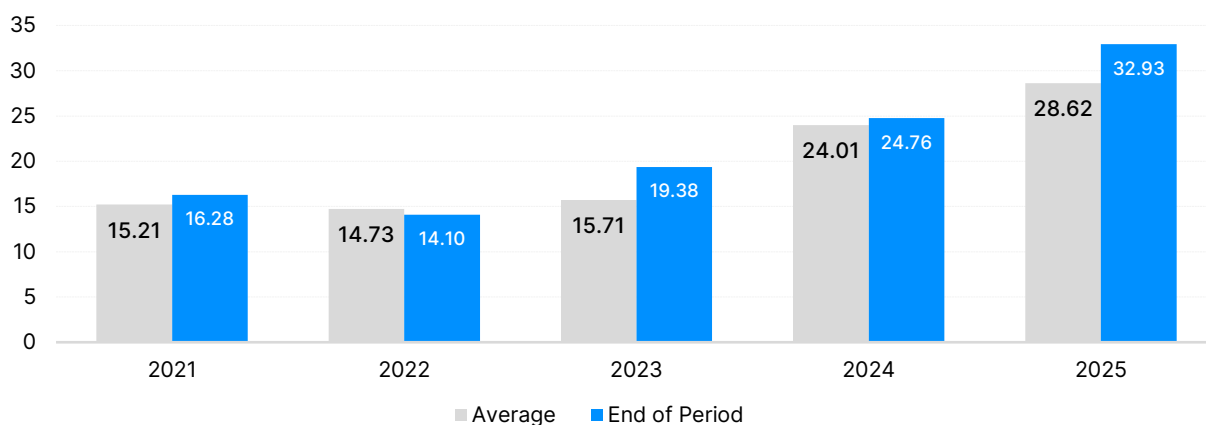
(*) NN Group N.V. and pension funds managed by NN Pensii SAFPAP S.A. and NN Asigurări de Viață S.A.

BT SHARE PERFORMANCE ON THE CAPITAL MARKET IN 2025

In 2025, Banca Transilvania's stock price return (TLV symbol), adjusted for the stock dividends paid in July, was 33.0%¹, while the BET index rose 46.2%. The total return of the stock (i.e. considering the cash dividends paid in June and December) was 45.0%, compared to BET-TR's 55.2% return.

Market capitalization, 2021 - 2025

RONbn



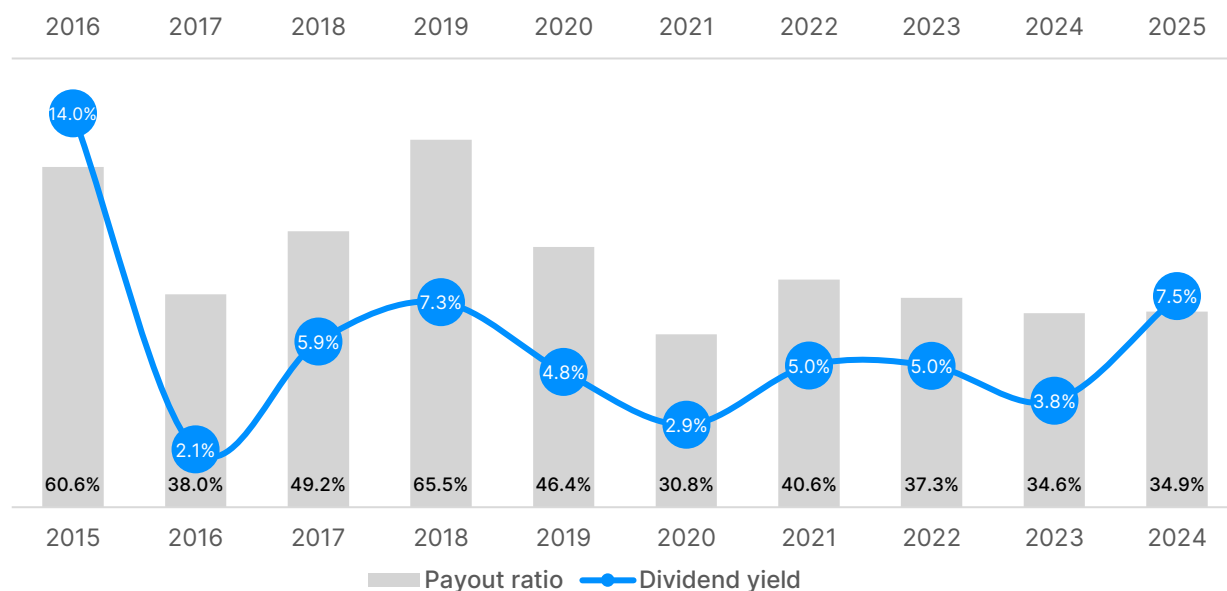
Source: EquityRT

¹ The unadjusted return was 11.9%.

Date	Price (adjusted, except cash dividends)	No. shares	Capitalization (RON billion)	Capitalization (EUR billion)
31 dec. 2025	30.20	1,090,322,225	32.93	6.46
31 dec. 2024	22.70	916,879,846	24.76	4.97
31 dec. 2023	17.78	798,658,233	19.38	3.89
31 dec. 2022	12.93	707,658,233	14.10	2.85
31 dec. 2021	14.87	6,311,469,680	16.28	3.29

*Source: EquityRT

In April, shareholders approved the distribution of a cash dividend amounting to c. RON 1.59 billion, corresponding to a dividend per share of approximately RON 1.73, which was paid in June. In July, Banca Transilvania increased its share capital by c. RON 1.73 billion via the transfer of retained earnings from the FY24 net profit and the issuance of a stock dividend. In October, shareholders approved a cash dividend of RON 700 million (around RON 0.64 per share) from FY15, FY16, and FY19 retained earnings, which was paid in December. In addition, the Bank conducted buybacks worth RON 147 million throughout 2025.



Note: The dividend payout ratio is calculated as the total dividends declared for the financial year divided by the consolidated net profit attributable to the Bank's shareholders. It is displayed on the primary (lower) horizontal axis, which reflects the fiscal years.

The dividend yield is defined as the dividend per share divided by the unadjusted share price on the trading day immediately preceding the ex-dividend date. In years with multiple distributions, individual yields are aggregated. Dividend yields are displayed on the secondary (upper) horizontal axis, which reflects the calendar years in which the distributions were made. Price adjusted for reverse stock splits and stock dividends.

Source: Company data, EquityRT, BTCP calculations.

RELATIONSHIP AND COMMUNICATION WITH INVESTORS AND SHAREHOLDERS

At the end of 2025, Banca Transilvania had over 72,000 shareholders, and the average pace of nearly 500 new investors per month confirms the sustained interest in BT as an investment opportunity. This trend is supported by the Bank's solid financial performance, reputation and resilience, as well as the confidence in its role as a leader in the banking sector in Romania and South-Eastern Europe, and as a key player in the capital market.

Communication with shareholders, investors and analysts is one of BT's priorities, as we aim to maintain a transparent and ongoing dialogue with this community.

BT Communication Ecosystem

- The online [Investor Relations](#) platform serves as the central hub for financial communication, providing access to results, presentations, reports, plans, updates, and other resources essential for investment analysis.
- Ongoing dialogue with investors, shareholders, and analysts is supported through dedicated meetings, events such as the [General Shareholders' Meeting](#) or [Investor Day](#), [videoconferences](#) and direct interactions, ensuring openness, transparency, and continuous engagement.

We communicate with the market through several BT Group companies, as well as via the Bucharest Stock Exchange www.bvb.ro/TLV:

- Banca Transilvania, www.bancatransilvania.ro/relatii-investitori; investor.relations@btrl.ro
- BT Capital Partners, www.btcapitalpartners.ro
- BT Asset Management, www.btam.ro
- BT Pensii, www.btpensii.ro

VEKTOR Rating 10/10

The Bank obtained a VEKTOR rating of 10/10 for investor communication in 2025, both as an equity and bond issuer, following the assessment conducted by ARIR.

2026 FINANCIAL COMMUNICATION CALENDAR

February

- February 27: Presentation of the preliminary financial results for 2025

March

- March 02: BT Video Conference for the presentation of the financial results
- March 27: Presentation of the Annual Report 2025

April

- April 28: General Meeting of Shareholders – first convening
- April 29: General Meeting of Shareholders – second convening

May

- May 22: Presentation of the Q1 2025 financial results
- May 25: Conference for the presentation of the results

August

- August 21: Presentation of the H1 2025 financial results
- August 24: Conference for the presentation of the results

November

- November 20: Presentation of the Q3 2025 financial results
- November 23: Conference for the presentation of the results

PROFIT DISTRIBUTION PROPOSAL FOR THE FINANCIAL YEAR 2025

The Board of Directors submitted for approval by the General Shareholders' Meeting (GSM) the proposal to distribute the net profit amounting to RON 4,095,289,537 as follows:

Proposal for 2025 profit distribution	Amounts (RON)
Net profit 2025	4,095,289,537
5% Legal reserve fund from gross profit	(241,182,226)
Net profit to be distributed	3,854,107,311

The Board of Directors proposes for approval to increase the Bank's paid share capital from RON 10,903,222,250 to RON 12,475,866,500, with the amount of RON 1,572,644,250, representing reserves from the 2025 net profit. The increase in the share capital will be carried out by issuing a number of 157,264,425 shares, with a nominal value of RON 10/share in the benefit of the shareholders registered with the Shareholding Register held by the Central Depository at the registration date that will be established by the GMS following that the price for the compensation of the fractions of shares resulting from the application of the algorithm and the rounding of the results, to be determined in accordance with the legal provisions in force. The Board of Directors proposes for approval the distribution of profits by granting dividends amounting to RON 1,400,000,000 and the amount of RON 881,463,062 is distributed in retained earnings.. The gross dividend per share amounts to RON 1.2840240875.

Following the implementation of the resolution adopted by the General Meeting of Shareholders regarding the allocation of the net profit for the 2025 financial year, the capital ratios as at 31 December 2025 will become: Common Equity Tier 1 ratio of 18.62%, Tier 1 capital ratio of 21.55%, and Total Capital Ratio (solvency ratio) of 23.56%.

Proposal for 2025 profit distribution**Amounts (RON)**

Total available reserves for distribution	3,854,107,311
Retained earnings	700,000,000
Dividends	1,400,000,000
Distribution related to AT1 instruments	181,463,062
Capitalization of 2025 net profit reserves	1,572,644,250
Share capital at recording date*	10,903,222,250
Yield per share % capitalization	0.14423664985

*The share capital registered with the Trade Register amounts to 1,090,322,225 shares with a nominal value of 10 RON / share.

The distribution related to the AT1 instruments will be recorded as a payment obligation in EUR on the date on which the proposal for the allocation of the profit for the 2025 financial year is approved by the General Meeting of Shareholders (GMS). The payment will be made in two instalments, the first on May 27, 2026 and the second on November 27, 2026, subject to the fulfilment, at the relevant dates, of the conditions applicable to distributions related to AT1 instruments.

The total amount of the distributions related to the AT1 instruments, established in accordance with the issuance prospectus, is EUR 35,625,000. The RON equivalent of 181,463,062 was calculated using the exchange rate of 1 EUR = 5.0937 RON as of March 11, 2026. The final value in RON will be higher or lower depending on the evolution of the EUR/RON exchange rate until the date the payment obligation in EUR is recorded.



2025 IN RETROSPECT CONSOLIDATION, RESILIENCE AND IMPACT

- Financial results
- Acquisitions, integrations, mergers – the most dynamic year in BT Group's history
- Banca Transilvania Financial Group
- Romania
 - Banca Transilvania
 - Salt Bank
 - BT Capital Partners
 - BT Asset Management
 - INNO Investments
 - BT Pensii
 - BT Leasing Transilvania
 - BT Broker de Asigurare
 - BT Microfinanțare (BT Mic)
 - BT Direct
 - Improvement Credit Collection
- Republic of Moldova:
 - Victoriabank
 - BT Leasing MD
 - Microinvest
- Awards and recognitions – validating a highly dynamic year

FINANCIAL RESULTS

The following section provides a presentation of the financial performance of Banca Transilvania and the BT Financial Group, highlighting the main results, strategic progress and factors that influenced our activity during the reporting period:

Financial Information of the Group*	BANK		GROUP	
	2025	2024	2025	2024
ROE (Net profit/ average equity)	25.23%	27.02%	24.84%	30.20%
ROA (Net profit/ annual average of total assets at net value)	2.06%	2.06%	2.23%	2.52%
Cost/income	44.39%	45.38%	46.66%	48.30%
Total net income, RON mn.	9,786	8,224	11,661	10,061
Provisions for credit risk, RON mn.	(622)	(332)	(832)	(575)
Gross profit, RON mn.	4,819	4,160	5,510	5,442
Net profit, RON mn.	4,095	3,532	4,661	4,731
Basic earnings per share			4.1119	4.1809
Diluted earnings per share			4.1119	4.1809
Tier 1 own funds, RON mn.	17,961	14,413	19,549	16,708
Risk Weighted Assets, RON mn.	86,756	69,206	99,132	87,865
Total Assets, RON mn.	210,398	184,264	224,414	207,035
Total Equity**, RON mn.	20,092	14,219	23,298	17,437
<i>Other information</i>				
Number of agencies, branches and offices	531	513		
Active number of employees	10,180	9,744	13,361	13,629

*Due to rounding, the numbers presented in this document may not add up exactly to the total presented and the percentages may not accurately reflect absolute numbers.

**Including Non-controlling interest

ACQUISITIONS, INTEGRATIONS, MERGERS – THE MOST DYNAMIC YEAR IN BT GROUP'S HISTORY

BT Group carried out two simultaneous mergers, in Romania and the Republic of Moldova: Banca Transilvania – OTP Bank Romania and Victoriabank – BCR Chişinău. Two strategic acquisitions were also completed: BRD Pensii, Pillar 2 and Pillar 3 private pensions player, and Microinvest, the market leader in microfinance in the Republic of Moldova.

Merger of OTP Bank Romania S.A. and BT Building S.R.L. with Banca Transilvania S.A.

The mergers between Banca Transilvania S.A. and OTP Bank Romania S.A. and Banca Transilvania S.A. and BT Building S.R.L. were successfully completed on February 28, 2025. The merger has brought significant benefits to both banks' customers, giving them access to an extensive ecosystem of banking and complementary solutions.

Merger of BCR Chisinau S.A. with Victoriabank S.A.

On March 01, 2025, Victoriabank S.A. completed its merger with BCR Chisinau S.A. The assets of the absorbed entity were transferred entirely and universally to Victoriabank S.A., thereby consolidating its position in the banking market of the Republic of Moldova. This merger has no impact on consolidated and separate financial statements of Banca Transilvania S.A.

Acquisitions

On October 2, 2025, Victoriabank S.A. acquired 100% of the shares in O.C.N. Microinvest S.R.L. Chisinau. The subsidiary of Victoriabank S.A. is controlled by Banca Transilvania S.A., therefore, starting with this date Banca Transilvania S.A. also has control of O.C.N. Microinvest S.R.L.. Through this acquisition, the Group strengthens its position on the banking market in the Republic of Moldova.

The group acquired in November 2025 100% of the stake in BRD Societate de Administrare a Fondurilor de Pensii Private S.A., thus obtaining control in this company. The acquisition did not have a significant impact on the Group's financial position and performance.

BANCA TRANSILVANIA FINANCIAL GROUP

The BT Financial Group is the largest ecosystem dedicated to supporting Romanian entrepreneurs, offering integrated services in banking, brokerage, investment management, leasing, consumer financing and voluntary pensions. The Group's structure includes Banca Transilvania, as the parent company, along with its subsidiaries in Romania, Italy and the Republic of Moldova. As of December 31, 2025, the BT Group had 13,361 employees (2024: 13,629 employees).

ROMANIA

Banca Transilvania S.A.

Banca Transilvania (BT) is the largest bank in Romania in terms of total assets. Approximately 5 million customers use the services of Banca Transilvania. The Bank carries out its banking activity through its head office located in Cluj-Napoca and 42 branches, 475 agencies, 3 work units, 8 healthcare division units, 2 private banking agencies in Romania, 1 branch in Italy and 1 regional office located in Bucharest and 1 Head Office located in Bucharest (December 31, 2024: 1 Head Office located in Cluj-Napoca, 42 branches, 457 agencies, 3 work units, 8 healthcare division units, 2 private banking agencies in Romania, 1 branch in Italy and 1 regional office located in Bucharest, and 1 Head Office located in Bucharest).

- The number of active employees of the bank as of 31.12.2025 was 10.180 (9,744 as of 31.12.2024).
- Headquarters: Cluj-Napoca, 30-36 Calea Dorobanților Street, 400117.
- BT was founded in 1993 and the activity started in 1994.

The subsidiaries of BT Financial Group are the following, in which the bank has direct and indirect participations:

Subsidiary	Field of activity	% of direct and indirect stake 2025	% of direct and indirect stake 2024
Victoriabank S.A.	Financial and banking activities and investments subject to license	44.63%	44.63%
BCR Chișinău S.A.	Financial and banking activities and investments subject to license	-	44.63%
BT Capital Partners S.A.	Investments	99.62%	99.62%
BT Leasing Transilvania IFN S.A.	Leasing	100%	100%
BT Investments S.R.L.	Investments	100%	100%
BT Direct IFN S.A.	Consumer loans	100%	100%
BT Building S.R.L.	Investments	-	100%
BT Asset Management SAI S.A.	Asset management	100%	100%
BT Solution Asistent în Brokeraj S.R.L.	Insurance broker	-	100%
BT Asiom Agent de Asigurare S.R.L.	Insurance broker	-	100%
BT Safe Agent de Asigurare S.R.L.	Insurance broker	-	100%
BT Intermedieri Agent de Asigurare S.R.L.	Insurance broker	-	100%
BT Leasing MD S.R.L.	Leasing	100%	100%
BT Microfinanțare IFN S.A.	Other lending activities	100%	100%
Improvement Credit Collection S.R.L.	Activities of collection agents and Credit reporting bureaus	100%	100%
VB Investment Holding B.V.	Activities of holdings	61.82%	61.82%
BT Pensii S.A.	Pension fund management (except for those in the public system)	100%	100%
Salt Bank S.A.	Financial and banking activities and investments subject to license	100%	100%
Avant Leasing IFN S.A.	Financial leasing	-	100%
BT Broker de Asigurare S.R.L.	Insurance broker	100%	100%
BTP One S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP STORE HUB TURDA S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
OTP Bank România S.A.	Financial and banking activities	-	100%

Inter Terra S.R.L.	Buying and selling of own real estate	99.73%	100%
OTP Advisors S.R.L.	Other activities auxiliary to financial services, except insurance and pension funding	-	100%
REA Project One Company S.R.L.	Real Estate Development	-	100%
GOVCKA Project Company S.R.L.	Real Estate Development	-	100%
OTP Consulting Romania S.R.L.	Auxiliary Financial Intermediation Activities, excluding insurance and pension funds	-	100%
Inno Investments S.A.I. S.A.	Asset Management	100%	100%
O.C.N. Microinvest S.R.L.	Other lending activities	44.63%	-
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	Pension fund management (except for those in the public system)	100%	-

The most relevant subsidiaries of the BT Group, in which the bank has direct participation:

Subsidiary	Activity	% Direct Participation	% Total Participation
BT Capital Partners S.A.	Investments	99.62%	99.62%
BT Leasing Transilvania IFN S.A.	Leasing	65.25%	100.00%
BT Investments S.R.L.	Investments	100.00%	100.00%
BT Direct IFN S.A.	Consumer loans	98.68%	100.00%
BT Asset Management SAI. S.A.	Asset management	100.00%	100.00%
BT Leasing MD S.R.L.	Leasing	100.00%	100.00%
BT Microfinanțare IFN S.A.	Other lending activities	67.80%	100.00%
Improvement Credit Collection S.R.L.	Activities of collection agents and Credit reporting bureaus	99.89%	100.00%
VB Investment Holding B.V.	Activities of holdings	61.82%	61.82%
Salt Bank S.A.	Financial and banking activities and investments subject to license	99.69%	100.00%
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	Pension fund management (except for those in the public system)	99.09%	100.00%

Based on the concept of materiality, as defined in paragraph 7 of IAS 1, the Group has decided to exclude several subsidiaries from the consolidation perimeter, as their exclusion does not have a significant impact on the consolidated financial statements. The decision to exclude them from consolidation is based on an assessment of both quantitative and qualitative factors, including the size criteria of the subsidiaries and their insignificant impact on the Group as a whole.

The list of subsidiaries excluded from the consolidation perimeter and the reasons for their exclusion can be found in detail in Note 1 of the Consolidated and Individual Financial Statements for the financial year ending December 31, 2025.

Assets and net profits of the most relevant subsidiaries in which the bank holds direct participation:

Subsidiary	Total assets (RON million)		Net profit (RON million)	
	2025	2024	2025	2024
BT Leasing Transilvania IFN S.A.	6,786	6,169	379.8	193.0
Salt Bank S.A.	2,219	1,253	(244.5)	(152.5)
BT Microfinanțare IFN S.A.	1,563	1,218	88.5	72.3
BT Direct IFN S.A.	1,301	1,149	48.8	52.1
BT Capital Partners S.A.	1,245	880	37.8	25.5
VB Investment Holding B.V.	285	308	50.9	31.0
BT Asset Management SAI S.A.	296	189	49.1	37.5
BT Leasing MD S.R.L.	181	161	6.6	6.2
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	128	-	(0.03)	-
BT Investments S.R.L.	103	103	(0.2)	3.1
Improvement Credit Collection S.R.L.	40	35	15.3	12.6
OTP Bank S.A.*	-	16,750	-	48.9
BT Building S.R.L.	-	267	1.3	6.2

Note: Figures according to Individual Financial Statements

*OTP Bank S.A. took part in the consolidated BT Group financials statements reports starting September 2024 until February 28, 2025 when the merger with BT took place.

Salt Bank S.A.

Salt Bank is the first neobank developed entirely in Romania, a fully digital financial institution that aims to redefine the interaction between the customer and banking services. Launched in March 2024, the bank mainly addresses the mass affluent segment and young professionals in urban areas, offering products and services exclusively through a modern and efficient mobile application.

With the mission of representing "a leap in banking and a leap in technology, for those who do not want to stay in their bank", Salt Bank aims to offer relevant financial solutions, built around an intuitive platform, competitive products and a high level of security for customer data and funds. All services are developed starting from three strategic pillars: simplicity of use, product quality and operational safety.

Salt Bank pays special attention to the user experience, offering a clear, easy-to-navigate digital interface, along with cards with distinctive designs. Customer support is managed

through a dedicated center – Care Center – where interactions are characterized by professionalism, promptness and a communication style adapted to the brand's values. All communication channels – from the app to customer service – are aligned to maintain a coherent, modern and user-friendly identity.

The year 2025 had 3 strategic objectives: attracting customers, continuing to deliver new functionalities and products to generate revenue, as well as starting cost control. To these were added a series of quantitative objectives and qualitative objectives.

The product portfolio has experienced accelerated development since the bank's launch in March 2024 until now. This expansion of the offerings has directly contributed to the increase in the number of customers and to the intensification of transactional activity through the SALT mobile application.

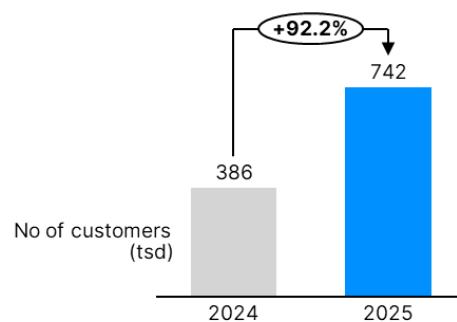
Compared to the functionalities already launched the previous year, in 2025 the SALT application added new ones such as:

- paying utility bills directly in the app (PayBill)
- Subscription Manager - service that provides information to customers about the merchants with whom they save their cards/subscriptions
- road assistance
- Call Monitor – anti-fraud tool that provides the customer with the information of a call from the bank
- consumer loans for individuals
- Help Mama - protection tool for senior customers
- sale of auto RCA insurance
- EUR and USD deposits for individuals
- top-up card via Google Pay and Apple Pay
- integration with Ropay (payments based on the beneficiary's phone number)
- investments in mutual funds, foreign equities, and traded investment funds (ETFs)
- instant receipts and payments in euros.

In addition to the above, if until 2024 the product offer was addressed only to individuals, starting with 2025 SALT has also diversified its products towards the freelancer segment, with a current account, business card, payment functions, integration with electronic invoicing services and savings spaces.

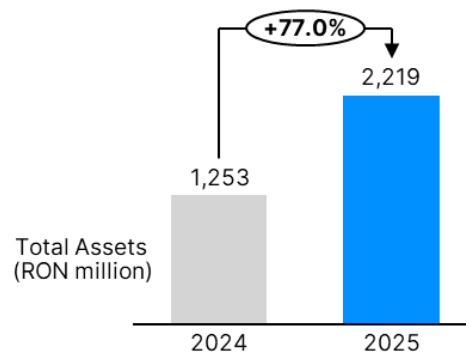
Investments in mutual funds, stocks, and ETFs have become a central element in the bank's service ecosystem. They provide customers with access to a diversified range of financial instruments traded on international exchanges, updated in real time in the app, strengthening Salt Bank's position as a provider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

In terms of the number of customers, during 2025 Salt Bank almost doubled its number of customers, reaching 742,000, compared to 386,000 at the end of 2024, which places Salt Bank in the top 10 credit institutions in Romania by number of customers.

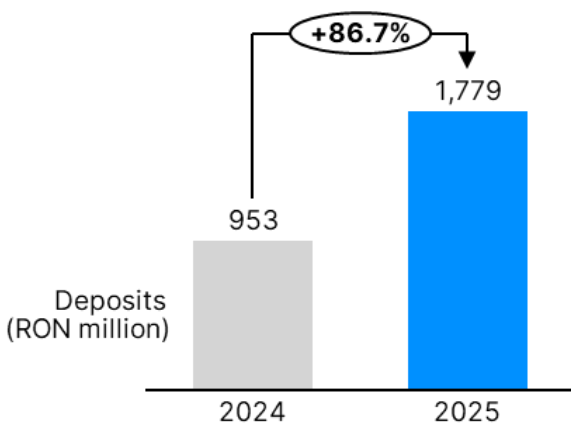


Total assets as of 31.12.2025* are RON 2,219 million, up 77% compared to 2024.

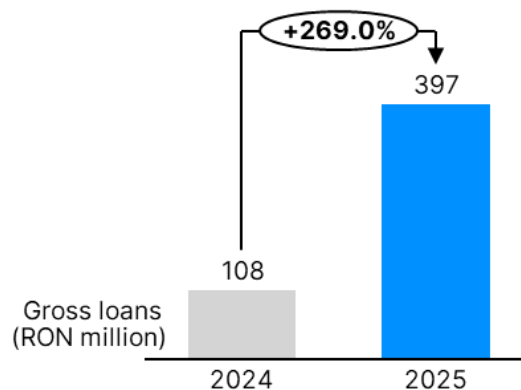
* unaudited data



The volume of deposits and current accounts held by the bank's customers reached RON 1,779 million, representing an increase of approximately 87% compared to 2024.



The gross loan portfolio reached RON 397 million, with the bank's portfolio currently including the personal loan product, which has registered an accelerated growth since its launch in April 2025.



Net loss after taxes for 2025: RON 244,5 million (RON 152,5 million in 2024).

Number of active employees as of 31.12.2025: 424 (320 as of 31.12.2024).

Security is integrated into the bank's technology architecture through robust measures such as the one-device-one-customer model, additional passwords for high-value transactions, exclusion of sensitive information from physical cards, blocking of screenshots in the app, and additional functionalities such as Transaction Map and display of the real business name for transactions. Salt Bank has assumed the objective of introducing new functionalities annually that increase the level of protection or address the needs of vulnerable categories of customers.

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

BT Capital Partners S.A.

BT Capital Partners (BTCP) is the investment banking and capital markets division of Banca Transilvania Financial Group. BT Capital Partners offers consulting services for fund raising on the capital market, consultancy on mergers and acquisitions, brokerage services, structuring of complex financing schemes, market research and strategic advisory. BT Capital Partners is the only Romanian member of Oaklins, the world's most important alliance of professionals for companies' M&A.

During 2025, BT Capital Partners intermediated a series of bond issuances on External Markets and on the Main Market of the Bucharest Stock Exchange, namely:

Issuance of MREL-eligible bonds by Banca Transilvania SA, amounting to RON 1.5bn, with a 7NC6-year maturity, under the sustainable EMTN programme. The transaction was completed in June 2025, with BTCP acting as Joint Lead Manager. The bonds are listed on the Dublin Stock Exchange.

Inaugural green bond issuance by Societatea Energetică Electrica SA, totalling EUR 500 million, with a 5-year maturity. The issuance took place in July 2025, and BTCP acted as Joint Bookrunner. The bonds are listed on the Bucharest Stock Exchange.

Bond issuance by SNGN Romgaz SA, totalling EUR 500 million, with a 6-year maturity, executed under the company's EUR 1.5 billion EMTN programme. The transaction was carried out in October 2025, with BTCP serving as Joint Bookrunner. The bonds are listed on the Bucharest Stock Exchange.

Bond issuance by Agroserv Măriuța SA, amounting to EUR 3 million, with a 3-year maturity. The issuance was completed in November 2025, with BTCP acting as Sole Manager. The bonds are listed on the Bucharest Stock Exchange.

Inaugural AT1 bond issuance by Banca Transilvania SA, amounting to EUR 500 million, with a PNC5.5 maturity, executed in November 2025, with BTCP acting as Joint Bookrunner.

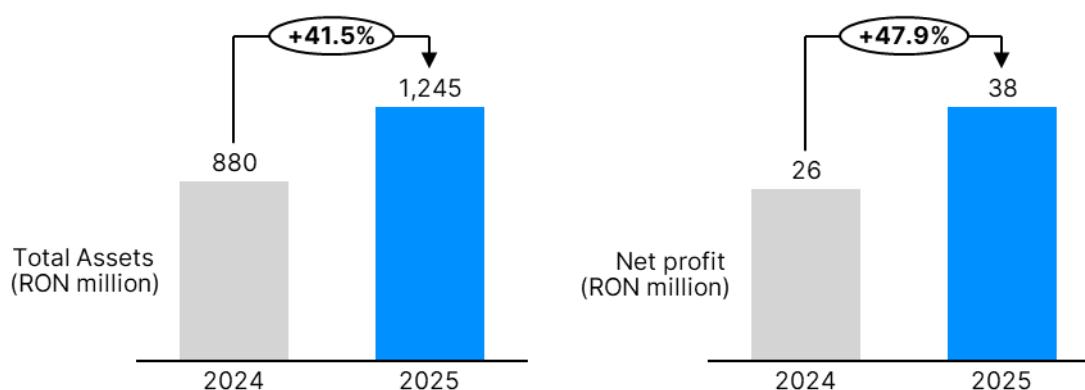
BT Capital Partners also intermediated all 11 Fidelis government bond issuances of 2025, which raised over RON 21 billion (in local currency and EUR) acting as the leader of the consortium comprising BCR, BRD - Groupe Société Générale, TradeVille, and UniCredit.

Also, in 2025, BT Capital Partners acted as the exclusive M&A adviser to travel agency Paralela 45 in attracting the strategic investor Rainbow Tours, one of the largest travel agencies in Poland.

In 2025, BT Capital Partners was, for the second consecutive year, the largest broker on the Bucharest Stock Exchange in terms of total value of intermediated transactions, holding a market share of 28% across all markets and instruments. The company was also, for the third year in a row, the leading intermediary on the main segment of the bond market, with a market share of 35%, and the second-largest intermediary on the equity market, with an approximate market share of 19%.

BT Capital Partners has been in the market since 2016, when BT Securities, the brokerage company of the BT Financial Group, took over the investment banking activity of Capital Partners, the most important Romanian independent consulting firm in the field of M&A and Corporate Finance.

- BT Capital Partners has 66 active employees (2024: 59 employees) and 9 working points as of December 31, 2025, in addition to its headquarters.
- Total assets as of December 31, 2025 amounts to RON 1,245 million (RON 880 million as of December 31, 2024), while the net profit stands at RON 37.8 million.



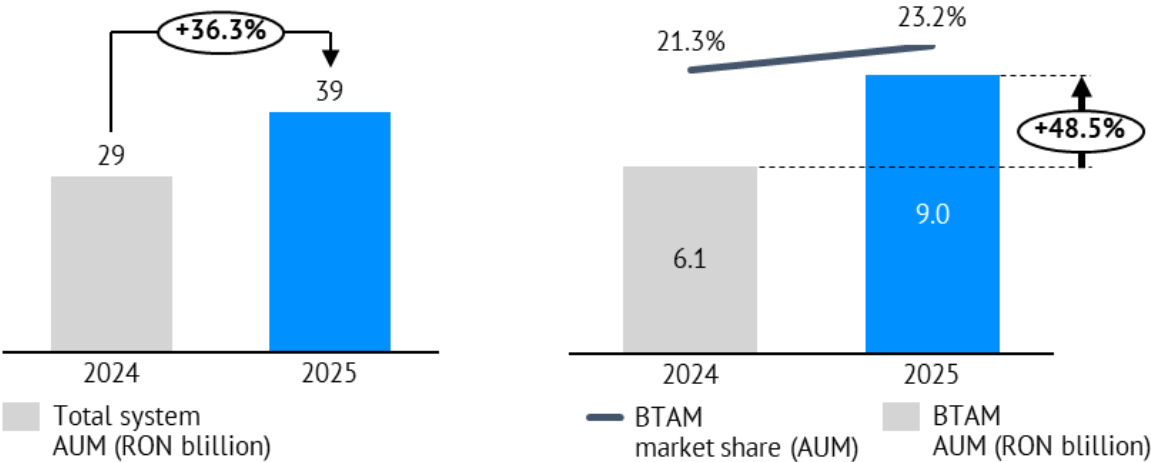
- Headquarters: Cluj-Napoca, 77 St.. 21 Decembrie 1989, The Office Building, Wings C-D, Entrance C, 2nd Floor.

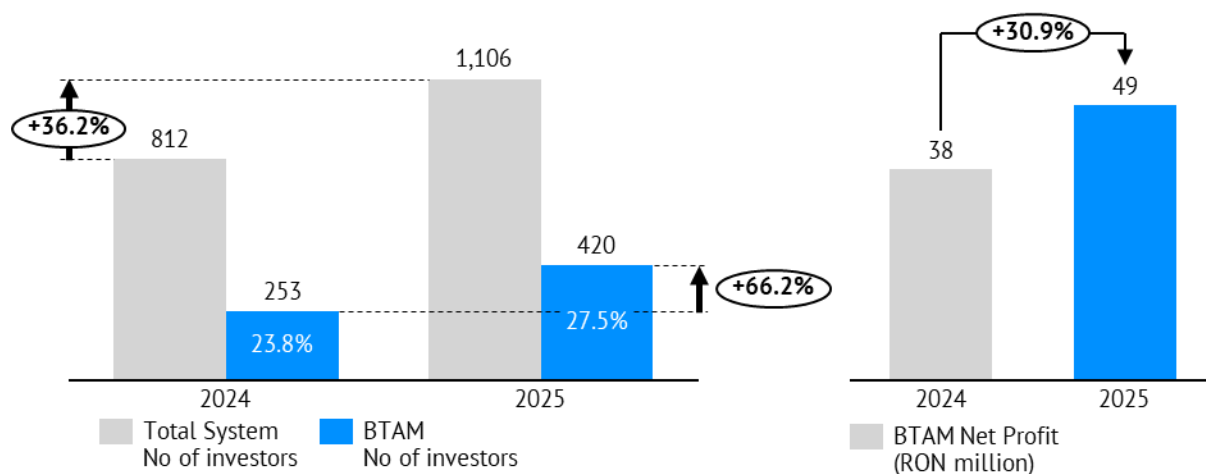
BT Asset Management S.A.I. S.A.

BT Asset Management (BTAM) manages undertakings for collective investment in transferable securities (UCITS) and alternative investment funds (AIFs). The funds offer a diversified range of investment products – fixed-income funds, bond funds, index funds, and equity funds. During 2025, the management right of the BT Property Fund was transferred to **INNO Investments**. Access to the capital market is provided to Fund participants through investments both in Romania and abroad (Europe and the USA), using placements in RON, EUR, USD and GBP.

At the end of 2025, the company managed 16 investment funds, consisting of 14 undertakings for collective investment in transferable securities (UCITS) and 2 alternative investment funds (AIFs) (2024: 17 investment funds, consisting of 14 UCITS and 3 AIFs).

In 2025, BT Asset Management continued to play a central role in the Romanian investment fund ecosystem, acting as a key driver of market development through its diversified fund offering and disciplined management framework. The system experienced robust growth in assets under management, reflecting rising investor confidence and an ongoing shift toward professionally managed investment solutions:





Source: Romanian Fund Managers Association

- Number of active employees as at 31.12.2025: 47 (42 as at 31.12.2024)
- Year of establishment: 2005
- Headquarters: Cluj-Napoca, Emil Racoviță Street, no. 22, 1st floor

INNO Investments S.A.I. SA

INNO Investments (INNO) manages undertakings for Collective Investment in Transferable Securities (UCITS) and Alternative Investment Funds (AIFs). The funds offer a diversified range of investment products – fixed income funds, bond funds, equity funds and a real estate fund. Access to the capital market is ensured to clients through investments in Romania, Europe and the USA, in RON, EUR and USD.

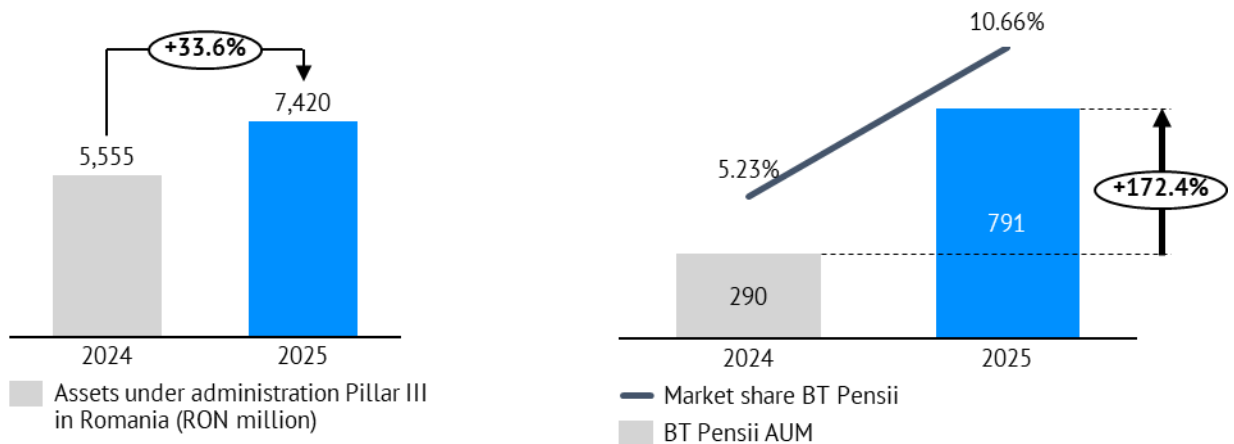
- At the end of 2025, the company was fully integrated into the Banca Transilvania Financial Group and the distribution of the funds managed by Inno was taken over within the BT network starting with 03.03.2025;
- Since 08.10.2025, the management of BT Property Alternative Investment Fund was taken over, with the aim of further developing the fund;
- During 2025 assets under management increased by 2%, reaching RON 598 million;
- Headquarters: Sos. Bucharest Ploiești, nr. 43, 2nd floor, sector 1, Bucharest, Romania.

The year 2025 was a transitional year for Inno, the company assuming a new identity, as well as a new strategic direction, that of and Alternative Investment Fund Manager, AIFM, for which it also received the ASF authorization on 18.07.2025. With the takeover of BT Property, Inno plans to expand the range of products offered to clients by including other alternative investment funds, aligned with the Group's strategic direction and to facilitate the access of capital to Romanian entrepreneurs.

BT Pensii

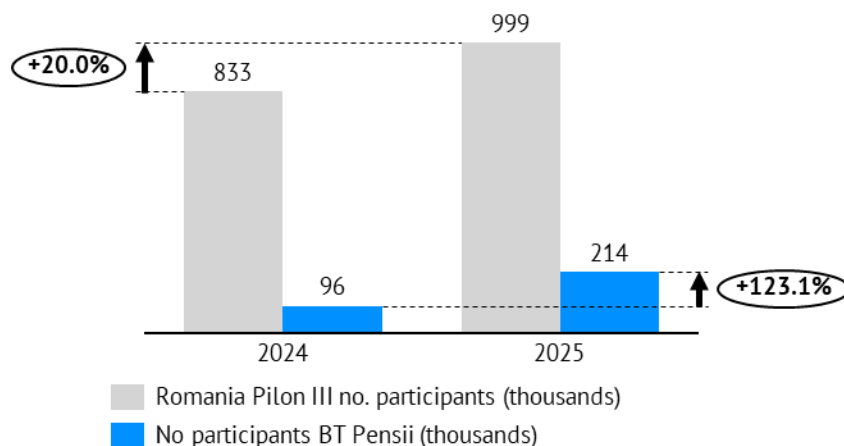
BT Pensii (BTP) manages the voluntary pension funds *Pensia Mea* and *Pensia Mea Plus*. BT expanded its financial services in the field of private pensions through the acquisition of Certinvest Pensii in 2019, and Certinvest Pensii became BT Pensii in June 2020. In 2025, BT Pensii took also the administration of the voluntary pension fund *Pensia Mea Plus*, from BRD Pensii.

- It is the only Romanian company managing voluntary pensions.
- Banca Transilvania's clients have the opportunity to contribute to voluntary pension funds *Pensia Mea* and *Pensia Mea Plus* funds through Banca Transilvania branches and agencies, and from 2025 through BT Pay
- At the end of 2025, the number of participants in the *Pensia Mea* fund increased to 173,238, an increase of 80.8% compared to the previous year. Assets under management reached RON 483 million, with a growth of 66.1% in 2025.
- In a continuously expanding market, BT Pensii reached, at the end of 2025, a total number of 213,801 participants across its two administered voluntary pension funds, and the value of the assets under management is RON 791 million.



Source: Financial Supervisory Authority

- The increase of more than 77,000 participants within a single year is a premiere in the voluntary pensions market, unmatched by any other voluntary pension fund throughout the market's history of over 18 years.



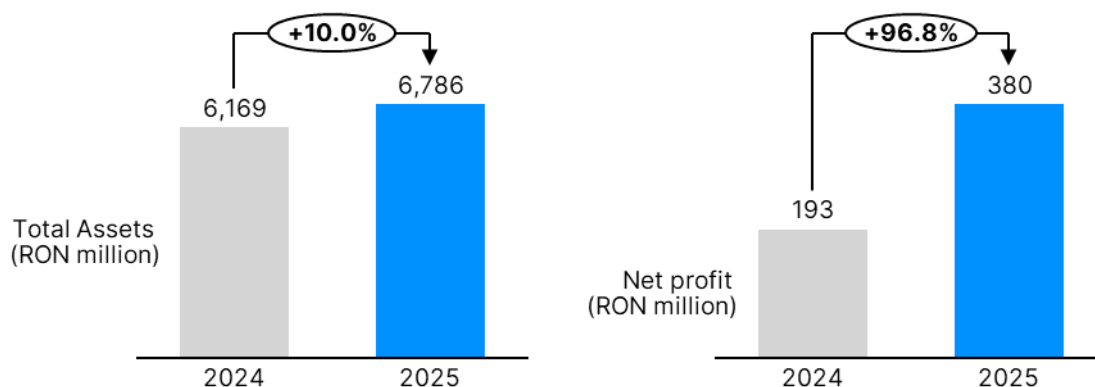
Source: Financial Supervisory Authority

- In 2025, 1 of 2 people who decided to save for their future pension through a voluntary pension fund chose *Pensia Mea or/and Pensia Mea Plus* fund.
- The value of monthly contributions to the administrated funds reached RON 17 million in December 2025, compared to RON 9 million in December 2024.
- Headquarters: București, 75-77 Buzești Street, 5th floor.

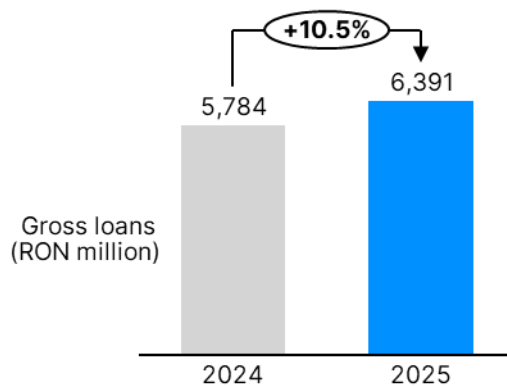
BT Leasing Transilvania IFN S.A.

BT Leasing offers in leasing a wide range of vehicles, production equipment and other type of equipment.

- Number of active employees as at 31.12.2025: 341 (326 as at 31.12.2024)
- Number of active clients: 46,800 (31.12.2025), up by 16% compared to previous year
- Total assets as of 31.12.2025 amounts to RON 6,786 million and net profit to RON 380 million
- BT Leasing is one of the leading players in the Romanian leasing market, with a market share of 25.5% in 2025, up from 21.8% in 2024.



- Gross loan portfolio reached RON 6,391 million, increasing by 10.5% compared to the previous year.



- Year of establishment: 1995.
- Headquarters: Cluj-Napoca, 77 21 Decembrie 1989 Boulevard, The Office Building, Blocks C–D, 2nd Floor and Ground Floor

BT Broker de Asigurare

BT Broker de Asigurare provides insurance brokerage and advisory services, offering clients integrated financial protection solutions tailored to both individuals and companies.

An essential role in BT Broker's insurance distribution is supported by its partnership with BT Leasing. This integrated model enhances distribution efficiency and delivers a comprehensive customer experience through complementary services and relevant solutions throughout the entire duration of the leasing contract.

BT Broker is the market leader in CASCO distribution, a position that confirms its expertise and operational capabilities in products associated with the automotive industry and leasing financing.

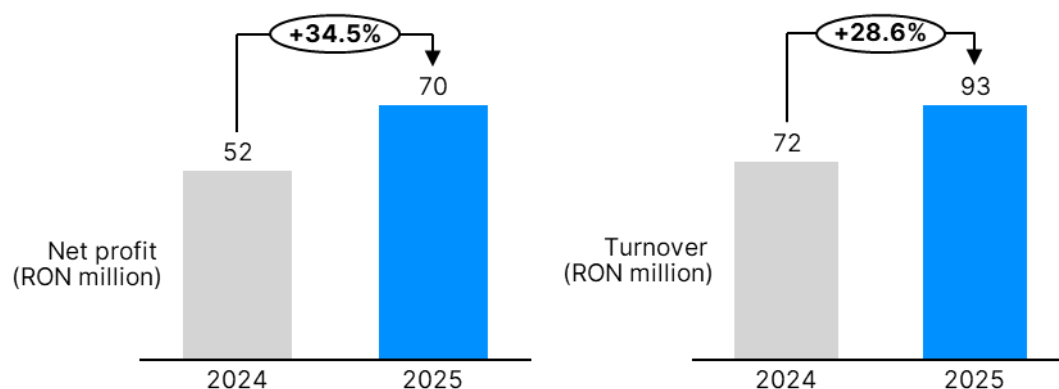
BT Broker continues to invest in the professional development and expansion of its team to support the growth in operational volumes and ensure high-quality customer interactions.

- Number of active employees as at 31.12.2025: 45 (41 as at 31.12.2024)

The positive trend in staffing reflects both the expansion of operational activities and the need to efficiently cover sales and support channels. The sustained growth of the team

contributes to maintaining quality standards and strengthening organizational capacity in the context of business expansion.

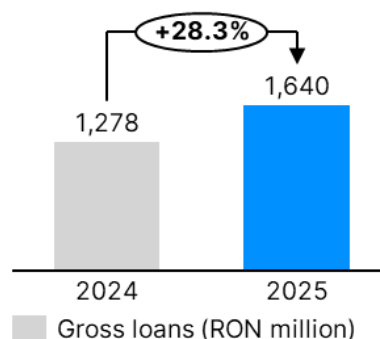
Net profit and turnover recorded significant increases in 2025, reflecting improved operational efficiency and growth in business volumes.



BT Microfinanțare IFN S.A.

BT Microfinanțare (BT Mic) is a non-banking financial institution dedicated to financing small businesses, including start-ups, which complements the role of Banca Transilvania in supporting the Romanian entrepreneurs. It addresses those entrepreneurs with a turnover of up to RON 1 million, regardless of the field of activity and legal form.

BT Microfinanțare is the largest microfinance company in Romania, with a market share of approximately 52% of the microfinance market by assets. In 2025, the growth of assets, respectively loans portfolio was 28%.



The company works with over 26,000 small businesses in 4,000 municipalities, to support and develop the daily activity, purchase of goods, payment of suppliers, investments in work points and/or opening new ones, the purchase of machines/equipment, etc.

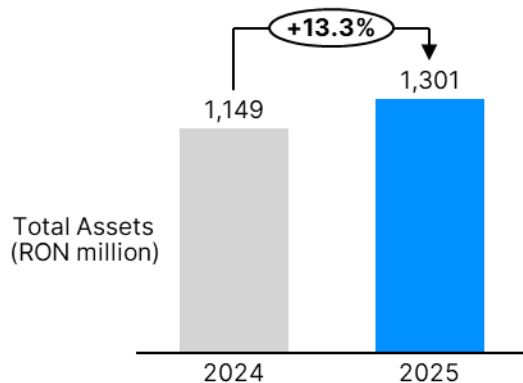
- In 2025, over 11,000 micro-companies received financing from BT Microfinanțare IFN S.A.
- Diversification of financing: the company supports over 420 types of activities
- Number of active employees as at 31.12.2025: 372 (308 as at 31.12.2024)

- BT Microfinanțare was founded in 2016
- Headquarters: Bucharest, 206 Calea Șerban Vodă

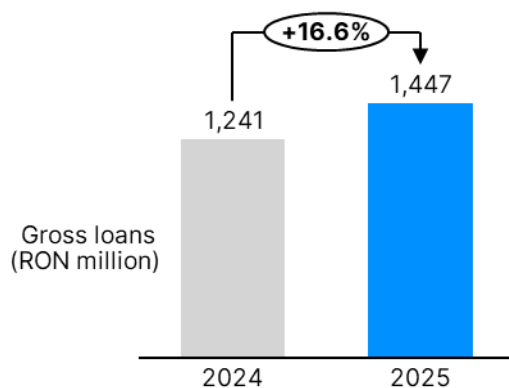
BT Direct IFN S.A.

BT Direct is a company designed to provide consumer loans to individual customers.

- BT Direct has 269.165 customers, 230.624 credit cards and 11.6% market share (30.09.2025).
- On April 28, 2011, the company obtained, from the NBR, the Payment Institution authorization, Series IP, no. 004, in accordance with the stipulations of Emergency Ordinance no. 113/2009, regarding payment services ("GEO 113/2009") and BNR Regulation 21/2009, in order to lend to credit cards individuals.
- BT Direct and ERB Retail Services IFN S.A. merged by absorption on August 1, 2019, and the name BT Direct IFN S.A. has been preserved. ERB Retail Services was acquired by Banca Transilvania from Eurobank Group in 2018, together with Bancpost and ERB Leasing.
- Number of active employees as at 31.12.2025: 217 (205 as at 31.12.2024)
- Total assets at 31.12.2025 reached RON 1,301 million (RON 1,149 million at 31.12.2024) and the net profit is RON 48,8 million.



- Gross loan portfolio reached RON 1,447 million as of December 31, 2025 (RON 1,241 million as of December 31, 2024).



- Throughout 2025, the company expanded and consolidated its presence in the medical services sector by providing financing solutions tailored to the needs of patients in partner clinics and hospitals.
- Headquarters: Cluj-Napoca, 21 Decembrie 1989 Boulevard, No. 77, The Office, Building C-D, ground floor.

Improvement Credit Collection S.R.L.

Improvement Credit Collection ("ICC"), established in 2013, carries out debt recovery activities, both through judicial and extrajudicial procedures.

Starting January 1st, 2026, the company operates through the following locations:

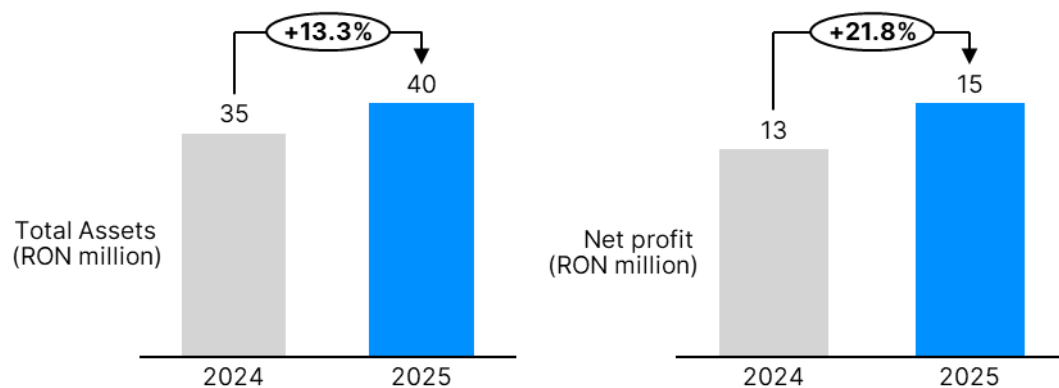
- Headquarters: Cluj-Napoca, 21 Decembrie 1989 Boulevard, no. 77, The Office, Building C D, ground floor;
- Secondary office (work point): Bucharest, Gara Herăstrău Street no. 4, Green Court A Building, 11th floor, Sector 2.

ICC provides integrated debt recovery services, both for its own portfolios and for its clients, covering the full range of industry specific activities, in compliance with current legislation:

- Recovery of receivables from individuals and legal entities through:
 - Amicable phase debt collection,
 - Legal phase debt collection,
- Efficient management of debt portfolios.

The company operates in full compliance with regulatory standards, operational efficiency principles, and industry best practices.

For 2025, ICC recorded the following results:



Throughout 2025, ICC played an active role in projects carried out at Group level, contributing significantly to:

- The acquisition and management of non-performing loan portfolios of debtors and clients of OTP Bank S.A.,
- The optimization of operational processes through interdepartmental coordination and the implementation of common working standards.

This involvement further strengthened ICC's position within the Group and supported the efficiency of debt recovery processes at national level.

According to data provided by [TOP 100 Companii România | Informații financiare companii | top100companii.ro](#), within its specific activity segment ICC achieved:

- A benchmark score higher than 71.63% of companies in the industry;
- A rating equivalent to Score Class A – High Score.

Additionally, according to the same study, based on official financial reports submitted to the Ministry of Finance for 2024, ICC ranks in the Top 10 companies in Romania under CAEN code 8291 – Activities of collection agencies and credit reporting bureaus, occupying:

- **2nd place** in profitability, with a profitability level 1,200% above market average (EUR 211,000);
- **8th place** in turnover, with EUR 5.4 million, representing 312% above market average (EUR 1.7 million);
- **2nd place** in operational efficiency and productivity, with EUR 36,000 profit/employee, 440% above market average (EUR 8,000);

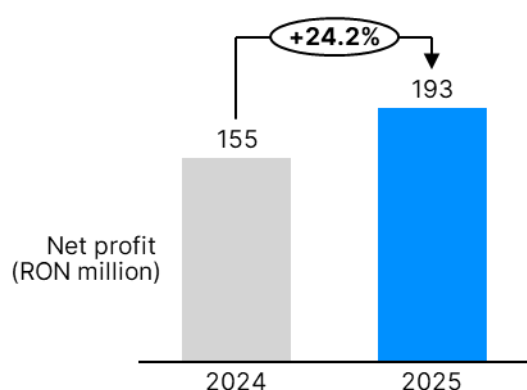
- **2nd place** in the Cost to Income indicator, with 50%, a level 36 percentage points better than the market average (86%).

REPUBLIC OF MOLDOVA

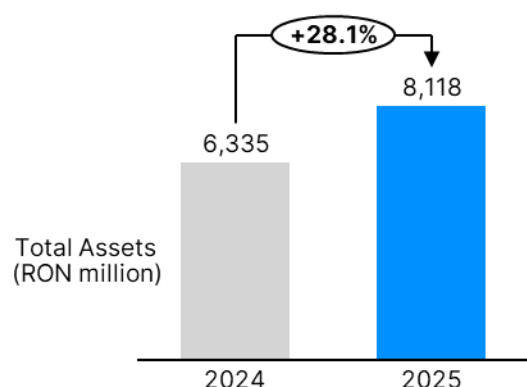
B.C. Victoriabank S.A.

Victoriabank is the third-largest bank in the Republic of Moldova. Since 2018, the bank has benefited from being part of Banca Transilvania Group, providing its clients with financial advantages resulting from group synergies and contributing to financial integration.

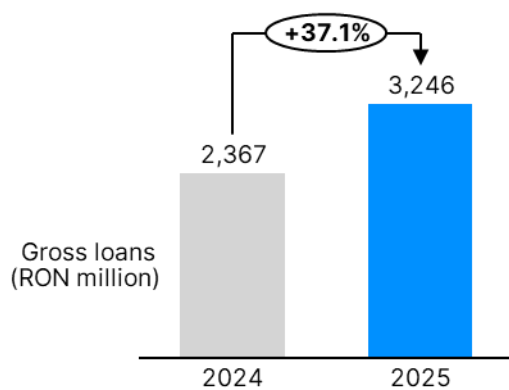
- Net profit as of 31 December 2025 amounted to RON 193 million, up by 24.2% compared to 2024.



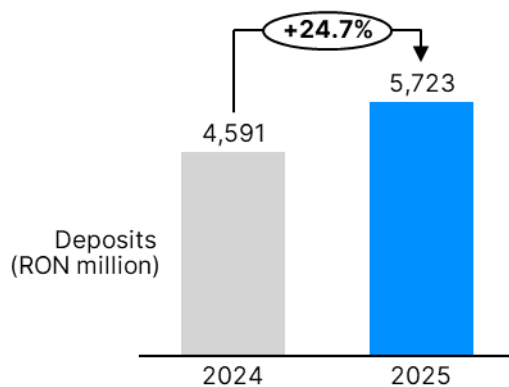
- Over 364,000 active clients work with Victoriabank, and the team counts more than 1,200 employees as of 31 December 2025
- Total assets as of 31 December 2025 amounted to RON 8,118 million



- Gross loan portfolio granted to clients reached RON 3,246 million, increasing by 37.1% over the year



- The deposit portfolio from clients amounted to RON 5,723 million, up by 24.7% compared to the end of 2024.



- For the second consecutive year, Victoriabank paid dividends, amounting to over RON 75 million in 2025.
- The total own funds stand at 29.43%, above the banking sector average and the highest among the top four banks.
- In March 2025, Victoriabank completed the merger with BCR Chişinău — an important step in strengthening its market position and a first on the banking market in the Republic of Moldova.
- In October 2025, the acquisition of Microinvest, the leading non-banking lending organization (NCO) in the Republic of Moldova, was finalized.
- The bank has 67 branches in 24 localities in the Republic of Moldova;
- Victoriabank is listed on the Moldova Stock Exchange and is the first commercial bank in the Republic of Moldova;
- Year of establishment: 1989;
- Headquarters: Chişinău, 141, 31 August 1989 Street.

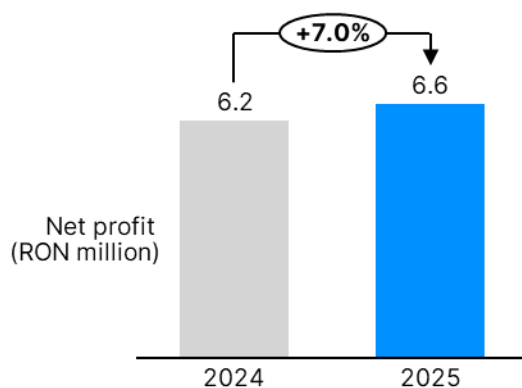
BT Leasing MD S.R.L.

BT Leasing MD is the first company established by Banca Transilvania Financial Group in the Republic of Moldova. Founded in 2008, BT Leasing MD is the market leader, ranking first for the past 9 consecutive years, with a market share of approximately 35%.

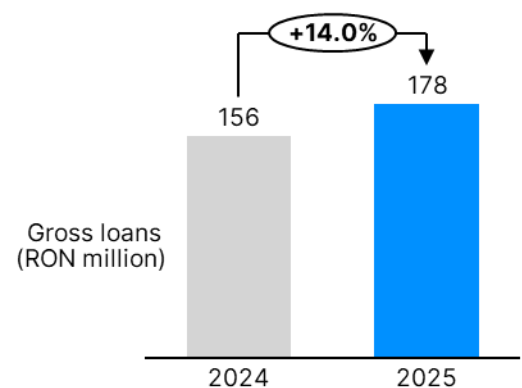
The company offers advantageous financing solutions both for individuals and for commercial companies in the Republic of Moldova.

In partnership with Victoriabank, a member of the Banca Transilvania Financial Group, it promotes the entrepreneurial spirit and supports entrepreneurs, who represent approximately 70% of the company's portfolio.

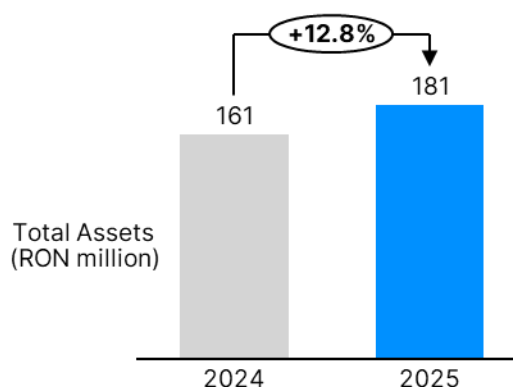
- Net Profit: RON 6.6 million in 2025 (RON 6.2 million in 2024)



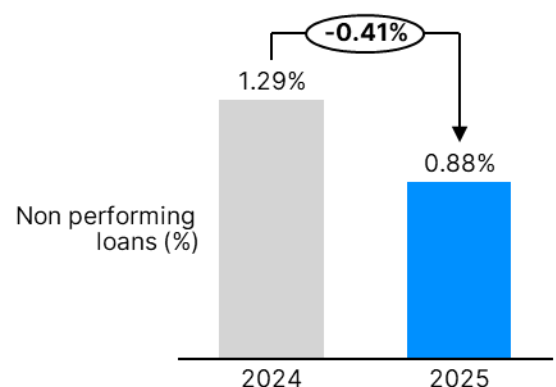
- Gross leasing portfolio: RON 178.1 million (RON 156.2 million in 2024)



- Total assets: RON 181.4 million in 2025 (RON 160.8 million in 2024)



- Non-performing loans as at 31.12.2025: 0.88% (2024: 1.29%)



- Active clients as at 31.12.2025: 1,479
- Active contracts as at 31.12.2025: 2,069

- Financing options: MDL and EUR
- 89.25% of the balance of active leasing transactions are without outstanding payments (31.12.2025)
- Year of establishment: 2008
- Number of active employees as at 31.12.2025: 42 (44 as at 31.12.2024)
- Headquarters: 60/2 Pushkin Street, Chişinău, Republic of Moldova

O.C.N. Microinvest S.R.L.

Microinvest is a non-bank financial institution operating in the Republic of Moldova. With over 22 years of experience, the Company plays a significant role in the local financial market, providing tailored lending solutions to businesses, farmers, and individuals, and thereby contributing to economic and social development. By focusing on SME financing and maintaining a high-quality portfolio, Microinvest supports the development of a more resilient and inclusive financial system in the Republic of Moldova.

In a competitive market environment, Microinvest distinguishes itself as a responsible, prudent, and transparent lender. Over the years, the Company has consolidated its position as a market leader and a trusted brand in Moldova's financial sector. As of the end of Q3 2025, Microinvest held a 40.3% market share among non-bank financial institutions and ranked fifth among the largest financial institutions in the country (including commercial banks and NBCOs) by portfolio size, with a 6.0% share of the total market.

As of the end of 2025, Microinvest reported a loan portfolio of RON 1.9 billion, underscoring its strong market position and capacity to generate meaningful economic impact. Approximately 58% of the portfolio is allocated to business clients, of which 36% supports the agricultural sector. Microinvest serves over 49,500 active clients – legal entities, entrepreneurs and individuals – through a team of 363 employees, including its subsidiary - Microinvest Technology S.R.L., and a network of 17 branches across the country. Microinvest collaborates with 20 international reputable funding partners, including FMO, PROPARCO, EBRD, EFSE, GGF, among others.

Microinvest is the only financial institution in the Republic of Moldova holding the GOLD international certification for client protection, reflecting its commitment to transparency and responsible finance. At the same time, the Company is strengthening its capabilities in financial technology by expanding digital lending services, with over 25% of its active client base currently using digital channels.

AWARDS AND RECOGNITIONS – VALIDATING A HIGHLY DYNAMIC YEAR

Awards and recognition	From	Details
Banca Transilvania		
Moody's upgraded BT's long-term deposit ratings to "Baa1" and its short- and long-term issuer ratings	Moody's	Moody's Ratings has upgraded Banca Transilvania's issuer and deposit ratings
Fitch Ratings affirms Banca Transilvania's long-term issuer rating at "BBB-" and its viability rating at "bbb-"	Fitch Ratings	Fitch affirms Banca Transilvania's ratings
- TLV: The most traded stock on the BSE regulated market in 2025 - Issuer with the highest liquidity growth in 2025	Bucharest Stock Exchange Bucharest	Next to come
Banca Transilvania brand is the third most valuable brand in Romania, reaching EUR 856 million	Brand Finance	The value of the Banca Transilvania brand has increased by 34%
Top of the most valuable companies in Romania	Ziarul Financiar	ZF Gala 27 years. Ziarul Financiar awarded the most valuable companies in Romania. The top 10 companies in the economy have a cumulative value of over EUR 62.9 billion, +14% compared to last year
Maximum VEKTOR rating for BT's communication with investors and shareholders for the seventh consecutive year	Romanian Investor Relations Association (ARIR)	BT obtains the maximum rating for its communication with investors in 2025, both as a stock and bond issuer

• Best Investor Relations Program • Best CEO: Ömer Tetik • Best Chief Financial Officer: George Călinescu • Best Investor Relations Representatives: Aurel Bernat (Executive Director of Financial Institutions and Investor Relations, BT) • Best Investor Relations Professionals • Aurel Bernat (Executive Director of Financial Institutions and Investor Relations, BT) • Diana Mazurchievici (ESG Integration & Investor Relations Director, BT) • Best Performance in ESG & Communication • Best Investor Relations Platform: Investor Relations • Best Investor Relations Event: Investor Day • Best Annual Report: Board of Directors Report		
	Romanian Investor Relations Association (ARIR)	Banca Transilvania, awarded for the activity in investor relations
Excellence Award for Outstanding Strategic Growth	Financial Intelligence	Financial Intelligence: Hall of Fame Awards Gala
BrandRO Heritage Award	Biz Magazine	The BrandRO 2025 Gala awarded the strongest Romanian brands
Bank of the Year	Financial Market	The 30th edition of the Financial Market Awards Gala, at the Mitiță Constantinescu Hall, the National Bank of Romania
Award for the best return on assets and equity (ROA and ROE)	FINMEDIA and Financial Market	Top Bankers 2025 Awards Gala
Third highest score for the 2025 Sustainability Report	The Azores Sustainability & CSR Services & Allies for Sustainability	

Outstanding Women's Network of the Year	Romanian Diversity Chamber of Commerce	How Romania's First Diversity Awards Are Rewriting the Rules of Business Success
Recognition for ESG risk mitigation (Rating 14.9)	Sustainalytics	BT has the best ESG Risk Rating in the last three years
Gold Recognition		
- Category: Mentoring, Leadership & Non-Formal Education - Dar Scholarships Project - Hope and Homes for Children - Category: Education for students - What's Next Project – Salvați Copiii Romania	Community Index	Community Index: Investing in People & Planet
BT Asset Management		
Best performing local investment fund: BT Technology	Bucharest Stock Exchange Bucharest	Next to come
- Award for the best performing foreign equity fund: BT Index Austria – ATX - Award for the fund with the highest number of investors: BT Fix - Award for Best Young Fund Manager: Alexandru Tudor	Romanian Fund Managers Association (AAF)	Investment Funds Market in October 2025
Company of the Year Romania 2025	Global Banking & Finance Awards	Global Banking & Finance Awards
Best investment fund: BT Clasic	Financial Market	Financial Market Awards Gala, 30th edition at Mitiță Constantinescu Hall, National Bank of Romania

BT Broker

- Award for Performance in Vehicles Insurance Brokerage
- Award for Performance and Dynamism

Xprimm Media

2025 Insurance Brokers Awards

BT Capital Partners

Most Active Intermediary in the Bonds Segment

Bucharest Stock Exchange
Bucharest

Next to come

- Best securities brokerage company in Romania 2025
- Best research company in Romania 2025
- Best Trading Platform in Romania 2025

Global Banking & Finance Awards

Global Banking & Finance Awards

Best Broker in the Capital Market

Financial Market

Financial Market Awards Gala, 30th edition: Mitiță Constantinescu Hall, the National Bank of Romania

BT Leasing

Company of the Year in Financial Leasing

FINMEDIA and the Financial Market

Romanian Leasing Gala 2025

Improvement Credit Collection

First place in the National Top in the Medium-Sized Enterprises section in "Services" in the CAEN code group

Romanian Chamber of Commerce and Industry

National Top Companies Gala

INNO Investments

Most Innovative Fund: OTP Innovation

Romanian Fund Managers Association (AAF)

Investment Funds Market in October 2025

Consistent performance in real estate: BT Property

Bucharest Real Estate Club (BREC)

Brec Awards 2025: Special Award & Strategic Investments Award

Victoriabank

Top Employer 2025, for the fifth consecutive year

Axa Management Consulting

Victoriabank, named Top Employer in 2025 for the fifth consecutive year



MANAGEMENT REPORT. FINANCIAL & OPERATIONAL PERFORMANCE, EXECUTION, DIRECTION

- BT strategy in 2025 – execution, results, impact
- Financial position of Banca Transilvania and BT Financial Group
- Bond programmes launched in 2025
- Profit and loss account – yearly dynamics
- Prudential indicators – stability and financial discipline
- Performance of the bank's business lines – growth across all verticals
- 2026 outlook – strategic directions and financial perspective

Both the Group and Banca Transilvania remain committed to supporting their customers and to being a reliable partner in fostering economic growth, in line with their role as a multinational entity and as Romania's leading bank. The year 2025 was marked by numerous challenges, characterized both by acquisitions and integration processes, as well as by strong organic growth. The separate and consolidated financial statements are prepared in accordance with the International Financial Reporting Standards adopted by the European Union (NBR Order no. 27/2010, as subsequently amended and supplemented).

BT STRATEGY IN 2025 – EXECUTION, RESULTS, IMPACT

STRATEGY ACHIEVEMENT IN 2025

Our goals for 2025 included the following qualitative objectives:

- Maintaining our position as the largest lender in Romania through organic growth and maintaining our interest in acquisitions or mergers with entities that can bring further growth opportunities. 2025 will have as priority integration of OTP customers within the BT Group, with focus on smooth transition and high-quality client service.
- Supporting lending and the development of the Romanian economy in the coming period, with focus on sectors that are of strategic importance at national level, such as infrastructure, healthcare, agriculture, education, energy or areas that are addressed by local and European strategic priorities. BT continues to sustain the growth of business of all sizes, from entrepreneurs to Large Corporates. At the same time, BT will remain a reliable partner for national and European programs and will sustain companies and projects that can drive an accelerated absorption of European funds.
- Consolidating the position of top player in all business segments: leasing, asset management, financial intermediation, etc. and increasing synergies between group companies to offer our customers improved client experience and a fully equipped financial ecosystem.
- Continue our ESG initiatives to contribute to a sustainable development of the Romanian economy.
- Digital: continue our focus on streamlining and automating operations and processes, both in BT and its subsidiaries, to the benefit of our customers, through constant investments in technology and IT infrastructure. Offering secure, resilient and reliable platforms and fast adaptation to local needs and wants of our customers are among our top priorities in terms of operating model.
- Sustain the consolidation of the first 100% digital bank in Romania to implement new features, offer a wider range of products and ensure a secure, yet accessible banking experience to Salt Bank customers.

Quantitative objectives

- Total assets: +13.9% growth, out of which BT's organic growth 8%
- Total gross loans: +19.3% growth
- Total deposits from customers: +13.4% growth, out of which BT's organic growth expected 6%
- Cost/Income ratio: 45.4%
- Loans/deposits: 60.8%

Qualitative objectives achieved

In 2025, Banca Transilvania maintained its leadership as Romania's largest lender through a combination of strong organic growth and a dynamic M&A agenda culminating in: the record-time merger with OTP Bank Romania completed in less than seven months from closing. This integration added ~130,000 new customers, while expanding BT's presence especially in Bucharest and central Romania. Throughout the year, BT delivered a smooth, high-quality transition for OTP clients – supported by bilingual services and a dedicated "Hungarian Desk" – so that service continuity and client experience remained front and center. The M&A activity included the successful merger of Victoriabank with BCR Chisinau in the same month with the OTP Bank merger, completing the transaction of BRD Pensii, both Pillar 3 and Pillar 2, and acquiring the largest non-banking financial institution in Moldova, Microinvest, through Victoriabank. These steps alongside sustained organic loan growth, reinforced BT's leadership in the Romanian banking system and its role as the main financier of the Romanian economy. In addition, despite being a high growth company with significant merger and acquisition activity and ongoing integrations over the last years, BT has remained focused on customer satisfaction: based on independent studies, Banca Transilvania ranks first in terms of customer satisfaction among large banks in Romania, with 12 points above the market average (NPS – Net Promoter Score) of 52 points. Customers appreciate the quality of products and services, the professionalism of the team, and the infrastructure that makes banking easier.

With reference to the lending activity, BT delivered above-market growth of 22.6% in terms of gross loans, particularly driven by new production higher than in 2024 and increase in the number of active customers across segments. Even excluding the OTP portfolio, the organic growth of the portfolio was +12.8% in case of retail loans (above the sector average growth of 8.3%) and +11.8% in case of loans granted to companies (above the sector average growth of 3.5%).

BT sustained the growth of businesses of all sizes – from population to entrepreneurs and SMEs to Large Corporates – through robust organic loan production (RON 21.1 billion in new loans to companies and RON 12.9 billion in retail lending). By acting as a partner in state-guaranteed programs like IMM Invest Plus and the dedicated Farmers' Loan, by continuing to back projects capable of accelerating EU funds absorption and by enhancing its broader capabilities in syndicated financing BT continued to support the strategic

investments across Romania's priority sectors. Specifically, in 2025 BT was the main bank in project and infrastructure financing and one of the leading banks in the syndicated loan market, actively participating in the most significant lending projects implemented in Romania. In healthcare, BT's market share in opened accounts consolidated to 45% (from 40% as of 31 December 2024), while reaching to 26% market share in agriculture (from 21% as of 31 December 2024). As of 31 December 2025, BT has ~70 thousands customers in these two critical sectors.

In 2025, Banca Transilvania consolidated its top-tier position across all major financial segments –leasing, asset management, and financial intermediation– while deepening synergies across the BT Group to deliver a cohesive, high-quality client experience and a fully equipped financial ecosystem.

- BT Leasing remains one of the most important players on the leasing market in Romania, increasing their net profit by 97% compared to 2024 and their total assets by 10% compared to prior year. Having one of the most active M&A profiles on the leasing market, BT Leasing has boosted scale and reach in equipment and vehicle financing.
- In 2025, BT Asset Management added significant depth to BT Group's investment and savings offering, increasing their assets under management by 48.5% and reaching more than 420,000 investors (+66% versus prior year).
- BT Group reinforced its brokerage and capital markets footprint via BT Capital Partners, which ended 2025 as #1 at the Bucharest Stock Exchange by trading volumes (28% market share).
- BT Mic holds the leading position in microfinance, with a market share of 52%.
- BT Direct posted 13% growth in total assets versus prior year.
- The subsidiaries in Moldova, taken together, are also making an increased contribution at the consolidated level both in terms of assets and profitability, consolidating their footprint across the full range of financial services.

These moves enabled BT to orchestrate cross-business journeys – from banking to leasing, pensions, asset management, e-commerce acquiring and beyond – so customers benefited from unified digital apps (BT Pay, BT Go), broader product choice, and seamless service across channels. The result is a stronger multi-segment market leadership and tighter Group synergies, all oriented toward elevating customer experience and making BT's financial ecosystem the most complete in Romania.

Banca Transilvania continued to advance ESG initiatives that support Romania's sustainable development – by scaling green finance, embedding responsible practices across the Group, and partnering on programs that accelerate the country's climate and social priorities.

- BT has further raised its green-lending target to companies to RON 6.5 billion for 2025–2028, after reaching RON 2.15 billion in green financing (+20% as compared

with prior year). The green loan production in 2025 was predominantly allocated to green building projects (RON 938 million), renewable energy (RON 859 million), and dedicated climate initiatives (RON 320 million), RON 130 million in energy efficiency projects, RON 33 million in blue finance projects and RON 13 million in clean transportation projects.

- In 2025 BT originated approximately 3,500 green mortgages, totaling RON 1.2 billion (+142% as compared to 2024), accounting for 8.48% of total mortgage production in 2025 (versus 5.27% in prior year). The outstanding green loan portfolio to retail segment amounts to RON 2.94 billion (+30% versus prior year).
- In 2025, BT Leasing financed the acquisition of more than 9,500 hybrid and electric vehicles Leasing, with total financing of approximately RON 1.9 billion, (+54% as compared with 2024). As of 31 December 2025, around two-thirds of BT Leasing's financed portfolio consists of hybrid or electric vehicles.
- During 2025, Banca Transilvania issued its third sustainable bond in a row, reaching a portfolio of EUR 1.5 billion of sustainable bonds, a premiere for the CEE region. The sustainable bond issuance activity continues to channel funding into renewable energy, green buildings, clean transport, healthcare, education, and MSME inclusion—helping to deliver measurable environmental and social outcomes while supporting Romania's long-term transition. BT published the second edition of its [Impact and Allocation Report](#) in June 2025.
- Over 380 community projects, run by over 350 partners, were supported by BT. The total investment in CSR projects amounted to RON 87 million.
- Through the BT Pay app our customers donated over RON 2 million to sustain different CSR causes
- Some of the most prominent projects in 2025 carried by Banca Transilvania were: "FIT – Finanțe pe înțelesul tuturor" (financial education), "Stai un pic înainte de click" (online security), "Via Transilvanica" (promoting Romanian tourism).
- BT continued to be a supporter of major cultural and sports events from Romania during 2025.
- BT's reporting under CSRD/ESRS standards strengthens Group's transparency and impact measurement.

These actions underpin strong ESG ratings provided by Sustainalytics, FTSE Russell, CDP, Refinitiv and CST index. Even more so, they portray BT's role as a catalyst for a more resilient, low-carbon economy serving people and businesses across Romania

For further details related to ESG developments and initiatives, please see the enclosed Sustainability Statement.

In 2025, Banca Transilvania sustained its digital-first operating model with continuous investments in technology and IT infrastructure to streamline and automate processes

across the bank and its subsidiaries, improving speed, reliability and security for customers. The year saw faster processing and scale:

- 4.9 million digitalized unique clients (+11% as compared with prior year), representing 98% of active clients.
- The number of cards in the portfolio reached 8.1 million (7 million as of 31 December 2024), and the number of card transactions increased by 19% in 2025 compared to 2024.
- The number of mobile payments increased significantly in 2025 (29% as compared with prior year), with every second card being NFC, while the number of electronic transfers increased three times in 2025 compared with 2024.
- A solid performance was recorded for acquiring terminal solutions that increased 2.6 times versus prior year, while the websites allowing Pay with BT Pay reached an impressive number of over 30 thousand, in the context of 98% of cards transactions being done for purchases.
- 80% of savings are exclusively digital.
- 78% of Chat BT interactions are fully AI based.
- The volume of transfers in BT Pay increased by 70% in 2025 compared to 2024.
- After integrating the investment funds managed by BT Asset Management in the mobile application, 90% of the new investments are made via BT Pay.
- More than 544 thousand customers (+260% versus prior year) are enrolled in BT GO ordering transactions and payments worth over RON 351 billion, out of which 57% are via the mobile version.
- ~ 159 thousand E-factura were issued in 2025, four times higher than in 2024.

While BT expanded access to resilient, feature-rich platforms such as BT Pay (retail), BT Go (corporate), and BT Visual Help (guided self-service), the focus was put on the customers' tailored experiences for local needs (e-factura, access to local index funds and Pillar 3 pension funds, management bill payments issued by local utilities providers, access to insurance, top-ups etc.). The strong customer satisfaction proved in recent independent NPS surveys is testament that enriching digital solutions meets the customers' demands. These digital capabilities underpin BT's ability to adapt quickly to market demands, keep platforms secure and reliable, and deliver consistent, high-quality service across its enlarged ecosystem.

In 2025, BT consolidated Romania's first 100% digital bank – Salt Bank. The neobank accelerated feature releases, broadened the product set, and kept the experience secure yet easy to use for its fast-growing customer base. Launched in April 2024 and built in the cloud on Engine by Starling, Salt surpassed 500,000 customers after its first year of operation and reached 700,000 by the end of 2025, while developing new features for its mobile app, with round-the-clock support and excellent uptime. The app added tools like Subscription Manager, PayBill, AutoSaver, multi-currency cards (17 currencies), investments, and fraud-prevention features, while sustaining a 24/7, human-led Care

Center to keep digital banking accessible and trusted. This scale-up has been recognized with multiple awards (including Celent's 2025 Model Bank and FinTech Breakthrough's 2025 Best Digital Bank), and BT's continued investment focus ensures Salt's platform remains secure, resilient, and ready to adapt quickly—with a clear roadmap to expand products further and reach 1 million+ customers.

Quantitative objectives

Ratio	Proposal	Achievements
Total assets	RON 209.9 billion, increasing by 13.9% vs. 2024	RON 210.4 billion, increasing by 14.2% vs. 2024
Net profit	RON 3,918 million	RON 4,095 million, higher by 16% vs. 2024
Deposits from customers	RON 170.9 billion, increasing by 13.4% vs. 2024	RON 168.9 billion, increasing by 12% vs. 2024
Loans to customers (gross)	RON 103.9 billion, increasing by 19.4% vs. 2024	RON 105.6 billion, increasing by 22.6% vs. 2024
Equity	RON 16.3 billion	RON 20.1 billion, an increase of 41.3% vs. 2024, attributable also to BT's first AT1 issuance of EUR 500 million
C/I Ratio	45.4%	44.4% (39.4% excluding the effect of turnover tax)
Loan / Deposit ratio	60.8%	62.6%
Investment budget	RON 843 million (VAT included)	RON 666 million (VAT included)

FINANCIAL POSITION OF BANCA TRANSILVANIA AND BT FINANCIAL GROUP

Banca Transilvania ended the year 2025 with total assets amounting to RON 224,414 million at consolidated level, up by 8.4% compared to 2024, and RON 210,398 million at bank level, up by 14.2%, slightly exceeding the individual budget by 0.2%.

Financial position at the end of 2025:

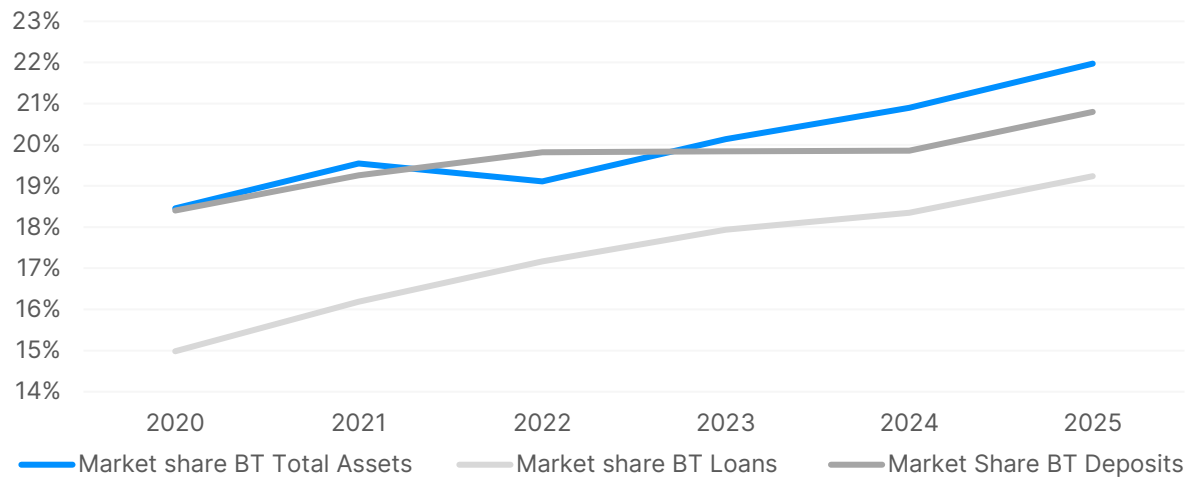
RON Million	BANK				GROUP		
	Realized 2025	Budget 2025	Realized 2024	Δ 2025/ 2024	Realized 2025	Realized 2024	Δ 2025/ 2024
	(1)	(2)	(3)	(4)=(1)/ (3)-1	(5)	(6)	(7)=(5)/ (6)-1
Cash and cash equivalents with the Central Bank	23,224	17,598	16,908	37.4%	25,499	21,950	16.2%
Placements with banks and public institutions	14,476	14,238	13,612	6.3%	16,552	13,715	20.7%
Loans and advances to customers	105,631	103,880	86,182	22.6%	113,344	101,976	11.1%
Provisions for loans and advances to customers	(5,940)	(5,883)	(4,792)	24.0%	(6,634)	(5,606)	18.3%
Portfolio of debt instruments, equity instruments, and derivatives, net of provisions	66,541	74,246	64,717	2.8%	69,208	68,410	1.2%
Fixed assets	4,175	3,278	4,991	-16.4%	3,755	3,395	10.6%
- Tangible, intangible assets and assets related to the rights of use	2,801	2,346	2,346	19.4%	3,726	3,372	10.5%
- Shareholdings	1,373	932	2,645	-48.1%	29	23	23.8%
Other assets	2,291	2,579	2,645	-13.4%	2,690	3,195	-15.8%
Total assets	210,398	209,936	184,264	14.2%	224,414	207,035	8.4%
Equity	20,092	16,261	14,219	41.3%	23,298	17,437	33.6%
Subordinated loans	2,466	2,405	2,405	2.5%	2,643	2,531	4.5%
Deposits from customers	168,862	170,879	150,785	12.0%	175,250	167,869	4.4%
Deposits from banks	14,925	15,242	12,383	20.5%	17,425	13,189	32.1%
Other liabilities	4,053	5,149	4,471	-9.4%	5,798	6,010	-3.5%
Total Liabilities and Equity	210,398	209,936	184,264	14.2%	224,414	207,035	8.4%

*Due to rounding, the numbers presented in this document may not add up exactly to the total presented and the percentages may not accurately reflect absolute numbers.

The Bank’s market share in terms of assets is of 22% as at December 31, 2025.

Market share

31.12.2025

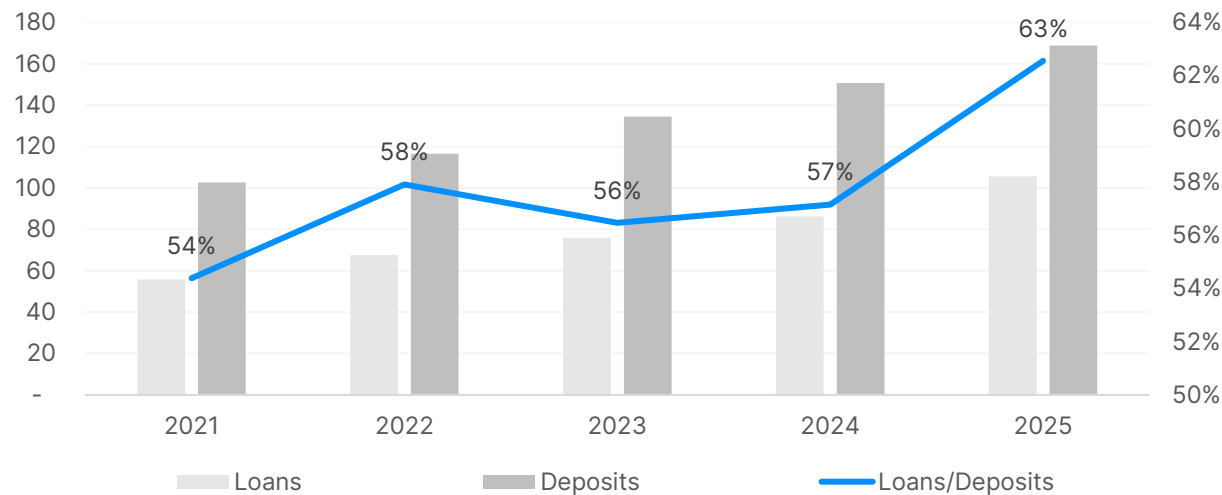


Gross loans/deposits ratio (31.12.2025)

The gross loans-to-deposits ratio stood at 64.7% at Group level, up by 3.9 percentage points compared to the end of 2024. At Bank level, the indicator increased to 62.6%, with 5.4 percentage points above the December 2024 level, development driven both by the acquired portfolios and by organic growth supported by strong loan demand.

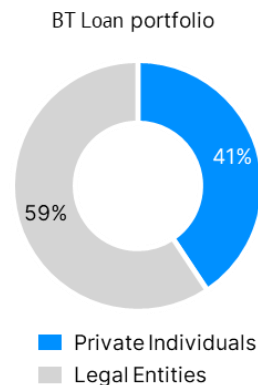
Gross loans/deposits

2021-2025



Loan portfolio (31.12.2025)

- The gross loan portfolio at Group level reached RON 113,344 million at the end of 2025, an increase of 11.1% compared to 2024. The Bank's gross loan portfolio was 22.6% higher than at the end of 2024, a growth supported both by the merger with OTP Bank and by the strong financing demand from companies and individuals. This performance was recorded despite the fact that, in 2025, loans amounting to approximately RON 167 million were written of from the balance sheet, a level similar to the previous year.



- The gross value of loans and leasing receivables at the time of the acquisition of O.C.N. Microinvest S.R.L. amounted to RON 1.84 billion.
- Increasing the quality of the loan portfolio as measured by the non-performing loan rate according to the EBA AQT_3.2. is at 2.40% at the end of 2025, slightly higher than the level of 2.07% recorded at the end of 2024, but below the level of 2.69% NPL rate of the Romanian banking system as communicated by the National Bank of Romania.

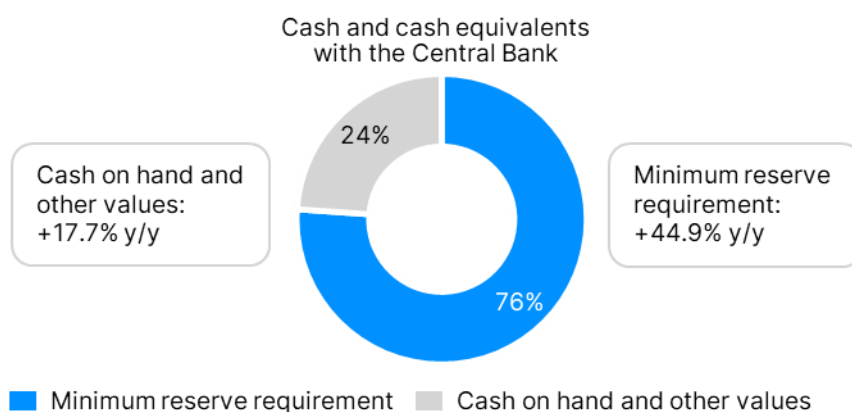
Expected credit loss balance (31.12.2025)

- The total balance of expected credit losses from lending activities at Group level amounted to RON 6,634 million, reflecting an 18.3% increase compared to 2024, while at Bank level provisions reached RON 5,940 million, marking a 24.0% rise versus 2024. The overall increase in provisions is attributable both to the significant expansion of the portfolio and to additional impairment adjustments for Stage 3 loans, which contributed 108 basis points to the growth. The Bank's coverage ratio of Stage 3 loans with provisions reached a comfortable level of 69.5% in 2025.

Cash and cash equivalents with the Central Bank (31.12.2025)

- Cash and balances with the Central Bank recorded a 16.2% increase at Group level compared to the end of 2024, reaching RON 25,499 million. At Bank level, the balance with the Central Bank amounted to RON 23,224 million, up by 37.4% versus 2024. The Bank's evolution is mainly attributable to the increase in the minimum

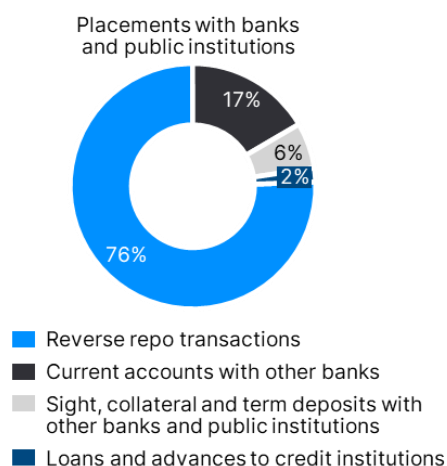
reserve requirement maintained with the National Bank of Romania, which accounts for approximately 76% of this category (RON 17,762 million).



- In 2025, the minimum reserve requirement rate at the National Bank of Romania was maintained at the same level as in 2024, namely 8% for RON-denominated customer deposits and 5% for EUR-denominated customer deposits.
- The Bank's immediate liquidity ratio stood at 50.18% at the end of 2025.

Placements with banks and public institutions (31.12.2025)

- At Group level, placements with banks increased by 20.7% compared to 2024, reaching RON 16,552 million, while at Bank level they grew by 6.3%, up to RON 14,476 million. The evolution at Bank level is mainly driven by the increase in reverse-repo transactions, whereas loans and advances granted to credit institutions recorded a decline. As of December 31, 2025, placements with banks include reverse-repo securities, term deposits, and loans and advances to credit institutions with maturities under three months, with the value of reverse-repo transactions amounting to RON 2,751 million at both Group and Bank level.



Securities (31.12.2025)

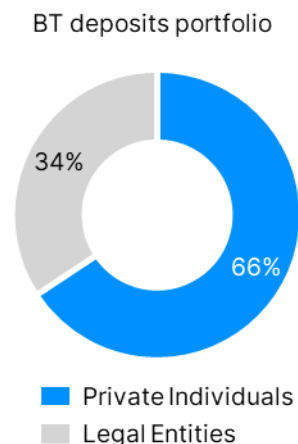
- The portfolio of securities and derivative instruments increased by 1.2% compared to the previous year, reaching RON 69,208 million at Group level, out of which the Bank recorded a 2.8% increase, up to RON 66,541 million. The largest share within this category is held by securities issued by central governments, which amounted to RON 60,632 million at Bank level, marking a 4.5% increase in 2025.

Fixed assets (31.12.2025)

- The Group's fixed assets increased by 10.6% compared to 2024, reaching RON 3,755 million, while at Bank level a decrease of 16.4% was recorded, down to RON 4,175 million. The reduction in investments in subsidiaries contributed significantly to this development, with such investments totaling RON 1,373 million at the end of 2025, compared to RON 2,645 million at the end of 2024.

Customer deposits (31.12.2025)

- Customer deposits increased by 4.4% at Group level compared to 2024, while at Bank level the advance was 12.0%, exceeding the 7.0% growth rate recorded in the banking system overall.
- The share of customers' current accounts in total deposits recorded a slight year-on-year decrease, from 49% in 2024 to 47% in 2025, while the share of term deposits increased from 51% to 53%.
- 66% of customer deposits originate from individuals, while 34% come from corporate clients.



Subordinated loans (31.12.2025)

- As at 31 December 2025, in the balance there were subordinated bonds issued by the Bank amounting to EUR 485 million, equivalent of RON 2,466 million, containing non-convertible bonds issued in 2018 and 2023.

As at 31.12.2025 the shareholders' equity of Banca Transilvania was in amount of RON 20.092.024.330, of which:

- The share capital registered with the Trade Register on December 31, 2025, represents **1,090,322,225** shares with a par value of 10 RON/share (on December 31, 2024 it consisted of **916,879,846** ordinary shares with a nominal value of RON 10 each). In the structure of the nominal capital, RON 86,501,040 were taken into account, representing the adjustment to inflation of the social capital and surplus from the revaluation of fixed assets, used for the capital increase, which was not achieved by the date of the transition to the International Financial Reporting Standards adopted by the European Union;
- Equity premiums: RON 28,613,972;
- Legal reserves: RON 1,493,546,486;
- Reserves for bank risks: RON 77,892,714;
- Reserves from change in fair value of financial assets measured at fair value through other items of comprehensive income, net of deferred tax: RON -703,027,745;
- Reserves from the revaluation of tangible and intangible assets, net of deferred tax: RON 31,510,999;
- Retained earnings (without current profit and profit distribution): RON 1,789,661,266;
- Own shares: RON 0;
- Additional equity instruments: RON 2,529,996,037;
- Profit: RON 4,095,289,537;
- 5% Legal reserve fund from gross profit: RON -241,182,226.

The share capital increase was made from the following sources: by incorporating the reserves established from the statutory profit of 2024 in the amount of RON 1,734,423,790 (2024: RON 1,182,216,130 from the incorporation of reserves established from statutory profit).

Following the Resolutions of the Extraordinary General Meeting of Shareholders of Banca Transilvania dated April 28, 2025, it was decided to increase the share capital by RON 1,734,423,790 through the issuance of 173,442,379 new shares, with a nominal value of RON 10 per share. The share capital increase was carried out by incorporating the reserves formed from the 2024 net profit, amounting to RON 1,734,423,790, through the issuance of 173,442,379 shares with a nominal value of RON 10 per share, for the benefit of the shareholders registered with the Central Depository. As a result, the new share capital amounts to RON 10,903,222,250, corresponding to 1,090,322,225 shares with a nominal value of RON 10 per share.

Banca Transilvania issued additional Tier 1 bonds (AT1 bonds) in November 2025, with a volume of EUR 500 million. AT1 bonds are unsecured and subordinated bonds, are perpetual, and can only be redeemed by the issuer on predetermined dates. AT1 bonds

include discretionary non-cumulative coupon payments, which allows them to be classified as equity under IFRS.

If the CET 1 of the Group or the Bank falls below 5.125% (i.e., if a trigger event occurs), the principal amount will be reduced. The issuer may, at its discretion, increase the amount (in whole or in part), subject to certain conditions, including the recording of a positive result and the remedy of the trigger event.

As of December 31, 2025, Banca Transilvania Financial Group has a balance of RON 26.5 million of own shares, recorded at acquisition cost (~3.3 million shares), through its subsidiary investment fund, BT INVEST1.

The share buybacks that took place in 2025 are approved by the Resolutions of the Ordinary and Extraordinary General Meeting of the Shareholders of Banca Transilvania S.A of 28.04.2025, when the Bank approved the buyback of up to 5,000,000 shares, within an employee stock option plan program in order to implement a remuneration system and run a staff loyalty program for a period of at least 4 years, as well as the payment of fixed remunerations, respectively the granting of a mandate to the Board of Directors.

BOND PROGRAMMES LAUNCHED IN 2025

Since 2023, Banca Transilvania has raised close to EUR 3 billion (equivalent) through bond issuances under its two programmes. Except for the RON denominated issuance and the subordinated bond placement, all bonds are listed on Euronext Dublin, enhancing transparency and access to international capital markets. These transactions have broadened and diversified the Bank's investor base, supported long term funding resilience and strengthened BT's international visibility, while showcasing its financial performance, sustainable growth trajectory and the investment case of the Romanian economy.

Banca Transilvania's bond issuances are structured under two complementary Euro Medium Term Note (EMTN) programmes: [the EUR 1,000,000,000 EMTN Programme](#) and the [EUR 1,500,000,000 EMTN 2 Programme](#). Together, these programmes provide a flexible and scalable funding framework, supporting the Bank's medium-term financing needs while ensuring continued access to international capital markets. The use of parallel programmes enhances funding diversification, strengthens balance sheet resilience and underpins BT's disciplined approach to capital planning, in line with its long-term growth strategy and sustainability objectives.

Throughout 2025, BT supported two bond issuances:

XS3109437387

Banca Transilvania attracted RON 1.5 billion, a record issue in the local banking system. Banca Transilvania announced the successful completion of its first sustainable bonds issue in RON, on the [Bucharest Stock Exchange](#), which was received with high interest by local investors.

In the initial hours following the launch, approximately **50% of subscriptions were placed by Romanian institutional investors**, including investment and pension funds, commercial banks, insurance companies and trading firms. At the same time, the issuance drew interest from **international investors**, with support from **anchor investors such as development banks and international funds**, reinforcing the credibility of the transaction.

The issuance consisted of **senior non-preferred bonds** with a **7-year maturity**, a **call option after 6 years**, and a **coupon of 8.875%**. The bonds qualify as **MREL-eligible instruments**, contributing to the Bank's loss-absorbing capacity in line with European regulatory standards. Proceeds will be used to finance **sustainable projects** in accordance with the BT Sustainable Finance Framework.

This RON-denominated issuance further diversified investment opportunities for local investors. Together with the capitalization of a significant portion of the prior year's profits, the funds raised support continued lending to both corporate and retail clients, with a direct positive impact on economic growth.

The bond sale was coordinated by J. BT Capital Partners, Alpha Bank S.A., Banca Comercială Română S.A, Raiffeisen Bank, The Bank of New York Mellon.

Rating: BBB- by Fitch

XS3239211132

Banca Transilvania successfully executed its first [AT1](#) (Additional Tier 1) bonds issue on the Dublin Stock Exchange, strengthening its reputation as a leading and attractive participant in the international capital markets.

The transaction benefited from strong investor interest from the outset, with more than **40 leading institutional investors** expressing early participation. Within **two hours of launch**, the order book reached approximately **EUR 2 billion**, peaking at around **EUR 3.25 billion** following the entry of US-based investors. Final demand exceeded **EUR 2.65 billion**, representing an **oversubscription of 5.3 times** the targeted issuance size. In total, **over 180 high-quality investors**—a record for Banca Transilvania's bond issuances— from the European Union, the United Kingdom, the United States and other international

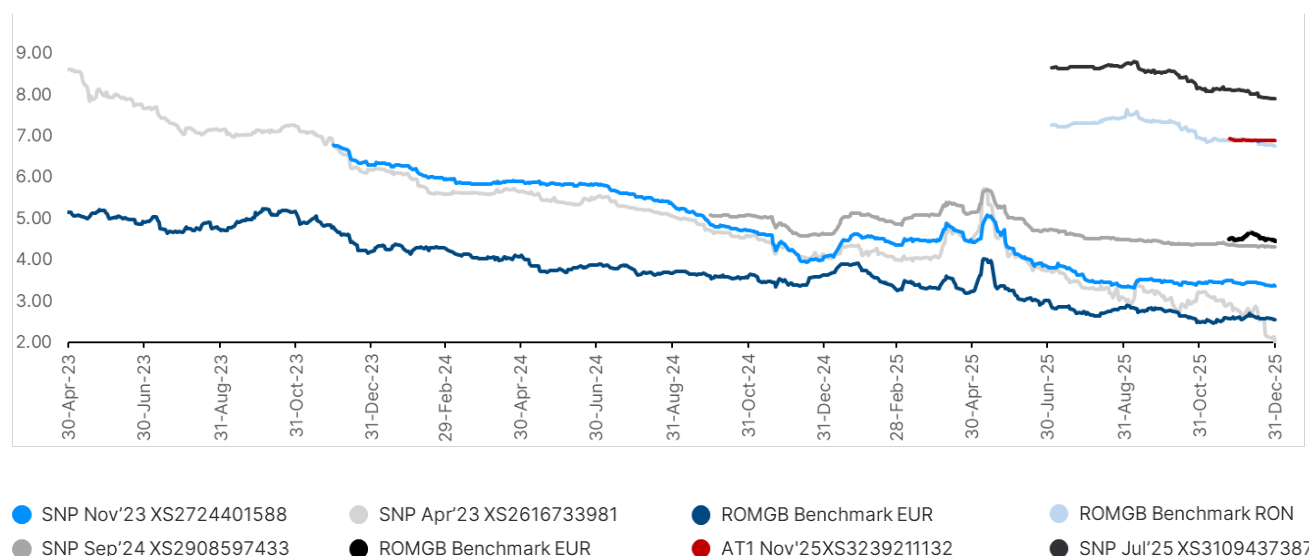
markets participated in the transaction, supporting a strong outcome in terms of both market reception and pricing.

The issuance comprised **EUR-denominated Additional Tier 1 capital securities**, contributing to the achievement of Banca Transilvania's capital objectives in line with its approved capital planning. The bonds carry a **coupon of 7.125%**, reset every five years, with a **first reset date of 27 May 2031**, and were issued on **27 November 2025**.

The transaction was coordinated by Bank of America Securities Europe S.A., J.P. Morgan SE, Morgan Stanley Europe SE and BT Capital Partners S.A.

Overall, Banca Transilvania's bond issuance programmes have strengthened the Bank's funding diversification, capital resilience and access to international capital markets. Through disciplined execution, strong investor engagement and the integration of sustainability considerations, these programmes have supported regulatory compliance, long-term financial stability and sustainable growth. By consistently aligning funding activities with its strategic objectives and market best practices, Banca Transilvania has reinforced its capacity to support the Romanian economy while maintaining a robust and forward-looking capital structure.

TLV BONDS PERFORMANCE



PROFIT AND LOSS ACCOUNT – YEARLY DYNAMICS

Items of the statement of profit or loss as of 31 December 2025, as compared to 2024 and the budgeted figures for 2025:

RON million	BANK				GROUP		
	Realized 2025	Budget 2025	Realized 2024	Δ 2025/ 2024	Realized 2025	Realized 2024	Δ 2025/ 2024
	(1)	(2)	(3)	(4)=(1)/ (3)-1	(5)	(6)	(7)=(5)/ (6)-1
Total Operating Income	9.786	9.587	8.224	19,0%	11.661	10.061	15,9%
of which							
- net interest income	6.631	6.814	5.532	19,9%	8.066	6.908	16,8%
- net commission income	1.388	1.561	1.268	9,5%	1.623	1.488	9,1%
Operating expenses	(4.344)	(4.356)	(3.732)	16,4%	(5.441)	(4.859)	12,0%
Operating result	5.442	5.231	4.492	21,1%	6.220	5.202	19,6%
Bargain gain	-	-	-		121	816	-85,1%
Net provisions	(622)	(543)	(332)	87,3%	(832)	(575)	44,6%
Gross profit	4.819	4.688	4.160	15,9%	5.510	5.442	1,2%
Income tax expense (-)	(724)	(770)	(628)	15,3%	(849)	(712)	19,3%
Net profit	4.095	3.918	3.532	16,0%	4.661	4.731	-1,5%

*Due to rounding, the numbers presented in this document may not add up exactly to the total presented and the percentages may not accurately reflect absolute numbers.

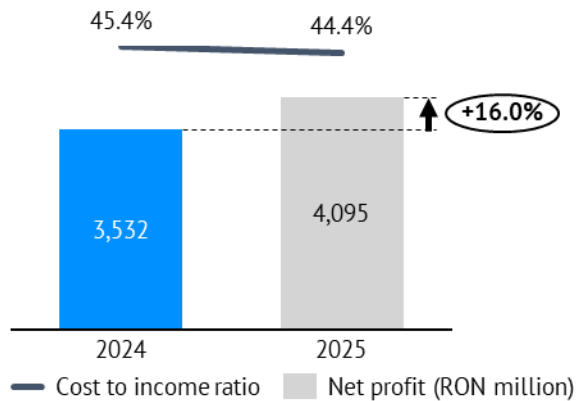
Gross Profit (31.12.2025)

- Banca Transilvania Financial Group: RON 5,510 million, +1.2% compared to 2024
- Banca Transilvania: RON 4,819 million, +15.9% compared to 2024

Net profit (31.12.2025)

- The Group's net profit amounted to RON 4,661 million in 2025, confirming the solid operational performance and the efficiency of the business model. Compared to 2024, it decreased by 1.5%; however, excluding the impact of the bargain gain, the increase would have been 16.0%.

- At Bank level, net profit exceeded RON 4 billion (RON 4,095 million), up by 16.0% compared to 2024, reflecting the strong performance of commercial activity and continued operational efficiency.



Bargain gain

- The gain from the acquisition of O.C.N. Microinvest S.R.L. in amount of RON 120.2 million does not constitute a taxable transfer and represents the difference between the consideration paid (in amount of RON 331.9 million) and the part of the fair value of the assets and liabilities of O.C.N. Microinvest S.R.L. on the date of taking control (in amount of RON 452.1 million).
- In the period of 3 months until December 31, 2025, O.C.N. Microinvest S.R.L. contributed to the consolidated profit or loss situation with the amount of RON -42.9 million. If the acquisition had taken place on January 1, 2025, the contribution to the consolidated profit would have been of RON 46.5 million.

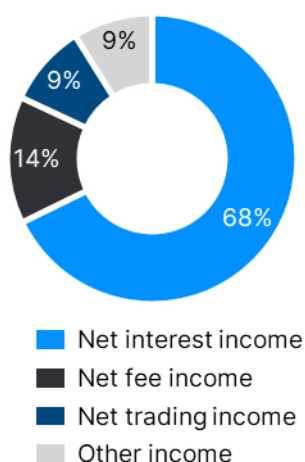
Cost/Income Ratio (31.12.2025)

- At Group level, the cost-to-income ratio stood at 46.7%, decreasing by 1.6 percentage points compared to 2024 (48.3%).
- At Bank level, the cost-to-income ratio improved by 1 percentage point, reaching 44.4%, as a result of the operational efficiency measures implemented throughout 2025, despite the doubling of the turnover tax from 2% to 4% starting with the second half of the year. Excluding the impact of the turnover tax – which adds nearly 5 percentage points – the cost-to-income ratio would be 39.4%.

Operating income (31.12.2025)

Operating income amounted to RON 11,661 million at Group level, compared to RON 10,061 million in 2024. At Bank level reached RON 9,786 million, up 19.0% versus 2024 and 2.1% above the budgeted level, driven by the expansion of business volumes, both through increased lending to individuals and companies, as well as through the higher volume of transactions carried out via the Bank.

BT Operating income



The most important income categories are the following:

- Net interest income: RON 8,066 million in 2025 at Group level, up 16.8% compared to the previous year. At Bank level, net interest income increased by 19.9%, reaching RON 6,631 million, with income from securities contributing significantly—representing 47.1% of the total, respectively 3,121 million.
- Net fees and commissions income: At Group level increased by 9.1%, reaching RON 1,623 million, while at Bank level it grew by 9.5%, reaching RON 1,388 million. The positive evolution compared to the previous year is mainly due to a 19% increase in the number of card transactions.
- Net trading income: Up 30.8% at Group level and 26.4% at Bank level, driven primarily by higher net foreign exchange transaction income, as well as positive net income from derivative instruments. At Bank level, foreign exchange transactions account for 84% of total net trading income.

Operating expense before net expenses with impairment allowance and provisions for other risks and loan commitments amounted to RON 5,441 million at Group level, compared to RON 4,859 million in 2024. At Bank level, operating expenses increased by 16.4%, reaching RON 4,344 million, up from RON 3,732 million in 2024. The evolution of these expenses at Bank level was influenced, in addition to ordinary activity, by the doubling of the turnover tax from 2% to 4% starting July 2025, which totaled RON 487 million for the reporting year (RON 269 million in 2024). Of the increase in operating expenses, 13.3 percentage points are attributable to the turnover tax.

Personnel expenses: increased by 4.0% at Group level and by 11.2% at Bank level (2025 vs. 2024), driven by the 4.5% expansion of the employee base and related benefits. The Bank continued its performance-based Stock Option Plan, under which high-performing employees may exercise their right and option to purchase a number of shares issued by

the Bank. This program generated personnel expenses of RON 141 million in 2025, up 16.8% compared to 2024.

Pre-provision operating profit: increased by 19.6% in 2025 compared to the previous year, reaching RON 6,220 million at Group level. At Bank level, operating profit amounted to RON 5,442 million, up 21.1%, supported by higher operating income generated by the Bank's organic growth and by the strategic initiatives aimed at strengthening its position in the banking sector through acquisitions.

Net Provision Expenses: increased to RON 832 million at Group level (including recoveries from off-balance sheet loans), of which the Bank recorded RON 622 million, resulting in a cost of risk that remains below 1% (0.59%).

PRUDENTIAL INDICATORS – STABILITY AND FINANCIAL DISCIPLINE

Among the indicators monitored by the National Bank of Romania through the prudential supervision system, the most significant for the assessment of the bank's evolution are:

Ratio	BT level 31.12.2025	BT level 31.12.2024
Core tier one ratio	17.77	20.83
Tier 1 ratio	20.70	20.83
CAR	22.71%	23.69%

The capital adequacy ratio is well above the regulatory minimum requirement of 8%, standing at a comfortable level of 22.71%, without the profit of the second half of the year 2025 included. An adequate level of capital and overall financial ratios has been maintained, in line with the prudent banking practices.

Buffer to MDA restriction as of 31 December 2025: 485 bps (individual) and 380 bps (Group level).

Available distributable items (ADI) as of 31 December 2025: RON 4.73 billion.

PERFORMANCE OF THE BANK'S BUSINESS LINES – GROWTH ACROSS ALL VERTICALS

BT continued to be the main financier of the Romanian economy, mobilizing the largest resources in the banking system to support companies, individuals, and Romania's strategic projects.

The number of active customers increased by 9% in 2025 compared to 2024, from 4.57 million to 4.99 million, with the following breakdown by business lines:

BT Active clients*	31.12.2025	31.12.2024	2025/2024
Large Corporate Clients	1,750	1,509	+16.0%
Medium Corporate Clients	9,029	8,761	+3.1%
SME Clients	26,218	25,002	+4.9%
Micro Business Clients	499,164	448,472	+11.3%
Retail Clients	4,448,962	4,088,127	+8.8%
TOTAL	4,985,123	4,571,871	+9.0%

*The classification of legal entities into segments is regulated by internal standards which set the conditions for the classification of clients per business segments.

The Bank's entire corporate loan portfolio accounts for approximately 60% of total gross loans, with the following split between local-currency and foreign-currency exposures: 45% RON and 55% FCY.

Large Corporate Clients

- The Large Corporate business line focuses on financing large scale projects with strategic impact in the transition to a sustainable economy. In this area, BT supports major companies that develop or operate critical infrastructure and highly complex investments – for example, from the production and distribution of renewable energy to extensive electric mobility networks or major energy efficiency projects. Investments in green buildings, low emission transport and logistics, sustainable industrial modernization, or resource management projects are prioritized, reflecting the bank's commitment to facilitating responsible development of sectors essential to the economy. At the same time, BT remains a strong partner for projects in healthcare, education, and social infrastructure, where the transformational potential and positive community impact are significant relative to the beneficiary's financial size.
- The gross loan portfolio of the business line reached 36 billion RON at Group level (+12.6% versus December 2024), and 36 billion RON at Bank level by the end of 2025, up 22.4% compared to year end 2024.
- The portfolio includes syndicated and bilateral financings, with values ranging from several tens to several hundreds of millions EUR, directly contributing to strategic investments: Nusco City – EUR 51 million, Electrica – RON 757 million, Pehart – EUR 60 million.
- With a 34% share of the total loan portfolio, the Large Corporate segment focused on deepening long term lending relationships, managing a loan portfolio that has nearly doubled compared to five years ago.

Medium Corporate, SME & Micro Clients

- The Medium Corporate, SME, and Micro business line supports the development of Romanian companies through dedicated financing and tailored banking solutions for every stage of growth, with an expanding portfolio driven by new lending and the integration of the OTP Bank acquired portfolio.
- Gross loans increased by +16.7% at Bank level and +3.5% at Group level, reaching 26.7 billion RON (Bank) and 28.5 billion RON (Group) in 2025, influenced by:
 - Portfolio growth through acquisitions, with 2.3 billion RON of loans taken over from OTP Bank as of December 2025;
 - New loans granted to Medium Corporate, SME, and Micro clients totaling approx. 9.9 billion RON;
 - Over 15,000 loans are securitized under the synthetic non-STS securitization transaction concluded on 22 December 2023 with the European Investment Fund (EIF) and the European Investment Bank (EIB), effective from 31 March 2024. The securitization covers a loan portfolio initially valued at 2,027.5 million RON. BT retains at least 5% of each exposure in the securitized portfolio. Credit risk on the mezzanine and senior tranches is transferred to EIF, while the junior tranche (1.6% of the initial portfolio) is retained by the Bank. The guarantee is scheduled to mature on 31 December 2039.
- BT has invested time and resources into improving BT Go, the all-in-one banking platform for entrepreneurs. It has grown into a flexible business ecosystem with 544,000 users and transaction volumes exceeding 351 billion RON, offering a wide range of features.
- BT Go continues to differentiate itself through an integrated digital ecosystem that enhances entrepreneurs' autonomy and simplifies the management of financial and administrative operations. Recent developments include: recurring payments, opening and closing savings accounts directly in the app, expanded services for clients in Italy (instant euro payments, automatic beneficiary verification).
- A major milestone is the digital onboarding process for companies, enabling 100% online business account opening directly in the app, without physical documents or branch visits. Eligible entrepreneurs can become BT clients quickly using only company data and the legal representative's ID.
- A distinctive element of BT Go is its full integration with FGO, the intelligent invoicing solution in BT's ecosystem. Companies can issue invoices, automatically send documents to the ANAF e-Invoice system, receive supplier invoices, and pay them directly from the app — all aligned with the company's financial flows.
- Additional advanced features include online full loan repayment, instant issuance of business cards, and integrated investment tools.
- These capabilities strengthen BT's position as a leader in digital banking for companies and in developing a complete digital ecosystem for entrepreneurs.
- Micro clients, part of the Mid Corporate & SME segment, increased by 50% in the past five years, reaching 499,164 clients (+11.3% versus 2024).

- At Group level, loans granted reached 6.8 billion RON. BT Mic continues to facilitate access to financing and business-development services through the Stup initiative. The entrepreneurial community exceeded 40,000 members, generating: over 10,000 business services purchased by entrepreneurs, more than 7,000 digitalization products acquired by 4,300 entrepreneurs, over 880 businesses launched within the community.

Retail clients

- At Group level, retail loans exceeded 44.9 billion RON, up 10.4% from 2024, driven by both acquisitions and organic growth.
- Retail clients were a key strategic focus in 2025:
- Active clients increased by 8.8% to almost 4.4 million. Over 470,000 individuals became BT clients in 2025, plus 130,000 clients migrated through the OTP integration. A significant share opened their accounts directly via BT Pay with no branch visit.
- BT is the market leader in cards, with 8.1 million cards in its portfolio. Card transactions increased by 19% year over year.
- BT has 4.9 million digitalized unique clients using BT Pay and internet/mobile banking. These customers use the internet and mobile banking service—BT Pay. We are seeing a clear trend of growing interest in digitalization, with customers increasingly preferring innovative solutions that allow them to easily and efficiently manage financial services in the digital environment, such as virtual cards, credit and savings products, insurance, investments, and private pensions.
- The Bank reached 5.7 million unique cards enrolled in BT Pay, Apple Pay, Google Pay, Fitbit Pay, and Garmin Pay, mobile payments at merchants grew in 2025 by 29% vs. 2024. Money transfers from cards enrolled in BT Pay increased by 70%. Non card digital transactions grew by 24% year over year.
- The Bank also operates 577 BT Express terminals used for various transactions other than cash withdrawals, has over 178,000 POS terminals installed, 40,000 STAR partner locations, and collaborates with over 8,000 e-commerce merchants. By the end of 2025, Chat BT had surpassed 1.5 million interactions. Thanks to continuous optimizations—fast and intelligent responses, multilingual support (RO, EN, IT, HU), dynamic personalization, access to tutorials and resources, and tailored insights—by the end of the year, over 80% of customers were finding the information they needed on their own, and 20% of conversations are handled by a consultant (live chat conversion rate: 20%).
- The Premium segment grew in 2025 to approximately 150,000 Premium and Private customers and was expanded nationwide. BT now has Relationship Managers dedicated to Premium customers in most urban centers and a dedicated team of Virtual Relationship Managers nationwide. The Premium Banking offering was enhanced in 2025 with the launch of an exclusive product for Premium customers—the Premium Club Subscription.

- Starting in August 2025, Banca Transilvania customers can enroll directly, via the BT Pay app, in the voluntary pension funds (Pillar III) managed by BT Pensii. Since the launch of this feature, over 8,600 customers have chosen to save for the long term in one of the two voluntary pension funds—Pensia Mea and Pensia Mea Plus.

Treasury

Treasury activities complement the product and service offering across all five business lines. Strategic principles include:

- Prudence – managing excess liquidity, aligning asset–liability maturities, managing interest-rate structure and market risks within BT’s Risk Strategy and regulatory requirements.
- Risk diversification – setting and monitoring counterparty exposure limits across all treasury products.
- Maximizing income prudently – integrating medium- and long-term macroeconomic trends.
- Supporting commercial lending growth – through pricing strategies and balance-sheet management (ALM).
- Developing hedging products and client solutions – including market access and digital price distribution.

A significant portion of revenue continues to be generated by fixed-income transactions, where the focus is on reducing the volatility of results. This objective is achieved by focusing on held-to-maturity portfolios, designed to ensure a high level of high-quality liquid assets (HQLA) with easy access to liquidity under adverse market conditions. In certain situations, this approach is complemented by various interest rate risk hedging strategies.

Foreign-exchange operations also grew alongside broader bank activity. Net consolidated FX income increased by 10.9% from 2024, reaching 883 million RON in 2025.

2026 OUTLOOK – STRATEGIC DIRECTIONS AND FINANCIAL PERSPECTIVE

STRATEGIC OBJECTIVES, DEVELOPMENT PLAN AND PROPOSALS REGARDING THE FINANCIAL POSITION AND THE PROFIT AND LOSS ACCOUNT FOR 2026

Qualitative objectives

- Reinforcing our leadership as the largest fully integrated financial group in Romania by sustained organic growth and by remaining open to acquisitions or mergers that can further accelerate our expansion.

- Consolidating our top position across all business segments and financial services sectors, while deepening synergies across BT Group companies to unlock an improved, seamless client experience.
- Supporting Romania's economic development by prioritizing lending in nationally strategic sectors – such as energy, infrastructure, healthcare, agriculture, education – while continuing to finance businesses of all sizes. BT will remain a trusted partner for national and European programs, sustaining companies and projects that accelerate the absorption of EU funds.
- Strengthening our position as the bank with top customer satisfaction in Romania by consistently enhancing service quality and continuously improving customer experience across all channels.
- Continue our ESG initiatives to contribute to a sustainable development of the Romanian economy.
- Digital: continue to enhance operational efficiency across the BT Group by advancing automation and streamlining processes, supported by sustained investments in technology and IT infrastructure. Our focus remains on delivering secure, resilient and reliable digital platforms, while ensuring rapid adaptation to the evolving needs of customers in all markets we serve.

Quantitative objectives

- Total assets: +6.4% growth
- Total gross loans: +8.5% growth
- Total deposits from customers: +5.8% growth
- Cost/Income ratio: 45.6% (39.4% without turnover tax)
- Loans/deposits: 64.8%

DEVELOPMENT PLAN FOR 2026

Investment budget for 2026 (RON million):

Buildings – agencies and branches	105.94
Investments IT and cards, of which:	663.17
Hardware IT	34.23
Software IT	407.82
Retail and cards, of which:	221.11
Hardware retail cards	51.92
Software retail cards	169.19
Cars	21.39
Security	9.79
Cash processing center	7.88
Digital initiatives	177.22
Other	32.00
Total Investments RON million, VAT included	1.017.40

PROPOSALS REGARDING THE FINANCIAL POSITION AND THE PROFIT AND LOSS ACCOUNT 2026

In projecting indicators for 2026, an average inflation rate of 6.1% and an exchange rate of 5.17 LEI/EUR were taken into consideration.

An increase of total assets by 6.4% was estimated compared to the level recorded in 2025 (reaching RON 223,765 million). In the structure of assets, were considered: 51.7% weight of gross loans, 23.5% weight of immediate liquidity and 25.2% investments in securities.

Regarding the structure of liabilities and equity projected for 2026, an increase of 5.8% in non-bank customer deposits compared to 2025 has been considered, resulting in a projected 89.0% share of these resources in total liabilities.

The budgeted income and expense indicators for 2026, submitted for approval to the General Meeting of Shareholders, are defined to support the proposed business objectives and are aligned with the specific prudential and supervisory regulations applicable to the banking sector.

The elements from the Statement of Financial Position and the Statement of Profit or Loss proposed for 2026 are as follows:

Statement of Financial Position (RON million)	Budget proposal 2026
Cash and cash equivalents	52,484
Investment securities	56,312
Loans and advances to customers (gross)	115,731
Loans provisions	(6,985)
Fixed assets	3,106
Equity investments	1,373
Other assets	1,743
Total assets	223,765
Deposits from customers	178,671
Deposits and loans from financial institutions	16,621
Subordinated liabilities	1,014
Other liabilities	4,452
Total liabilities	200,758
Equity	18,662
Profit/Loss for the year	4,345
Total equity	23,007
Total liabilities and equity	223,765

Profit and Loss Account (RON million)**Budget proposal 2026**

Interest income	11,658
Interest expenses	(4,546)
Net interest income	7,112
Net commission income	1,563
Net trading income	1,521
Contribution to the Guarantee Fund	-
Other income	583
Total income	10,779
Personnel expenses	(2,384)
Other operating expenses	(1,911)
Depreciation and amortization	(501)
Other expenses	(120)
Total expenses	(4,916)
Net impairment charges	(750)
Profit before tax	5,113
Income tax	(768)
Net income	4,345



THE PEOPLE OF BT. HUMAN RESOURCES MANAGEMENT

- People at the core of numbers
- Organizational culture and climate – BT Employee Experience Index
- Employee development and growth
- Performance management
- Talent attraction and recruitment
- Prevention of harassment and discrimination
- Remuneration policies and benefits
- Employee wellbeing, safety and protection
- Wellbeing initiatives & internal actions

In 2025, Banca Transilvania reaffirmed that it is, above all, an organization that puts people first, and its priorities in Human Resources were focused on attracting, developing, and retaining talent, with an emphasis on the skills of the future, managerial performance, and adaptation to market changes. These directions were aligned with Banca Transilvania's strategic objectives and supported the organization's ability to respond to a constantly evolving economic and technological environment by investing in continuous learning, leadership, digitization, and employee experience.

PEOPLE AT THE CORE OF NUMBERS

- Total number of bank employees: 10,898
- Number of active bank employees: 10,180
- Average age: 39
- 73% women and 27% men
- Staff turnover (2025 vs. 2024): 9.23% in 2025, compared to 9.06% in 2024.
- Almost 50% of Banca Transilvania Financial Group employees are mothers with children under the age of 18.

ORGANIZATIONAL CULTURE AND CLIMATE – BT EMPLOYEE EXPERIENCE INDEX

Developing a constructive organizational culture is a constant concern for the bank, with the desire to facilitate better collaboration between employees to achieve objectives and involve them in their own professional development, with the desire for Banca Transilvania to remain a place of work where employees enjoy coming to work, build authentic relationships, and have real opportunities for development.

For the ninth consecutive year, the **BT Employee Experience Index (BT EEI)** was conducted, an internal survey dedicated to measuring perceptions of the work environment and understanding how to improve the daily experience of employees at GFBT companies. The BT Employee Experience Index (BT EEI) is conducted twice a year and has the following main objectives:

- measuring the Employer Net Promoter Score (eNPS);
- measuring the quality of interaction between managers and the members of the teams they coordinate;
- measuring the extent to which Banca Transilvania's strategy is known to the entire bank team;
- collecting proposals/recommendations that can increase employee satisfaction;
- measuring the quality of collaboration with other colleagues in other departments, based on frequent professional interactions;

- evaluating the degree of collaboration with departments within the organization, based on interactions throughout the year.

In the summer 2025 edition, a new framework for measuring the organizational climate was introduced, focusing on dimensions with a direct impact on eNPS and employee motivation. These dimensions are monitored annually to understand what matters most to employees, with concrete actions to be defined at both the organizational and team levels to continuously improve the employee experience at Banca Transilvania Financial Group.

At the same time, in the summer edition of the internal BT Employee Experience Index study, colleagues considered to be models of collegiality, collaboration, and support were designated—those who demonstrate desirable attitudes at the organizational level. Also in this iteration, the departments/divisions with which employees interact most often in their daily work and whose speed of response and resolution of requests are particularly appreciated were evaluated.

The participation rate of Banca Transilvania Financial Group employees was 85% in the survey conducted between July and August 2025 (compared to 89% in the January-February edition), with over 9,490 responses (vs. 9,213 in January-February) that were analyzed and used to make a series of decisions to improve the organizational climate.

EMPLOYEE DEVELOPMENT AND GROWTH

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

There was a record level of participation in learning programs, totaling approximately **681,350 hours of training**, delivered through a combination of formats: classroom sessions, webinars, and e-learning programs. The program portfolio evolved throughout the year to meet both the bank's immediate operational needs and its medium- and long-term strategic objectives.

93% of the training programs were dedicated to strengthening technical and specialized skills, covering essential areas such as banking products and services, operational flows, financial analysis, project management, legal, and IT. This focus supported the growth of internal expertise and the alignment of employee skills with the requirements of an ever-changing financial environment.

In order to structure and support the learning process in a coherent manner, training programs were organized in **two main academies**, which covered distinct development needs and supported the professional paths of employees, depending on their role, level of experience, and area of activity.

Leadership and Management Academy

- **Be the Manager** – A program dedicated to early-career and mid-level managers, focused on strengthening essential management and leadership skills.
- **Leadership Program** – Developed in collaboration with professors from Harvard Business School. This program is designed for senior managers in the BT Group, with the aim of developing strategic leadership skills.
- **Intelligent Relationships** – A program for senior and mid-level managers in the BT Group, designed to improve collaboration and the effectiveness of professional relationships within the organization.
- **Leadership Journey program** – Dedicated to Head Office Directors, together with professors from the prestigious EMBA Maastricht program
- **START BT_Leadership in Action** – A 6-month program dedicated to training the successors of Branch Directors.

Sales Academy

- **Entrepreneurship** – A program dedicated to developing entrepreneurial spirit, based on modern methods, including Business Model Canvas and GROW, offering participants practical and applied experiences.
- **SME Business School** – A program designed for teams in the SME and Microbusiness segment, this program focuses on developing sales skills and identifying customer needs, contributing to building sustainable business relationships.
- **Sales Caravan** – A project specially designed for customer relationship specialists, with the aim of developing sales skills in a flexible and accessible format, adaptable to local realities (Telephone Approach and Consultative Selling).
- **Individual coaching programs**, delivered by internal and external coaches, which support the development of managerial skills and the process of assuming the role of manager.

Alvolution

Alvolution was a special initiative in 2025, with the goal of facilitating cultural transformation through artificial intelligence. A bold internal project, at a time when AI is only beginning to be widely understood, but one that promises to profoundly transform the way employees work, collaborate, and innovate. Developed by HR in the first phase for implementation at the IT team level, it was gradually extended to the entire organization,

targeting the way employees work, collaborate, and innovate through the responsible and efficient adoption of AI technologies.

Alvolution addressed two business needs: (1) increasing operational efficiency in all areas of activity by reducing the volume of "busy work" and (2) developing employees' digital skills to support new working models and transformation projects. Among the results that measure the impact of the project:

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

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

Learn from Home

Intended for network employees, this benefit was accessed by 851 colleagues in 2025.

Webinars developed in 2025:

- **Meaningful Finance – The Fundamentals of Financial Education** – The course provides essential knowledge about personal money management, saving, and financial planning. Participants prioritize their own financial needs and discover simple and accessible strategies for responsible, long-term management of financial resources.
- **Meaningful Finance – First Steps in Investing** – The program introduces the concepts of investing, the benefits of investment funds, and the BTAM range. Participants analyze financial options such as funds, savings, direct investments in stocks, and optional pensions, with access to real-life examples and simulations.

PERFORMANCE MANAGEMENT

In the context of the organic growth strategy adopted by the company, it is essential to develop a solid internal capability to support long-term performance delivery. This approach requires a clear alignment of individual efforts with organizational objectives. To this end, changes were introduced in 2025 to the annual performance management process, with the aim of stimulating genuine performance, real employee engagement, and a better correlation between individual and company results.

- **Cascading objectives and horizontal alignment** – clear frameworks for top-down cascading of the bank's priorities were introduced, whereby strategic objectives are communicated from management to teams, as well as mechanisms for horizontal alignment between business areas. Together, these increase clarity, guide actions, and make the performance management process more relevant, consistent, and effective.
- **Strengthening the individual objectives component** – adding a new category, "Individual Objectives", with a weighting of **40%**, equal to that of collective objectives (**macro-indicators, NPS**) to more clearly highlight each colleague's contribution to the bank's results, while annual performance more strongly reflects individual performance, while maintaining a balance between personal contribution and accountability for the bank's performance.
- **Relevant skills and results-oriented development** – To ensure sustainable performance, skills with a direct impact on individual objectives were kept in the foreground, selecting **a maximum of three relevant skills** annually. In addition, a **development objective** was introduced to prioritize those needs that best support the proposed performance.
- **Calibrating performance for fairness and consistency** – Individual performance **calibration frameworks** were created to ensure fairness and greater objectivity in the assessment stage, as well as consistency across the bank in applying the process.

TALENT ATTRACTION AND RECRUITMENT

The 2025 approach to recruitment was an integrated one, focused on both meeting operational needs and supporting long-term performance and retention. The profile sought emphasized behavioral skills essential to the bank's business model—the ability to collaborate, autonomy, customer focus, and adaptability in an ever-changing environment.

The bank continued to implement and develop projects with an impact on recruitment and retention, focusing on improving the experience of candidates and new employees,

streamlining selection processes, and increasing the quality of integration into the organization.

A differentiating factor was the launch of the first Employer Branding spot and external promotion supported by dedicated campaigns that ensured greater visibility for the employer brand.

BT Career Plan

Developed to ensure predictability and transparency of promotion and professional development opportunities at BT. This program is active in the BT network and in the relevant departments at headquarters, benefiting approximately 830 employees in 2025.

Internship at BT

- Three internship projects were implemented with funding from the European Social Fund:
 - **Two internship projects aimed at students:** "Good experiences keep us together" and "From the bench to the Bank – the first steps towards discovering your career." In both projects, planned until 2027, the goal is for **800 students** from economics and technical faculties across the country to do internships at BT headquarters.
 - **An internship project for high school students:** "Internships and training for valuable professionals," where, in partnership with the "Costin Kirițescu" Economic College in Bucharest, **268 students** are doing internships at BT for a period of 3 years.
- **Programs for students:** Engineering Summer University, in collaboration with the Technical University of Cluj Napoca, in which over **100 students interested in technical programs and projects** took part; Junior Summer University in collaboration with Babeș-Bolyai University, in which over **100 students interested in finance and banking** took part; Global Money Week, attended by *120 middle school students from Cluj-Napoca*, Scoala altfel (A Different Kind of School), attended by **130 primary school students**, and an event dedicated to financial education with over **120 high school students** interested in economic development, all in collaboration with the County School Inspectorate.
- **BT Bridge** is an initiative through which new colleagues from the Head Office connect with teams in the network to gain a direct understanding of the reality on the ground: BT customer profiles, service delivery, product portfolio, daily challenges, and best practices. At the same time, valuable ideas for improvement are collected, inspired by the experience of colleagues who work in direct contact with customers.
- **BT Loop:** a pilot project to streamline recruitment and retention processes for entry-level roles in the **Contact Center** and **Front Office**, initially implemented in **Cluj** and

Bucharest. The objective of the project is for *shortlisted candidates* to have direct experience in the work environment: to observe daily activities, how the company operates, and to interact with future managers and colleagues. This allows them to form a realistic picture of the activities and responsibilities before being hired.

- **BT First Pass:** an annual event that facilitates candidates' first contact with the banking field, providing access to relevant information, direct interactions with specialists, and practical experiences, as well as a clear perspective on the opportunities available at Banca Transilvania (participants in the 2025 edition – over 350).
- **RATIO Academy**, a project developed in partnership with the *Association of Accounting Students* at Babeş-Bolyai University in Cluj-Napoca, the largest educational camp in the field of economics. As part of the initiative, students from across the country participate in CFA-themed workshops and presentations, a project in which **over 80 students and pupils** took part.
- **Business Smart School**, a summer school organized by the Association of Economics Students at Babeş Bolyai University, Cluj-Napoca, which brings together students from all over Romania interested in entrepreneurship, in which **over 60 students and pupils** took part.
- **MindSpark**, a project organized by StudPAC at Babeş-Bolyai University, Cluj-Napoca, is a summer camp for pupils and students interested in marketing, communication, and advertising, in which **over 30 students and pupils** took part.
- The **Investment Club** within the Faculty of Economics and Business Administration is a community of passionate students interested in exploring the world of finance and investment. **Over 40 students** took part in the event organized by BT, debating macroeconomic topics.
- **Mathias Corvinus Collegium Leadership Training** is the largest private education and development institution for young people in Hungary, with extensive programs in Transylvania, receiving a visit from **20 students**.

PREVENTION OF HARASSMENT AND DISCRIMINATION

Banca Transilvania pays special attention to compliance with professional conduct rules, the prevention and management of harassment and discrimination, and the application of disciplinary measures, in accordance with the applicable legal framework and the bank's internal policies.

The main objective of the activity in this area was to maintain a safe, respectful, and fair working environment based on principles of integrity, responsibility, and mutual respect. All complaints received were analyzed impartially, confidentially, and within the established deadlines, through dedicated internal mechanisms that ensure the protection of the rights

of all parties involved. Following the investigations, it was found that **93% of the complaints of harassment/discrimination were unfounded**, with only one of them resulting in the sanctioning of an investigated colleague with a written warning.

BT continues to inform and raise awareness among employees about standards of conduct, the prevention of harassment and discrimination, and the channels available for reporting non-compliant situations.

Among the measures taken, BT continues to organize regular online training courses on topics related to diversity, non-discrimination and equal opportunities, health and safety, ethics, combating bribery, corruption, money laundering and cash theft, etc. In addition, the confidentiality of the whistleblowing complaint resolution mechanism is ensured to encourage the reporting of incidents of unfair treatment or discrimination.

Through these actions, Banca Transilvania reaffirms its commitment to an organizational climate based on respect, diversity, and inclusion, contributing to the consolidation of an ethical culture and supporting long-term sustainable performance.

REMUNERATION POLICIES AND BENEFITS

At Banca Transilvania, employee motivation mechanisms are constantly being developed, and the remuneration policy is approved by the Board of Directors. The bank ensures fair and competitive remuneration, strictly in line with skill and performance levels, with two balanced components: a fixed component and a variable component.

- **Fixed remuneration** reflects relevant professional experience and organizational responsibility, as set out in the job description, as part of the terms of employment. It is sufficiently consistent and represents a sufficiently large proportion of the total remuneration to allow for a fully flexible policy on variable remuneration components, including the possibility of not paying any component thereof.
- **Variable remuneration** reflects sustainable and risk-adjusted performance, as well as performance that exceeds the performance required to fulfill the duties set out in the employee's job description as part of the terms of employment. Variable remuneration is not guaranteed or automatically carried over from one year to the next. The mechanisms for distributing the variable component do not guarantee the award of amounts over several years. Variable remuneration is subject to an annual, fair review process.

In order to provide financial stability to its employees, in February 2025, Banca Transilvania indexed the salaries of all bank employees to the inflation index for 2024. A favorable

organizational climate promotes employee well-being and increases their desire to be involved and productive.

As part of its 2025 remuneration policy, Banca Transilvania maintained the current benefits granted to employees at the same level, ensuring their continuity in line with previous years' practices, in order to support a stable working environment and maintain a predictable framework geared towards long-term stability and retention.

EMPLOYEE WELLBEING, SAFETY, AND PROTECTION

Caring for employees is central to how Banca Transilvania builds its long-term performance and sustainability. Through continuous investments in employee health and experience, Banca Transilvania reaffirmed in 2025 its belief that sustainable financial performance is directly linked to the level of involvement, competence, and trust of the people who contribute daily to the organization's success.

Thus, traditional projects with a direct impact in the area of prevention were continued, such as:

- **The "Screening Saves Lives" program**, an initiative to detect the most common types of cancer, developed and run in collaboration with the Regina Maria Clinic Network. Banca Transilvania is perhaps the only company in Romania that offers such a program to all its employees, and all investigations within the program are free of charge. In 2025, **2,940 screening packages** were performed, and in cases where cellular changes were detected, prompt treatment saved lives.
- **Voluntary health insurance**, available to BT employees who have opted for this benefit, covers medical expenses resulting from accidents or illness, surgical procedures, with the additional option of a second medical opinion, as well as hospitalization and convalescence. By the end of October 2025, the insurance had been used by **2,979 colleagues** who had opened a total of **5,022 claims**.
- **Provision of additional medical benefits in a co-payment system**: 71 complex imaging investigations (MRI and CT) as well as access to kinesitherapy and physiotherapy services at Kinetic medical clinics.
- **Medical visits** by a Medical Advisor at the bank's headquarters.
- **Program for parents returning from parental leave**: the program helps with the gradual reintegration of employees after an absence of approximately two years. Parents have a flexible schedule during their first month back. Based on the positive feedback received after the launch of this program, this method of gradual reintegration into professional life for mothers has been maintained.

WELLBEING INITIATIVES & INTERNAL ACTIONS

Banca Transilvania has strengthened its wellbeing area by introducing two framework concepts: #GrijăDeTine (Care for Yourself) and #BineCuTine (Good for You), which have enabled the unified structuring of initiatives dedicated to physical, emotional, and mental health. The use of these visual labels has contributed to increasing the visibility of the programs among employees, facilitating quick orientation in the range of communication resources available internally.

#GrijăDeTine – Physical health, prevention, and medical education

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

Health webinars

A series of online sessions led by medical specialists (dermatology, pediatrics, mental health), who provided practical and accessible information. In 2025, over **650 employees** participated in these meetings.

Health assessments

- Enayati Medical City specialists performed physical assessments for **48 employees** in Bucharest.
- Evista partners provided medical optical services (via Diopron) for **over 250 employees** during two dedicated sessions.

Blood donation campaigns

Four donation sessions were organized in partnership with the Blood Transfusion Centers in Cluj-Napoca and Bucharest. Approximately 400 employees participated, of which 346 actually donated blood. The initiative focused on both volunteering and raising awareness about the importance of donation.

Educational videos and podcasts

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

- About the concierge doctor – Enayati Medical City
- Second medical opinion
- What the BT subscription includes
- The Enayati clinic network
- First aid – recorded webinar
- Premenopause – educational webinar
- Carefree summer – Regina Maria

- Modern psychology: ADHD, OCD – Regina Maria

#BineCuTine – emotional wellbeing, balance, and lifestyle

This category included programs that impact emotional, relational, and behavioral wellbeing:

Urban Camp – program for employees' children

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

Awareness of the importance of correct posture at the office & "Wellness moments by 7card"

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

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

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

Video resources and podcasts for emotional balance

Recorded educational materials focused on emotional and psychological health, such as:

- About psychotherapy – Regina Maria
- The code of male health: body, mind, and balance
- Understanding and overcoming the midlife crisis

Therapy and psychological assistance services for problems related to anxiety, stress, etc.

- Over **134 hours of internal psychological counseling**, supporting the 39 colleagues who requested assistance.
- A series of articles and advice in the field of psychology, under the umbrella of **Wellbeing**, which can be accessed on the bank's intranet (BT Hub).



RISK MANAGEMENT DISCIPLINE, CONTROL AND RESILIENCE

- Credit ratings
- Credit risk
- Liquidity and funding risk
- Operational risk
- Market risk
- Interest rate risk in the banking book
- Counterparty credit risk
- Reputational risk
- Risk of excessive leverage
- Strategic risk
- Capital risk
- Capital adequacy
- Compliance risk
- Internal and external audit
- ESG Risks (Environmental, Social and Governance)

CREDIT RATINGS

The recent assessments by Moody's and Fitch outline a complex risk profile, in which BT's structural strengths coexist with macroeconomic and sovereign pressures that directly influence the rating outlook. These effects are reflected across the main risk categories: sovereign, credit, capital, liquidity, and operational risk.

In November 2025, **Moody's Ratings** upgraded Banca Transilvania S.A.'s long-term deposit ratings to Baa1 from Baa2 and revised the outlook to negative from positive. At the same time, it upgraded the bank's long- and short-term issuer ratings to Baa2/P-2 from Baa3/P-3 and changed the outlook on the long-term issuer rating to stable from positive.

The confirmation of the basic rating (Ba1) reflects BT's solid capitalization and robust profitability, supported by its leading position in the Romanian banking market and a good operational efficiency.

The stable outlook on the bank's long-term issuer ratings reflects the bank's financial performance, and the expectation that its capital and profitability will remain resilient despite macroeconomic headwinds.

In 2025, **Fitch** maintained Romania's and Banca Transilvania's sovereign and bank ratings at BBB-, thereby preserving their Investment Grade status, but reaffirmed the negative outlook due to persistent macroeconomic imbalances.

The Fitch rating reflects Banca Transilvania's solid and well-established position in the Romanian banking system, as well as robust capital buffers supported by strong internal capital generation, a stable funding profile and reasonable asset quality, underpinned by conservative underwriting. The result confirms BT's track record in prudent risk management, sound lending policy, as well as the bank's operational efficiency.

The objective of Banca Transilvania Financial Group in terms of risk management is the integration of the risk appetite within the bank's decision-making process, by promoting the adequate balance between the assumed risks, the available capital and the performance targets, considering at the same time the tolerance to financial and non-financial risks.

In determining its appetite, capacity and risk tolerance, the BT Financial Group shall take into account all material risks to which it is exposed taking into consideration the specificity of its activity, business model, strategic and operational objectives, and applicable capital and liquidity requirements, its own risk management and control capacities, as well as the regulatory constraints.

The risk appetite within the Banca Transilvania Financial Group defines the maximum level the Group is willing to accept in order to achieve its strategic and business objectives. The overall approach is structured through the Risk Appetite Framework, which includes the Risk Appetite Statement (RAS), quantitative risk limits complemented by qualitative principles, as well as clearly defined roles and responsibilities for implementation and oversight.

Risk tolerance represents the level and types of risks that the bank, although not deliberately seeking to assume, is willing to accept under certain conditions, within a rigorous control environment. It reflects the concrete operational boundaries of the risk appetite assumed at the institutional level.

The risk management framework within the BT Financial Group is based on the following principles that apply to all activities and risk types:

- the existence of a solid culture in terms of risk management, both at the level of the Group's structures and at the level of its business lines;
- protection of the financial stability: The Group controls the risk in order to limit the impact of potential adverse events on the capital and profitability;
- limiting excessive risk-taking; the Group's risk appetite and tolerance must be consistent with its financial resources;
- ensuring a sound and sustainable capital and funding base;
- independent perspective: the risk management function is structured so as to identify, assess, monitor and report risks; the risk management function, as well as the compliance and internal audit functions operate independently of the activity lines that they monitor and control, in order to ensure the integrity of the Group's control processes;
- portfolio diversity in order to prevent excessive concentration risks;
- limiting concentrations and volatility of income sources;
- homogenous approach and global risk monitoring at Group level;
- compliance with the rules and regulations imposed by national and international authorities in the field;
- existence of certain operational continuity plans for the banking activities;
- drafting and periodic revision of the recovery plan at the level of the BT Group;
- BT Financial Group does not carry out activities in jurisdictions that reduce transparency, such as off-shore jurisdictions, or via certain structures that decrease transparency.

Risk management is an integral part of all decisional and business processes that take place in the Banca Transilvania Financial Group and in this regard, the management team:

- Continuously assesses the risks likely to affect the business and goals and takes actions whenever any changes appear in its business conditions.

- Ensures the existence of an adequate activity management framework within the Group, considering both internal factors (the complexity of the organizational structure, the nature of the activity, staff quality and fluctuation) and external factors (macroeconomic factors, legislation changes, competition changes in the banking sector, technological progress);
- Identifying the risks: The Group's exposure to inherent risks through day-to-day operations and transactions (including lending, dealing, capital market activity, asset management and other specific activities) is identified and aggregated through the risk management infrastructure implemented at the Group Level;
- Assesses/measures risks: An evaluation of the identified risks is carried out through specific models and calculation methods: a system of ratios with related limits, a methodology for assessing the risk events likely to generate losses, calculation methodology for specific credit risk provisions, assumptions regarding the future evolution of assets' value, etc.;
- Monitors and controls risks: The policy and the procedures implemented for an effective risk management are meant to mitigate risks inherent to the bank's business. The bank implemented procedures for the supervision and approval of decision and trading limits per person/ unit/ product etc. Such limits are monitored daily/ weekly/ monthly depending on operations.
- Reports the risks: Periodic and transparent reporting mechanisms have been established for specific risk categories so that the management body and all relevant structures benefit in a timely manner from accurate, concise, intelligible and meaningful reporting, but can also exchange relevant information on the identification, measurement or assessment and monitoring of risks;
- Calculates and evaluates internal capital and internal capital requirements: In order to assess the adequacy of the internal capital to risks at Group level, all the significant risks to which the Group is or may be exposed to are identified and assessed, by a continuous evaluation of the internal capital and internal capital requirements, to cover the bank's business needs and of the related risks, including through stress tests.

The risk management framework includes internal regulations, risk limits and risk control mechanisms, adapted to the proper functioning, financial soundness, capital base and strategic objectives of the credit institution, which ensure proper, timely and continuous identification, assessment, monitoring, mitigation and reporting of the risks related to the bank's activities, as a whole, as well as at the business lines' level (Large Corporate, Corporate, SME, micro and retail).

The main risk categories to which the BT Group is exposed to, are:

- Credit risk;
- Liquidity and credit risk;
- Operational risk;

- Market risk;
- Interest rate risk in banking book;
- Counterparty credit risk
- Reputation risk;
- The risk associated with excessive usage of leverage;
- Strategic risk;
- Capital risk;
- Compliance risk;
- ESG risk.

Banca Transilvania aims to maintain a balanced risk profile, calibrated at a medium level, in line with its business model and sustainable growth strategy. The risk appetite for each significant risk is explicitly defined within the corresponding governance framework and is continuously monitored through a structured set of relevant indicators.

These indicators allow for the continuous assessment of the risk position, the early identification of deviations from established limits, and ensure that operational and strategic decisions are carried out within the boundaries of the risk profile assumed by the bank

CREDIT RISK

Banca Transilvania manages credit risk in line with a solid risk management culture, emphasizing portfolio quality, capital protection, and sustainable value creation. Credit risk governance is embedded within a fundamental internal regulatory framework, which includes the risk strategy, the general lending standards and rules applicable to both individuals and legal entities, the counterparty and country risk policies, as well as the procedures associated with collection, remediation, and restructuring processes. Taken together, these documents define the principles, risk thresholds, and responsibilities regarding the assumption of credit risk across all business segments.

The credit risk coordination process ensures that exposures are originated, monitored, and managed in accordance with the Bank's strategic objectives and risk appetite, both qualitative and quantitative, as approved by the Board of Directors. Internal rules are periodically updated to ensure alignment with evolving regulatory requirements.

The Bank applies a differentiated approach to credit risk, tailored to the specific characteristics of each portfolio and grounded in internal models, prudent assessment processes, and strong governance principles.

The methodologies used ensure rigorous client creditworthiness assessment, appropriate collateral structuring, and continuous monitoring of exposures, contributing to the maintenance of a balanced and sustainable portfolio.

1. Large Corporate & Corporate Portfolio

- The Bank offers both standard products and customized financing solutions tailored to clients' specific needs.
- Financing conditions vary depending on the debtor's risk profile, including thresholds regarding maximum loan amounts, collateral levels, and pricing structure.
- The internal rating acts as a central tool in eligibility assessment, being used to determine collateral requirements and differentiated pricing.
- ESG assessment is integrated into the credit decision process to ensure long-term sustainability and resilience of the portfolio.

2. SME & Microenterprise Portfolio

- Risk assessment combines qualitative and quantitative factors reflecting the operational specifics of the SME segment.
- The Bank uses internally developed scoring models, statistically validated and calibrated according to turnover, entity type, and client exposure.
- Three separate scoring models are applied: SME, Micro, and Sole Proprietors (PFA), each adapted to the specific profile of the segment.
- For PFA/II/IF clients, the assessment relies primarily on qualitative criteria (transaction history, payment behavior, location, sector of activity).

3. Retail Lending Portfolio

- Clients are classified into risk categories based on scoring models that integrate internal data, information from the Credit Bureau, and socio-demographic variables.
- The scoring reflects the probability of default and is used to determine eligibility and pricing structure.
- Debtors exposed to foreign exchange risk or fixed-rate risk are informed about the potential negative impact of adverse exchange rate or interest rate developments, through explicit scenarios presented during the granting process.

4. Interbank Exposure Portfolio

- The Bank aims to minimize losses and maintain risk-adjusted profitability in its relationships with banking counterparties.
- Exposure limits are set based on the counterparty rating, the risk appetite, and own funds, complying with the maximum concentration threshold of 25% of Tier 1 capital.
- Exposures are monitored daily using automated systems and early-warning indicators to identify risk deterioration.
- Mitigation mechanisms include rating adjustments, limit reviews, and transferring counterparties to enhanced monitoring.

5. Sovereign Exposure Portfolio

- Country exposure limits are established according to the Risk Appetite Framework and external ratings, and approved by the Financial Institutions Credit Committee.
- Exposures are reviewed annually and adjusted based on updated risk assessments.
- No formal limit is applied for Romania, given its strategic importance and compliance with capital and concentration requirements.
- Exposures to foreign entities are monitored only in countries where relevant activity exists, and limits are tracked daily and adjusted through clear procedures in case of breaches.
- External ratings are updated monthly to accurately reflect developments in international markets.

The credit risk management at the level of the BT Group is realized by:

- **Governance framework, policies, and organizational structure:** the Group operates based on a unified internal framework of strategies, policies, and rules, reviewed periodically to ensure alignment with the risk appetite and prudent lending practices. Governance is supported by a dedicated organizational structure, with clearly defined roles and responsibilities for credit risk oversight.
- **Management and monitoring:** the entire credit lifecycle is managed through coherent processes of approval, monitoring, and control, supported by periodic reporting and independent assessments. Regular reviews are conducted to enable early identification of risk elements and the implementation of corrective measures, facilitating the optimization of lending rules, the updating of policies, and the setting of sectoral limits in line with the risk appetite.
- **Internal credit risk models:** internal rating systems are continuously enhanced and subject to periodic reviews, calibrations, and validations, in accordance with model risk governance, as part of each model's lifecycle.
- **Collateral management:** control over collateral quality and coverage is strengthened through diversification, rigorous eligibility and valuation criteria, appropriate protection mechanisms, and periodic independent revaluations, with residual risk monitoring and reporting to management for timely decision-making.

The credit risk appetite is continuously monitored through a set of supporting indicators and strategic limits that reflect both portfolio quality and the evolution of risk over time, while the internal customer rating represents a central element in assessing and tracking this risk, contributing to a prudent and proactive framework for managing exposures.

LIQUIDITY AND FUNDING RISK

The appetite for liquidity and funding risk is continuously monitored through a set of supporting indicators and strategic limits, which reflect the structural correlation of the bank's assets and liabilities, as well as the evolution of risk over time, contributing to stability and ensuring the capacity to meet obligations. The purpose of liquidity risk management is to obtain the expected returns on assets by taking advantage of temporary excess liquidity and through an efficient allocation of the resources attracted from customers, in the context of a proper management, consciously assumed and adapted to the Romanian and international financial-banking market conditions, as well as the general economic context, the current legal framework and the development targets of the BT Financial Group. Liquidity management is realized centrally and aims to combine prudential requirements with profitability requirements.

In liquidity management, Banca Transilvania applies a series of principles regarding the quality, maturity, diversity and degree of the assets and liabilities risks, while establishing carefully monitored sets of limits to ensure the compliance with the principles and also with the set returns (concentration, liquid, eligible assets etc.).

For a sound liquidity risk management, BT is constantly focused on obtaining liquidities via treasury operations, external financing, capital markets, etc., by considering various factors such as the issuer's rating, the issuance maturity and volume of the exposures and the analysis of the markets on which it trades.

The operative (intraday) liquidity management is realized through all the operations carried out by the bank's departments, so as to ensure the performance of all the settlements / payments of the bank carried out by the bank on its behalf or on behalf of its customers, in RON or FCY, on the accounts or in cash, within the internal, legal and mandatory limits.

BT also takes into account a liquidity reserve (buffer), in order to cover the additional liquidity need that may arise over a short period of time, under stress conditions, periodically tested based on different crisis scenarios.

During 2025, the bank recorded very good levels of liquidity indicators thus demonstrating a solid position, registering a more than comfortable liquidity level in a fragile overall economic context.

As well, attention is given to:

- correlation of the growth rate of resources/loans;
- diversification of the range of instruments used and of the IT systems, correlated with the institution's risk appetite;

- monitoring of liquidity coverage ratio (LCR) and the net stable funding ratio (NSFR)
- adequate capital allocation;

OPERATIONAL RISK

Operational risk represents the risk of direct or indirect loss resulting either from the use of inadequate internal processes, internal systems, and human resources, or from their failure to function properly, as well as from external events and actions.

The objective of managing operational risk within the Banca Transilvania Group is to support sustainable and controlled growth of the bank's activity by integrating a solid and adaptable risk management framework. Through a proactive approach to risks, Banca Transilvania aims to support responsible business development while maintaining operational resilience and compliance with applicable regulations.

This framework enables identification, assessment, monitoring, and mitigation of operational risks in line with the assumed risk appetite, thereby contributing to protecting the organization's value, ensuring operational continuity, and achieving strategic objectives.

The key principles of the operational risk management framework are:

- Clear governance and responsibilities – through dedicated structures for operational risk management (committees, risk functions, internal audit) and the application of the “three lines of defense” model, ensuring separation of responsibilities and independence of control functions;
- Risk-oriented organizational culture – by promoting a risk-aware culture at all levels of the organization, continuous training, internal communication, and encouraging proactive incident reporting;
- Identification and assessment of risks (including conduct risk) through process mapping and assessment of associated risks, periodic evaluations, stress scenarios, and the use of RCSA (Risk and Control Self-Assessment) methodologies;
- Formal Product Approval Process, with the involvement of risk and compliance functions;
- Fraud risk management;
- Management of ICT and cybersecurity risks through continuous assessment of risks associated with information technology, including data security, system availability, integrity of digital processes, monitoring of emerging risks, and alignment with applicable regulations;

- Effectiveness of internal controls and mitigation measures through the implementation of preventive, detective, and corrective controls, process automation, workflow standardization, and reduction of data redundancy;
- Ongoing monitoring and reporting;
- Incident management and integration of lessons learned;
- Business continuity and operational resilience through the development and periodic testing of Business Continuity Plans (BCP) and Disaster Recovery Plans (DRP), assessment of risks associated with critical processes, and strengthening the organization's capacity to respond efficiently and in a coordinated manner during crisis situations.

MARKET RISK

The market risk appetite is continuously monitored through a set of support indicators and strategic limits, adapted to the structure and size of the financial instruments portfolios, ensuring the monitoring of risk evolution over time, contributing to maintaining a prudent and proactive risk management framework. In order to reduce the market risk, the bank adopted a prudential approach to protect its profits from fluctuations in prices, interest rates and exchange rates on the market, which all represent exogenous, external, independent factors. The Bank implements a series of principles in terms of quality, maturity, diversity and risk degree of the constitutive elements of the financial instruments portfolios. (bonds, shares, fund units).

Banca Transilvania performs a daily evaluation for financial instruments portfolios, utilizing directly available closing prices, coming from independent sources, such as: prices on the stock exchange, electronic quotations, quotations from several independent, well-known brokers, in accordance with the applicable internal regulations and monitors daily variations, using backup plans, immediately applicable, in case of unstable market conditions.

The market risk analysis is based on the two main risk sub-categories listed below, with the purpose of combining the prudential and profitability requirements:

- **Interest rate and pricing risk:** The management of this type of risk is adapted and permanently adjusted to the Romanian and international financial-banking market conditions and the general economic background. The interest rate risk is monitored daily and tested in crisis simulations performed for the bank's securities portfolio, and the price risk is also monitored daily and tested in crisis simulations related to the portfolios of shares and funds units held by the bank.

- **FX Risk:** It represents the risk of recording losses related to the on-balance sheet and off-balance sheet positions due to unfavorable market fluctuations in the exchange rates. The Bank applies a series of rules with regard to operations/positions sensitive to exchange rate fluctuations, the realization, registration and mark-to-market thereof, as well as the impact of exchange rates on the bank's assets and liabilities.

INTEREST RATE RISK IN THE BANKING BOOK

The interest rate risk appetite is continuously monitored through a set of support indicators and strategic limits, which reflect the maximum accepted level of impact on the economic value of equity and on net interest income, taking into account the business strategy, loss absorption capacity, market conditions and the regulatory framework. The Bank has established a set of strict principles for managing and monitoring this type of risk, which is based on solid governance, comprehensive risk measurement, the use of robust models, EVE and NII analysis, and alignment with risk appetite. The interest rate risk management is to minimize the possible negative impact on the net income, as well as to preserve the economic value of the equity under the conditions of adverse fluctuations of the interest rates.

The bank uses management tools such as economic value of equity and net interest income analysis, stress tests and economic hedge operations, as well as a governance framework and a system of indicators that ensure the maintenance of a prudent and proactive interest rate risk management framework.

A detailed analysis of the liquidity and funding, market and interest rate risks is available in the consolidated financial statements of the BT Group. These were within the risk limits assumed in the bank's decision-making process, promoting an adequate alignment of the assumed risks, available capital and performance targets and at the same time taking into account the tolerance to both financial and non-financial risks.

COUNTERPARTY CREDIT RISK

Counterparty credit risk and settlement risk from exposures arising from derivative financial instruments and from transactions with over-the-counter financial instruments represents the risk of losses that may arise as a result of the counterparty failing to meet its contractual obligations. Banca Transilvania's objective regarding the management of counterparty credit risk is to adopt a prudent policy regarding the selection of counterparties, custodians, the management of operations carried out with counterparties and the maturities of the related operations. The main instrument for managing these risks is the

counterparty limit system implemented for the various types of interbank transactions based on the rating calculated for each counterparty.

REPUTATIONAL RISK

Reputational risk management is carried out by continuously monitoring the internal and external threats in terms of reputation, by considering the best partners (both in terms of customers and suppliers), recruiting and retaining the best employees, minimizing (legal) disputes, implementing rigorous controls on the activities, preventing crisis situations, permanently strengthening the credibility of the BT Financial Group, improving relations with shareholders, creating a more favorable environment for investments and access to the capital, and assuring a continuous and open communication with all stakeholders (shareholders, media, customers, partners, employees, authorities, etc.).

The Bank addresses the reputational risk through an integrated framework that combines prevention, monitoring, rapid reaction and strengthening stakeholder relationships. The main directions include:

- **Promoting an organizational culture based on ethics, transparency and responsibility**, focusing on compliant behaviors and sustainable values, supported by training and awareness programs dedicated to the employees and management;
- Integrating the reputational considerations into decision-making processes, the evaluation of the business initiatives and the approval processes for different products and projects, with the involvement of the relevant structures;
- **Media/ social-media monitoring**, through automated tools and qualitative analyses, for early identification of sensitive issues;
- **Implementing a robust risk management system**, by continuously monitoring the reputational threats, supported by a dynamic and adaptable system of indicators, continuously reviewed, to capture changes in the relevant factors;
- **Periodic assessment of the reputational risk**, with formalized incident reports to the competent structures;
- Maintaining a procedural framework related to the management of the reputational crisis, which requires rapid and efficient reactions;
- **Cultivating trusting relationships with stakeholders**, through proactive communication, financial education, involvement in social responsibility initiatives and the use of dedicated tools, to clarify and update expectations;
- **Ensuring the compliance and internal control**, by applying consistent control systems to align with legal and corporate requirements.

RISK OF EXCESSIVE LEVERAGE

The risk associated with leverage reflects the possibility that excessive use of debt financing may lead to financial vulnerabilities, affecting the institution's ability to absorb shocks, maintain operational stability, and comply with capital and liquidity requirements. This risk is closely linked to the bank's funding strategy, risk appetite, and growth profile.

The framework for managing the risk arising from excessive leverage is built on the following key principles:

- Protection of financial stability: Banca Transilvania controls leverage risk to limit the potential impact of adverse events on capital and earnings.
- Limiting excessive risk-taking: the bank's risk appetite must remain consistent with its financial resources.
- Ensuring a solid and sustainable capital and funding base.
- Healthy and balanced asset financing: a financing structure is maintained that takes into account the risk of excessive leverage.
- Portfolio diversification to avoid dangerous concentration risks.
- Limiting the concentration and volatility of revenue sources.

STRATEGIC RISK

The Strategic risk is the current or future risk for profits and capital to be negatively affected by changes in the business environment, by unfavorable business decisions, improper implementation of decisions or the low adaptability to changes in the business environment. The strategic risk appetite has been established as low based on the following aspects: risk management practices are part of the Group's strategic planning, the exposure to strategic risk reflects strategic goals that are not excessively "aggressive" and are compatible with the developed business strategies, the business initiatives are well designed and supported by communication channels, operating systems and adequate delivery networks for services.

The fundamental principles and strategic objectives in managing strategic risk are:

- Ensuring consistent alignment between the business strategy, the bank's risk appetite, and its operational capacity, so that strategic objectives remain sustainable and compatible with the assumed risk profile;
- Continuously monitoring and assessing macroeconomic, political, technological, and regulatory developments in order to anticipate their impact on the bank's strategic directions;
- Conducting periodic analyses of the risks associated with strategic initiatives;

- Ensuring the active involvement of senior management in the assessment and approval of strategic decisions, supported by internal control functions and the relevant risk committees;
- Using a dedicated set of metrics to monitor deviations from strategic objectives, assess implementation effectiveness, and measure the institution's organizational adaptability.

In order to ensure sound strategic risk management, the BT Group conducts regular reassessments of its business strategy and of the impact of strategic decisions, draws up plans for the introduction of new business lines, products and services, for the expansion of existing services and for the infrastructure consolidation. The Group also performs analysis of the business environment in which it operates in order to identify and highlight the strategic risk factors to which it is exposed, aligning business decisions with institutional capacity, market conditions, and the applicable regulatory framework.

CAPITAL RISK

Capital risk represents the significant risk associated with the credit institution's ability to maintain an adequate level of own funds, ensuring coverage of all risks to which the bank is exposed through its activities, with a potentially material impact on its financial soundness and its ability to comply with prudential requirements.

Risks to capital are distinct risks which, if materialized, may have a significant prudential impact on the credit institution's own funds over the following 12 months. Capital risk is addressed from the perspective of the minimum capital requirements necessary to cover all risks to which the bank is or may be exposed.

The bank's objective regarding capital risk management is to maintain alignment between the strategic targets set through the Business Strategy and the assumed risk appetite, while ensuring financial stability, safeguarding the bank's reputation, and complying with the applicable regulatory framework.

The capital risk management process, namely the internal capital adequacy assessment process, forms an integral part of the bank's governance framework and decision-making culture, being embedded in the overall risk management practices, as capital risk is managed through:

- a) the group-level strategic planning process;
- b) ensuring the continuous effectiveness of the risk appetite framework;
- c) the risk management process and capital management, including forward-looking funding strategies;

- d) the group's recovery plan, by incorporating management actions with material impact;
- e) monitoring capital adequacy indicators to timely identify and assess potential threats;
- f) drawing practical conclusions and undertaking preventive actions.

Capital planning is an essential process for ensuring the resources required for the efficient execution of the bank's operational and investment activities. It is closely linked to shareholder interests and to maintaining an adequate level of own funds in line with European, national, and internal capital requirements to cover the risks associated with the bank's activities. Additionally, in order to ensure an optimal stock of own funds and liabilities capable of absorbing potential losses and covering recapitalization needs—namely to meet the MREL requirement imposed by the NBR as the Resolution Authority—the bank has adjusted its capital and funding planning process by integrating specific actions aimed at accumulating additional capital instruments and eligible liabilities. The means of securing these resources are determined by the competent governing bodies, depending on the most favorable context for the bank and its shareholders at the time of decision.

CAPITAL ADEQUACY

Capital adequacy within Banca Transilvania is ensured through the Internal Capital Adequacy Assessment Process, a structured and integrated framework that forms part of the institution's governance mechanism and decision-making culture. The main objectives of this process are:

- ensuring the capital necessary for conducting activities prudently;
- maintaining own funds at a level at least equal to the capital requirements set by European and national regulations, as well as internal rules, for covering the risks undertaken.

The Internal Capital Adequacy Assessment Process provides an integrated approach to identifying, measuring, aggregating, and monitoring significant risks, as well as determining the internal capital required in relation to the Bank's risk profile. It is embedded in strategic planning, capital management, the assessment of the effectiveness of the risk appetite framework, and the continuous monitoring of capital adequacy indicators, contributing to the early identification of potential vulnerabilities and the timely adoption of appropriate measures.

A key component of this framework, stress testing evaluates capital resilience under adverse scenarios. The results are analyzed in connection with the thresholds established within the Risk Appetite Framework and contribute to strengthening prudent and proactive risk management.

For determining minimum capital requirements, Banca Transilvania and the BT Financial Group use the standardized methods prescribed by regulations:

- Credit risk and counterparty credit risk: the method used for calculating risk-weighted assets is the Standardized Approach;
- Credit Valuation Adjustment (CVA) risk: *the bank applies the Basic Approach*.
- Market risk: for determining the capital requirement related to foreign exchange risk and the trading book, the Standardized Approach is used;
- Operational risk: for calculating the capital requirement for operational risk, the Bank applies the Business Indicator Component (BIC) methodology.

Through the Internal Capital Adequacy Assessment Process, the Bank ensures that it permanently maintains sufficient capital resources to cover the risks undertaken and to support sustainable development, maintaining a solid financial position consistent with the Group's strategic objectives.

BT Financial Group dynamically manages its capital base by monitoring capital rates according to Regulation no. 575/2013, as well as the capital rates disposed following the monitoring and assessment process carried out by the supervisory authority, anticipating the appropriate changes necessary to achieve its objectives, as well as optimizing the structure of assets and equity.

Planning and monitoring take into consideration the total own funds (tier 1, additional tier 1 and tier 2) on the one hand and own funds requirements, respectively risk-weighted exposures (RWA) on the other hand.

In order to ensure that it permanently maintains an adequate level of capital relative to its risk profile and macroeconomic conditions, BT develops a proactive capital planning and adequacy framework, built on four main pillars:

- Compliance with the rules and regulations imposed by national and international authorities in the field;
- Robust internal governance for capital planning and adequacy;
- Use of stress-testing results in determining capital needs; and
- Continuous enhancement of the capital planning and adequacy process.

COMPLIANCE RISK

The BT Financial Group's objective regarding the compliance risk management is to avoid the current or future risk of affecting profits and capital, which may lead to fines, damages and / or termination of contracts or which may damage the Group's reputation as a result of violations or non-compliance with the legal and regulatory framework, agreements, best practices or applicable ethical standards.

The BT Financial Group establishes and operates a formal, continuous, and effective compliance framework designed to ensure full adherence to applicable legal requirements, prudential regulations, and ethical standards, built upon the following key principles:

- Ensuring full compliance with the internal regulatory framework, applicable legal requirements, and the measures, recommendations, and expectations set by the supervisory authority;
- Implementing and maintaining a robust compliance program, based on clear policies and procedures, covering both general compliance and high-risk areas;
- Conducting continuous, proactive, and risk-oriented monitoring of processes, transactions, and client relationships to enable early identification of compliance incidents and prompt reporting to the relevant management structures;
- Developing and maintaining a training and awareness framework tailored to staff responsibilities and activities, ensuring consistent application of compliance requirements;
- Promoting and strengthening an organizational culture grounded in integrity, ethics, and transparency, including the adequate and well-documented management of conflicts of interest.

Continuous monitoring and adherence to the following principles ensure the prerequisites for the correct compliance risk management:

- development and application of the compliance risk assessment methodologies through the use of risk indicators;
- monitoring the compliance and communicating results according to the BT reporting lines;
- analysis of those situations with potential conflict of interest at the bank and subsidiaries level;
- periodic review of the indicators' limit, motivated by the occurrence of new risk events that were not taken into account in the initial assessment;
- formulating proposals of measures leading to the mitigation / elimination of risk events that generated the increase of the indicators level;
- the determination of the likelihood that compliance risk events may occur in the future, based on current information.

INTERNAL AND EXTERNAL AUDIT

The general objectives of the 2025 audit focused mainly on risk management, as well as on the assessment of the overall control system implemented on transactions and / or processes / flows, covering the entire range of risks. The control system assessment was carried out in line with the internal audit methodology, one of the main objectives being that of ensuring the reliability and integrity of financial and operational data, as a result of

an independent and objective evaluation of the internal control system and of the risk management systems in connection with the financial reporting process.

The internal control framework of the BT Financial Group is structured on three levels:

- functions that hold and manage risks (operational units);
- the functions responsible for risk oversight and for creating and maintaining the internal control framework and the independent evaluation of risks (the risk management function and the compliance function)
- the function that provides an independent and objective assessment of the effectiveness and efficiency of risk management, internal controls, and the governance process, namely the internal audit function.

Thus, the 1st control level is realized by the operational units, which are responsible for ensuring an appropriate risk control and prevention environment within each operational structure/activity, as part of their daily operations; the 2nd and 3rd control levels are associated with the three independent control functions, as follows:

- the risk management function ensures the management and control of identified risks by means of specific assessment processes;
- the compliance function ensures the management of compliance risk and the oversight of compliance with the applicable regulations;
- the internal audit function ensures the objective examination of the BT's overall activities, for the purpose of an independent assessment of risk management, of the internal control system, of the management and execution processes, in order to support the achievement of the objectives; it also issues recommendations for the improvement of such activities.

The external auditor, appointed by the General Meeting of Shareholders, independently examines the bank's financial statements to assess whether they are, in essence, accurate, complete, and provide a true and fair view of the institution's financial position and performance. The auditor also verifies compliance with the applicable legal framework and standards governing the financial reporting process. The external auditor of the bank - Deloitte Audit S.R.L. - has audited the individual and consolidated financial statements of the bank as of December 31, 2025.

ESG RISKS (ENVIRONMENTAL, SOCIAL AND GOVERNANCE)

Within the context of intensifying global sustainability concerns, 2025 marks a significant milestone in strengthening the European legislative framework dedicated to ESG risks, with multiple initiatives supplementing the Omnibus legislative packages related to Sustainability & ESG Reporting. The European supervisory authorities and relevant international organizations have launched a series of initiatives aimed at supporting the

green transition, reducing systemic risks and improving consumer protection. Of these, some of the most representative refer to the integration of the ESG risks into the risk management and governance framework, aiming at not only the resilience of the banking sector, but also aligning it with climate neutrality objectives, the banks being encouraged to consider both the impact resulting from their own activities, and that generated by the financed activities. EBA/ GL/2025/01 Guidelines on the ESG risk management provides methodological recommendations on the integration of ESG risks into the credit institutions' risk management framework, highlighting also the necessity to develop prudential transition plans to support efforts towards the transition to Net-Zero. Additionally, specific guidelines for developing crisis scenarios come to complete the necessary actions, calibrating the institution's approaches, with the business specificity and risk appetite.

Regarding the strategic objectives on ESG risks, the Bank applies an integrated framework for their supervision, assessment and mitigation, in line with the international regulations and best practices. Without the enumeration being exhaustive, it implies:

- **Continuously updating the ESG risk management framework**, based on the recommendations of the competent authorities, relevant international organizations and best practices, including initiatives such as conducting GAP analyses to optimize processes, promoting financial education, diversity, inclusion, and improving transparency and risk management mechanisms, while strengthening the principles of business ethics and corporate governance;
- **Monitoring the ESG risk profile through indicators**, operational limits and recurrent reports to the management structures, with escalation principles defined by specific governance;
- Assessing the impact of ESG risks on capital and liquidity;
- Promoting financial inclusion and impact financing, through green, social or sustainable products;
- **Integrating the IFC/ EBRD standards into ESG analysis**, including the compliance with the requirements of the relevant authorities and the use of the exclusion lists;
- **Applying the ESG risk analysis in the lending activity**, by utilizing a Heat-Map application;
- Monitoring the carbon emissions and tracking the reduction of the carbon footprint, both resulting from the Bank's own operations and from the financed activities;
- **Adopting specific sectoral policies pursuing**, where appropriate, a phased exit strategy.

Within the process of aligning with the climate neutrality objectives, the Bank assesses at least annually the ESG factors, their materiality related to the Bank's objectives and specific strategies (e.g. business strategy, risk strategy, sustainability strategy, sectoral strategies, etc.), reassessing the risk appetite. Additionally, based on a differentiated system of indicators (depending on the importance/ relevance/ granularity, etc.) it constantly

monitors the evolution of the portfolio and adjusts the strategies, correlated with the assumed transition plan.

CORPORATE GOVERNANCE TRANSPARENCY AND ACCOUNTABILITY

- General Meeting of Shareholders – Strategic Decisions
- Board of Directors
- Committees Reporting to the Board of Directors
 - Audit Committee
 - Remuneration Committee
 - Nomination Committee
 - Risk Management Committee
- Executive Committees:
 - Leaders' Committee
 - Assets and Liabilities Management Committee
 - Procurement Committee
 - Human Resources Committee
 - Credit Policy and Approval Committees (CPAC – Corporate, CPAC – Retail)
 - Head office Credit and Risk Committees (CCR1, CCR2, level 1 retail credit competence/level 1 retail post-approval services competence, retail credit committee)
 - Committees specific to the activities of the Credit Remediation Department and the Workout, Insolvency and Bankruptcy Department
 - Committee for Monitoring Debt Enforcement and Realization of Assets (CW1, CW2, CRS, CR1, CR2 and CRW)
 - Special Committee for Approval of Legal Enforcement / Litigation (CMESVA)
 - Financial Institutions Credit Committee (CAES)
 - Branch Credit & Risk Committee (CCIF)
 - Factoring Committee (CCRS)
 - Data Management Steering Committee
 - Operational Risk Committee
 - ESG Committee
- BT Group Diversity and Equal Opportunities Policy
- Human Rights Principles
- Policies for the Prevention of Corruption and Bribery
- Policy against Anti-Money Laundering
- Remuneration policy (applicable to identified personnel)

Corporate Governance represents a strategic role in strengthening Banca Transilvania's performance. By establishing a clear direction, it contributes to achieving the company's objectives, adequate risk management, and responsible resource allocation.

As an issuer on the capital market, Banca Transilvania is committed to comply with the Bucharest Stock Exchange Corporate Governance Code, applying the principles and requirements set forth therein. Both [previous version](#) of the Code and the [updated edition](#), which came into force on January 1st, 2025, can be consulted on the BSE's website. The first year of reporting compliance with the new Corporate Governance Code of the Bucharest Stock Exchange is 2026, for the 2025 financial year. In this regard, Banca Transilvania makes every effort to continuously verify that its shareholders comply with the legal and regulatory requirements regarding their financial integrity and solidity, as well as those relating to the influence they may exert on the management of the bank, no aspects being identified that may contravene these requirements.

GENERAL MEETING OF SHAREHOLDERS – STRATEGIC DECISIONS

The General Meeting of Shareholders (GMS) is the supreme decision-making body of Banca Transilvania that ensures the strategic management of the Bank, with the responsibility of setting strategic organizational objectives and allocation of resources necessary to achieve them.

The decisions of the General Meeting of Shareholders adopted in accordance with the applicable law and the provisions of the [Bank's Articles of Association](#) are mandatory for all the shareholders, including for the ones that have not taken part in the Meetings.

Each shareholder has the right to participate in the General Meetings, either in person or through a representative (BT shareholder or not), based on a special letter of attorney, in accordance with the applicable law. In compliance with the provisions laid down in the Articles of Association, the power of attorney must be submitted or sent to Banca Transilvania five (5) days prior to the date of the meeting (GMS). Legal entities are represented in the General Meetings by their legal representatives or other authorized persons in accordance with their statutory documents.

The General Meetings may be Ordinary or Extraordinary and shall be convened by the Board of Directors, in accordance with the law. They shall be held at the headquarters of the Bank or at another location, indicated in time through the convening notice.

The convening notice shall be published in the Official Gazette, in a newspaper with national coverage, and in a widely circulated newspaper in the city where the company's headquarters are located. The notice shall contain information about the place and date of

the Meeting, as well as the agenda and the meeting date shall not be held earlier than thirty (30) days as of the convening date.

The Ordinary General Meetings shall be held at least once a year, within a maximum of four (4) months after the end of the financial year. In addition to discussing other issues on the agenda, the general meeting is required to:

- discuss, approve or amend the annual financial statements, based on the reports submitted by the Board of Directors, or, as applicable, the financial auditor, and set the dividend;
- elect and revoke the members of the Board of Directors;
- appoint and set the minimum duration of the financial audit agreement, as well as to revoke the financial auditor;
- establish the remuneration of the Board members for the current financial year, unless it has not been established through the Articles of Association;
- decide on the management of the Board of Directors;
- establish the Revenue and Expenditure Budget and the Activity Plan for the following financial year;
- decide on the pledge, lending or dissolution of one or several units of the company.

With regard to the repurchase of its own shares, the Board of Directors can initiate the repurchase procedure only subject to the decision of the Extraordinary General Meeting of Shareholders, under the conditions governed by Law No. 31/1990 on Companies, as well as by the capital market legislation. For the validation of the decisions of the Ordinary General Meetings, the presence of shareholders representing at least thirty-five percent (35%) of the share capital is required. The decisions shall be taken with the majority of the votes expressed. On the date set for the second convening, the Meeting is validly constituted regardless of the quorum (irrespective of the percentage of share capital represented by the attending shareholders) and the decisions shall be taken with the majority of the votes of those present.

Members of the Board of Directors may not vote at the Ordinary General Meetings, either in person or by a power of attorney, in respect of the discharge of their management or on any other issue relating to their person or activity.

In order for the Extraordinary General Meeting to be validly convened, the presence of the shareholders representing at least thirty-five percent (35%) of the share capital is required, whereby the decisions are to be made with the majority of votes held by the present or represented shareholders (in accordance with Article 115(2) of Law No. 31/1990). If, upon the first convening, the above quorum is not met, a second meeting shall be held where the presence of the shareholders representing at least one-fifth of the share capital is required and the decisions on the issues included in the agenda of the previous

Extraordinary General Meeting shall be adopted by a majority of votes held by the attending or represented shareholders (under Article 115 (2) of Law no.31/1990 on Companies).

The Board of Directors must convene the Ordinary or Extraordinary General Meeting upon the request of the shareholders representing at least five percent (5%) of the share capital, which request must be submitted in writing and justified. In the event of non-compliance, the competent court at BT's headquarters may authorize the convening of the meeting, by appointing a person from among the shareholders to chair the meeting.

The decisions of the General Meeting shall be taken by open vote. Secret voting is mandatory for the election or the removal of any Board of Director members as well as for decisions regarding the liability of members of the administrative, management, and control bodies of Banca Transilvania.

The General Meetings of Shareholders are chaired by the Chairman of the Board of Directors or by a representative appointed by the Chairman from among the members of the Board of Director. One to three secretaries from the attendees are also elected to verify the attendance, indicating the share capital represented by each shareholder attending or represented, to verify the minutes prepared by the technical secretary regarding the number of shares represented at the Meeting and compliance with all formalities required by the applicable law and the Articles of Association.

Banca Transilvania's shareholders have all the rights conferred by the applicable law and the Articles of Association of BT, including the provisions of Law no. 31/1990 on Companies, the banking and capital market legislation, within the limits set by the legal framework and the Articles of Association.

Such rights include without limitation:

- The right to be informed on the General Meeting of Shareholders - granted to every shareholder. This implies access to the annual financial statements, Board of Directors/auditor/censor reports;
- The right to address written questions prior to the General Meeting of Shareholders;
- The right to ongoing information - granted to all shareholders. This implies access to the Register of GMS Decisions, as well as to the company's Articles of Association, within the limits of the law;
- The right to vote of any shareholder who holds shares based on the principle of one share - one vote;
- The right to dividends if the legal requirements are met;
- The right to request the annulment of the decisions of the General Meeting of Shareholders- granted to the shareholders who voted against or abstained at the GMS, within the limits established by law;

- The right to convene the GMS – for shareholders holding at least five percent (5%) of the share capital;
- The right to add new topics on the GMS agenda - for shareholders holding at least five percent (5%) of the share capital;
- The right to report censurable acts - applicable only upon the request of a shareholder holding at least five percent (5%) of the share capital, in which case the auditors are required to conduct the appropriate investigation.

Additional details regarding the General Meeting of Shareholders, as well as the shareholders' rights are available in Banca Transilvania's Articles of Association, which can be accessed on the Bank's website, under the Investor Relations section, in the Corporate Governance category – General Information. Details regarding the procedure for holding the GMS are available in the Convening Notice, on BT's website, under the Investor Relations section, in the GMS category.

During 2025, Banca Transilvania held two General Shareholders' Meetings, in April and October. All decisions adopted, supporting materials, related reports, and related documentation were published in the GMS section of the Investor Relations page mentioned above, ensuring full transparency and easy access for all shareholders.

In addition to the formal governance process, the Bank maintained a continuous and constructive dialogue throughout the year, through specific channels, with shareholders, institutional investors, and voting service providers that support investors in exercising their voting rights, complying with governance standards, and integrating ESG considerations into their decision-making processes. Interactions included both regular exchanges of information and specific clarifications regarding the Bank's policies, regulatory developments, and issues relevant to corporate responsibility.

Furthermore, the bank reaffirms its commitment to continuously strengthen its relationship with shareholders and investors, including by expanding communication channels, improving access to non-financial information, and further integrating ESG principles into its reporting, dialogue, and corporate strategy activities.

BOARD OF DIRECTORS

The management structure of Banca Transilvania includes the supervisory body, the Board of Directors and the top management, the Leaders' Committee.

The top management of the bank is provided by individuals appointed to exercise the operational management of the credit institution, who are accountable to the management body for the performance of their duties. Their mandates are exercised in accordance with

the provisions of the management contracts, the applicable regulations of the National Bank of Romania, the provisions of Law No. 31/1990 on Companies, as well as the bank's internal regulatory framework.

The management of Banca Transilvania is exercised by a Board of Directors appointed by the General Meeting of Shareholders for terms of four (4) years. The Board consists of seven (7) directors, elected by the shareholders at the General Meeting of Shareholders, either upon expiry of their term of office or on an exceptional basis, in the event of one or more vacancies. In accordance with the specific regulations issued by the NBR, the Board of Directors is the body responsible for strategic guidance, coordination, supervision, and control of the bank's activities, with the responsibility of ensuring prudent, efficient, and compliant management within the applicable regulatory framework.

Within Banca Transilvania, the Board of Directors has the following structure:

- Chairman of the Board of Directors;
- Vice-Chairman of the Board of Directors;
- five (5) directors - members of the Board of Directors;

The eligibility criteria for the appointment of the Board of Directors are those set out in the applicable specific legislation, namely Law no. 31/1990 on Companies, Government Emergency Ordinance no. 99/2006 on credit institutions and the relevant regulations of the NBR, as well as those set out in the Articles of Association of Banca Transilvania.

After the approval of the nomination by the shareholders at the GSM, but before the actual takeover of the mandate, each new member of the Board of Directors must obtain prior approval from the National Bank of Romania, in accordance with the "fit & proper" assessment requirements applicable to credit institutions.

The members of the Board of Directors are not involved in the Bank's operational activities, as these responsibilities fall exclusively to the Leaders' Committee. The role of the Board is one of supervision and strategic guidance, in accordance with corporate governance standards and NBR regulations.

Responsibilities of the Board of Directors:

- To monitor the implementation of the strategy and the objectives set out in the policy statement adopted by the General Meeting of Shareholders, as well as of the medium-term Strategic Plan, to approve and review the general strategies and policies relating to the bank's activity at least once a year;
- To adopt the Activity Plan and the Revenue and Expenditure Budget, the Investment Program and the Profit and Loss Account, as well as to prepare the Report regarding the bank's activity, which are all submitted for approval to the General Meeting of

Shareholders and to prepare the proposals for the distribution of the net profit, submitted for approval to the General Meeting of Shareholders;

- To approve and implement a Strategic Plan for a minimum period of two (2) years which is to be reviewed at least annually;
- To approve the Rules of Organization and Administration, the [Code of Ethics and Conduct](#), the organizational structure, as well as the principles for staff remuneration and retention, and to approve sound strategies and policies for establishing new structures and individual exposures towards persons in special relations with the bank;
- To supervise the management of the compliance risk;
- To create the necessary conditions for an independent, permanent and efficient compliance function;
- To approve the annual Compliance Program of the Bank and its subsidiaries, as well as the selection and suitability assessment processes for persons holding key positions;
- To oversee the reporting and communication processes with the National Bank of Romania;
- Ongoing assessment of the capital adequacy in relation to risks, ensuring that capital allocations are in line with the risks assumed both for the credit institution and for its subsidiaries;
- To approve the recording of losses and major expenses for fixed assets and leasing, within the limits of the powers established by the Bank's internal regulations;
- To approve the contingency, business continuity, and recovery plans, in accordance with the applicable regulations;
- To approve the accounting policies, the financial control system policies, as well as the significant risk management policies;
- To approve other significant exposures and operations of the Bank, including exposures to affiliated parties and shareholders with significant holdings, setting credit-related limits, initiating enforcement proceedings, approving loans and borrowings granted above the established limits, approving operational budgets, major or related-party transactions, debt and financing with significant impact, as well as approving remuneration policies, measures regarding participations, acquisitions, outsourcing, internal regulations and risk limits in accordance with internal regulations and the powers established by the Board of Directors;
- To approve other internal policies and rules, in accordance with the Bank's Rules of Organization and Administration.

The Board of Directors meets, as a rule, quarterly and whenever necessary, including when operational or regulatory circumstances require, the meetings being validly constituted in the presence of at least half of its members. The Board may also exercise its specific powers through specialized committees set up at its level, consisting of three–four (3-4) members and operating on the basis of the mandates received and in accordance with the

legal requirements applicable to each forum. The committees established at the level of the Board of Directors are: the Audit Committee, the Remuneration Committee, the Nomination Committee, and the Risk Management Committee. These support the Board in exercising its supervisory role through specialized analysis, independent evaluation, and the drafting of recommendations in their areas of expertise. The activity of the Board of Directors and its committees are governed by terms of reference and procedural rules aligned with corporate governance principles, which are published on the BT website.

In 2025, the Board of Directors met in person seven (7) times. In determining the attendance rate at the meetings presented below, both physical presence and objectively justified absences were taken into account, in accordance with the bank's practices.

The structure of Banca Transilvania's Board of Directors and the professional expertise of its members as of December 31, 2025, is as follows:

MEMBER	POSITION	PERSONAL DATA
HORIA CIORCILĂ		
Date of first election: April 2002	Chairman	Technical University of Cluj-Napoca, The Faculty of Automatic Control and Computers. The CV including information about other current positions held is available here .
Duration of the current mandate: April 2022- April 2026		
Non-executive director		
BoD attendance in 2025: seven (7) out of seven (7) meetings		
THOMAS GRASSE		
Date of first election: April 2014	Vice-Chairman	Bankakademie Frankfurt-Business School of Finance and Management. The CV including information about other current positions held is available here .
Duration of the current mandate: April 2022- April 2026		
Independent non-executive director		
BoD attendance in 2025: seven (7) out of seven (7) meetings		

IVO GUEORGUIEV

Date of first election:
April 2014

Duration of the current
mandate: April 2022- April 2026

Member

MBA, Alberta University, Edmonton,
Canada. The CV including information
about other current positions held is
available [here](#).

Independent non-executive
director

BoD attendance in 2025: seven
(7) out of seven (7) meetings

VASILE PUȘCAȘ

Date of first election:
April 2012

Duration of the current
mandate: April 2022- April 2026

Member

Babeș- Bolyai University, Cluj-Napoca,
Faculty of History and Philosophy PhD in
History. The CV including information
about other current positions held is
available [here](#).

Independent non-executive
director

BoD attendance in 2025: seven
(7) out of seven (7) meetings

MIRELA BORDEA

Date of first election:
April 2017

Duration of the current
mandate: April 2022- April 2026

Member

Bucharest University of Economic
Studies, External Trade Department. The
CV including information about other
current positions held is available [here](#).

Independent non-executive
director

BoD attendance in 2025: seven
(7) out of seven (7) meetings

**LUCYNA STANCZAK
WUCZYNSKA**

Date of first election:
April 2022,

Duration of the current mandate:
April 2022- April 2026

Member

Postgraduate Studies – Advanced European Studies at the College of Europe, Bruges, Belgium, Economics and European Integration. CV, including information on current positions held in other company [here](#).

Independent non-executive director

BoD attendance in 2025: seven (7) out of seven (7) meetings

**FLORIN PREDESCU
VASVARI**

Date of first election:
April 2022

Duration of the current mandate:
April 2022- April 2026

Member

PhD in Accounting, Rotman School of Management, University of Toronto, Canada (Specialization in Finance and Econometrics). CV, including information about current positions held in other companies [here](#).

Independent non-executive director

BoD attendance in 2025: seven (7) out of seven (7) meetings

COMMITTEES REPORTING TO THE BOARD OF DIRECTORS

Audit Committee

Mr. Ivo Gueorguiev – Chairman, Mr. Thomas Grasse – Member; Mrs. Mirela Bordea – Member

Remuneration Committee

Mr. Vasile Pușcaș – Chairman; Mr. Horia Ciorcilă – Member; Mr. Ivo Gueorguiev – Member

Nomination Committee

Mr. Florin Predescu Vasvari – Chairman; Mr. Horia Ciorcilă – Member; Mr. Ivo Gueorguiev – Member

Risk Management Committee

Mr. Thomas Grasse - Chairman, Mr. Ivo Gueorguiev - Member; Mr. Florin Predescu Vasvari – Member; Mrs. Lucyna Stanczak-Wuczynska – Member.

The Secretary of the Board of Directors, as well as of the Board Committees is ensured by a secretary, i.e. Mrs. Ioana Olănescu, Senior Executive Director, Corporate Governance and Non-Credit Legal Affairs..

The Board of Directors currently comprises six (6) independent directors and consists entirely of non-executive directors.

In 2025, the Nomination Committee conducted the annual assessment of the suitability of the Board of Directors and its committees, in accordance with applicable regulations and the bank's internal policies. The assessment covered both the collective and individual composition of the Board members, analyzing their skills, professional experience, diversity, reputation, time allocated to the position, and independence of thought. As a result of this process, no weaknesses or significant issues were identified that would affect the proper functioning of the Board or its committees.

Banca Transilvania applies a formalized framework for assessing the suitability of the management body, in accordance with the regulations of the National Bank of Romania and the European requirements for the governance of banking institutions. The policy on assessing the adequacy of the management body can be accessed on the BT website, in the Investor Relations section, under [Corporate Governance, Declaration of Compliance](#) being accessible to all interested parties. The same section also includes detailed information on the [Remuneration Policy regarding the Bank`s Management Body](#), reflecting principles of prudence, proportionality, and alignment with the institution's strategic objectives. Together, these instruments, the periodic assessment of suitability, governance policies, and remuneration policies contribute to maintaining a solid, transparent management framework in line with best practices in the financial market, strengthening the balance between strategic oversight and operational management of the bank.

AUDIT COMMITTEE

Purpose, responsibilities and principal duties

The Audit Committee within the Board of Directors carries out its activities based on the applicable legal framework: Law No. 31/1990 on Companies, Law No. 162/2017 on the statutory audit of annual financial statements and consolidated annual financial statements and on the amendment of certain legislative provisions, NBR Regulation No. 5/2013 on prudential requirements for credit institutions and the Rules of Organization and

Administration of Banca Transilvania. The number of members and the powers of the Committee are approved by the Board of Directors.

The Audit Committee is responsible for overseeing the performance of the external auditors and providing recommendations regarding their appointment, renewal of mandate, and remuneration. It also evaluates the functioning of the internal audit system, developed under the responsibility of the Internal Audit Division's management, which reports directly to the Board of Directors on this system. The Committee may issue recommendations to the Board of Directors regarding the effectiveness of the internal audit department's performance, as well as regarding the establishment and review of the remuneration of the head of this Division, in accordance with independence and objectivity requirements set out in the applicable regulations.

The committee members meet periodically with the Bank's external auditor to analyze matters arising during audit missions, as well as the responses provided by the Bank's executive management to those findings. During these meetings, the Committee also assesses the degree of objectivity and independence of the opinions expressed by the external auditors. The Committee monitors compliance with Romanian legal and regulatory requirements regarding the preparation, presentation, and audit of financial statements, including compliance with IFRS standards and regulations issued by the National Bank of Romania. In this context, the Committee reviews the external auditor's report on the IFRS financial statements and reviews and preapproves the Bank's IFRS financial statements prior to their submission to the Bank's Board of Directors. The full list of responsibilities delegated to the Committee is detailed in the Audit Committee Regulation, published on the bank's website.

Audit Committee Report for 2025

The Audit Committee consisting of three (3) independent non-executive members, held seven (7) physical meetings in 2025, in addition to holding a series of conference calls and in absentia meetings to review, discuss and approve specific topics. The attendance rate of the meetings presented below was determined by taking into account both physical attendance and absences that were objectively justified, in accordance with the bank's practices.

Structure of the Committee in 2025:

- **Mr. Ivo Gueorguiev** – Chairman of the Audit Committee; Independent non-executive director with extensive audit experience, attending seven (7) out of seven (7) meetings;
- **Mr. Thomas Grasse** – Member; Independent non-executive director with extensive audit experience, attending seven (7) out of seven (7) meetings;
- **Mrs. Mirela Bordea** – Member; Independent non-executive director with extensive audit experience, attending seven (7) out of seven (7) meetings.

During the meetings held in 2025, the Audit Committee addressed the following:

- Analyzed the financial statements and the report prepared by the external auditor for 2024, focusing on the significant accounting and reporting aspects and their impact on the financial statements;
- Monitored the effectiveness of the internal control, internal audit and risk management by analyzing specific reports prepared by the Bank's control functions and other relevant reports;
- Analyzed specific aspects of the NBR's reports and monitored the implementation of the related recommendations;
- Monitored the implementation of significant recommendations in the external auditor's letter to management;
- Established an annual audit plan for internal audit, together with the internal auditor;
- Oversaw the preparation of sustainability reports and the information included therein, to the extent that this task is not assigned to another committee.

The Audit Committee carried out an intensive supervisory activity, working closely both with the Bank's external auditor and the Deputy Chief Financial Officer (CFO) on matters related to the Bank's financial results, which were audited and reviewed by the financial auditor. Based on the analyses performed, the Committee issued recommendations to the Board of Directors regarding their approval.

Throughout the year, dedicated meetings were held for audit planning and reporting, attended by the external auditor, including sessions conducted in the absence of the management team, in line with best practices on independence and objectivity. The Committee also reviewed updated information provided by the external auditor and by the Bank's management regarding changes in Romanian legislation affecting credit institutions, with a particular focus on current and upcoming developments in IFRS financial reporting standards.

The Committee examined the effectiveness of the Bank's internal controls, working closely with both the external and internal auditors to closely monitor any identified deficiencies and to track the progress of remediation actions through ongoing analytical follow-up. In addition, the Audit Committee was briefed on the results of external inspections carried out by regulatory authorities.

The Committee oversees the conduct of the statutory audit and is responsible for assessing and monitoring the independence and objectivity of the external auditor, as well as for reviewing the quality of the delivered audit reports. In this context, the Committee ensures that the relationship with the external auditor complies with applicable professional and regulatory standards.

In 2023, the Audit Committee coordinated the selection process for the external auditor of Banca Transilvania for the audit of the financial statements for the 2023–2027 financial years, prepared in accordance with the International Financial Reporting Standards, pursuant to NBR Order no. 27/2010. The external auditor — Deloitte Audit SRL — was subsequently appointed by the Ordinary General Meeting of Shareholders of Banca Transilvania on 26 April 2023, based on the independence statement submitted to the Audit Committee and on the Committee’s own assessment of the auditor’s competence, objectivity, and ability to fulfil the mandate. Following its analysis, the Committee concluded that the external auditor is independent in providing audit services to Banca Transilvania and that it may also perform certain non-audit services within the limits set by the applicable regulatory framework.

During 2025, the Audit Committee did not identify any situations, risks, or elements that could question the independence of the external auditor or affect the integrity of the audit process conducted for Banca Transilvania.

REMUNERATION COMMITTEE

Purpose, responsibilities and principal duties

The Remuneration Committee operates as an advisory committee subordinated to the Board of Directors, established to provide independent opinions on remuneration policies and practices. The Committee assesses the extent to which the remuneration structure supports the prudent management of Banca Transilvania’s risk, capital, and liquidity, and evaluates whether the incentives offered to staff are aligned with the institution’s strategic objectives and risk profile. The Committee also exercises the responsibilities delegated by the Board of Directors in this area of activity.

The composition of the Remuneration Committee is as follows:

- The Chairman of the Board of Directors;
- Up to two (2) Board of Directors members.

This Committee reviews and ensures that the general principles, as well as remuneration and benefits policies are aligned with the Banca Transilvania’s business strategy, long-term organizational values and objectives. The Remuneration Committee meets at least twice a year or whenever necessary, upon the request of one of its members or of the bank’s management.

Remuneration Committee’s Report 2025

As of December 31, 2025, the Remuneration Committee is composed of:

- Mr. Horia Ciorcilă
- Mr. Ivo Gueorguiev

- Mr. Vasile Pușcaș

The percentage of independent members is 66.66%.

In 2025, the Remuneration Committee met (in person or via electronic means) nine (9) times with all members in attendance. The attendance record of the meetings presented below has considered both the physical participation and the objectively justified absences, in accordance with the Bank's internal practices. The Chairman of the Risk Committee was invited to the meetings to make sure that the remuneration practices are in line with the Bank's risk management requirements.

During the meetings held throughout 2025, the Remuneration Committee accomplished the following:

- The committee analyzed and made sure that the general remuneration and incentive principles and policies for staff are in line with the long-term business strategy, values and objectives of the BT Financial Group. In this regard: it analyzed and approved the Staff Remuneration Policy applicable at BTFG level, approved the Staff Remuneration Norm applicable at BTFG level, analyzed the general principles of the Remuneration Policy, and informed the Board of Directors on how to implement them, ensuring the completion of an independent internal assessment at a centralized level of compliance with the applicable Policy;
- The committee monitored the fulfilment of the following legal requirements:
 - the involvement of the internal control functions (audit, risk and compliance) as well as of the Human Resources Department in the development of the remuneration policy;
 - ensuring that the Bank staff has access to the remuneration policy, and that the performance evaluation process is properly and transparently formalized for employees;
 - promoting a Remuneration Policy that ensures sound and efficient risk management;
 - the alignment of the remuneration policy with the long-term business strategy, objectives, values and interests of the bank, including the implementation of measures to prevent conflicts of interests.
 - the assessment of the mechanisms and systems implemented in order to ensure that the remuneration system takes into account all types of risks, liquidity and capital levels and that the overall remuneration policy is in line with the Bank's strategy and promotes sound and efficient risk management being aligned with the institution's long-term business strategy, objectives, culture and corporate values and the long term interests.
- The Committee approved the total annual remuneration levels for the members of the Leaders' Committee and BT's executive directors (fixed and variable remuneration), based on the achievement of SMART objectives, as well as the

remuneration of BT staff and the management of BT subsidiaries, in accordance with its competences and based on the performance evaluation process conducted;

- The Committee directly supervised the remuneration levels of the coordinators of the risk management, compliance and audit functions (Manager and Deputy Managers of the Risk Management, Internal Audit and Compliance Division) and adopted decisions on the remuneration associated with internal control functions, taking into account the requirements for maintaining an adequate framework for risk management and ensuring compliance
- The Committee approved the 2025 Stock Option Plan Programme;
- The Committee supervised the process of drafting, internal approval and submission for approval of the Extraordinary General Meeting of Shareholders of the Remuneration Policy applicable to the Bank's management body;
- The Committee approved the 2024 Remuneration Report, prepared in accordance with regulatory requirements, as well as the Gender Pay Gap Report, prepared in accordance with the reporting requirements of the National Bank of Romania.

NOMINATION COMMITTEE

Purpose, responsibilities and principal duties

The Nomination Committee operates as an advisory committee subordinated to the Board of Directors, with the role of providing independent opinions on nomination policies and to exercise the responsibilities delegated by the Board of Directors in this area of activity.

The Nomination Committee consists of:

- The Chairman of the Board of Directors;
- Up to two (2) Board of Directors members.

This committee reviews and ensures that the general principles and the policies regarding the suitability and nomination of members of the management bodies are aligned with the rules set by the Board of Directors, as well as with Banca Transilvania's business strategy, values, and long-term objectives. The Nomination Committee meets at least twice a year or whenever necessary, at the request of one of its members or of the Bank's senior management.

Nomination Committee's Report for 2025

As of December 31, 2025, the Nomination Committee is composed of:

- Mr. Horia Ciorcilă
- Mr. Ivo Gueorguiev
- Mr. Florin Predescu Vasvari

The percentage of independent members is 66.66%.

In 2025, the Nomination Committee met (physically or via electronic means) eleven (11) times with all members in attendance. The attendance record of the meetings presented above has considered both the physical participation and the objectively justified absences, in accordance with the Bank's internal practices.

During the meetings held throughout 2025, the Nomination Committee carried out a series of essential activities aimed at ensuring a solid governance framework and a rigorous suitability and nomination process at the level of Banca Transilvania's management body, as follows:

- The Committee reviewed and made sure that the general principles and nomination policies for staff are aligned with the long-term business strategy, values and objectives of the Banca Transilvania. In this regard, the committee:
 - identified and recommended to the Board of Directors the extension of the mandates of the management body members whose mandates were approaching their end (including in terms of the new durations of their mandates),
 - assessed the balance of knowledge, skills, diversity and experience within the management body to ensure an adequate composition and complementarity;
 - assessed the structure, size, composition and performance of the management body making recommendations to the management body on any necessary adjustments;
 - assessed the knowledge, skills and experience of each member of the management, reporting the results to both the competent bodies and to the supervisory authority. As part of the individual suitability assessment, the Committee also included the evaluation of knowledge related to sound ESG (Environmental, Social and Corporate Governance) principles and practices; monitored and analyzed the selection and succession planning processes for key function holders and members of the management body, and approved appointments and mandate extensions within BT and its subsidiaries, in accordance with internal suitability and nomination policies and procedures;
 - reviewed the results of the professional training program, carried out based on the program approved by the Committee, with a view to assessing the suitability of senior management successors for 2026;
 - reviewed and approved the lists of identified staff at BT and its subsidiaries, updated on a semi-annual basis;
 - ensured that the Bank's Diversity Policy applicable to the management body was updated by including quantitative objectives for the under-represented gender and by strengthening the internal regulatory framework and principles governing the appointment process of members of the Bank's management body;

- monitored the annual review of the Policy on selection, monitoring, evaluation, and succession planning within BT as well as the Equal Opportunities Policy, in accordance with the applicable provisions

RISK MANAGEMENT COMMITTEE

Purpose, responsibilities and principal duties

The Risk Management Committee is a governing body subordinated to the Board of Directors. It operates independently from the executive management in order to fulfil its duties towards stakeholders.

The Committee's responsibility is to support the Board of Directors in its oversight of the Group's risk management framework and establish a universal Group risk appetite structure. It is entrusted to oversee and monitor the alignment of the overall risk framework to the Group's business strategy, while fostering a robust culture of prudent risk decision-making.

Its oversight duties include:

- a robust assessment of principal and emerging risks faced by the Group, with emphasis on those that could threaten capital adequacy and solvency, the business model and financial performance,
- ensuring oversight of the Bank and its subsidiaries, enterprise-wide risk management framework, risk appetite and risk tolerance as appropriate for the Group's business activities,
- monitoring the risk management framework alignment with the Group's growth strategy, supporting a prudent risk culture and facilitating a well-reasoned consensus with executive management regarding the Group's strategic risk positions.
- the Group's non-financial risks, including people, conduct, Sustainability risks, cyber and information security and reputational risk.

The purpose of the Committee is to assist the Board of Directors in fulfilling its governance and supervisory responsibilities related to risk.

The number of members and their competences are determined by the Board of Directors. The full list of the Committee's responsibilities is available in the Rules of Operation of the [Risk Committee](#), published on the bank's website.

Risk Management Committee's Report for 2025

Over the past year, the Committee continued its proactive supervisory approach and focused its activities on risk management priorities arising from the Bank's and the Group's strategy and the prevailing business and operating environment.

The Committee maintained a strong focus on the Group's operational resilience and received regular updates from the Deputy Chief Executive Officer in charge of risk management.

The Committee's initiatives in 2025 continued to remain committed to maintaining best practices in risk management to ensure protection of the Bank's core, while enabling Group's business growth.

During the year, the Committee focused its oversight on the Bank's first time participation in the 2025 EU-wide stress test conducted by the European Banking Authority in cooperation with the National Bank of Romania, the European Central Bank and the European Systemic Risk Board. The 2025 exercise included a sample of 64 banks representing about 75% of the total assets of EU banks.

Banks were tested against a baseline scenario and a hypothetical adverse scenario that assumes a severe but plausible economic shock. Banca Transilvania Group stress test results confirmed the solidity of the Group and its resilience under the adverse scenario.

Another Committee focus point was the implementation of the Digital Operational Resilience Act (DORA) in the Bank and scoped subsidiaries.

The committee consists of four (4) independent non-executive members of the Board of Directors. The Group considers that all the members of the Risk Management Committee of Banca Transilvania continue to demonstrate a fully independent judgement in all aspects related to their functions.

The Committee held five (5) physical meetings in 2025 and three meetings by correspondence. The Committee reports, including its findings and recommendations, are regularly submitted to the Board of Directors in each of its meetings by the Chairman of the Risk Management Committee.

In 2025, Risk Management Committee consisted of:

- **Mr. Thomas Grasse:** Chairman; Independent non-executive director with extensive risk management experience, attending five (5) out of five (5) meetings;
- **Mr. Ivo Gueorguiev:** member; Independent non-executive director with extensive risk management experience, attending five (5) out of five (5) meetings;
- **Mrs. Lucyna Stanczak-Wuczynska :** Independent non-executive director with extensive risk management experience, attending five (5) out of five (5) meetings;
- **Mr. Florin Predescu Vasvari:** member; Independent non-executive director with extensive risk management experience, attending five (5) out of five (5) meetings.

As in previous years, the Risk Management Committee focused on periodically recurring topics such as the annual Group risk appetite statement, resolution and recovery, as well as the internal processes to ensure capital adequacy and an appropriate liquidity position, based on the financial plan, to ensure that the Bank holds sufficient capital to stay within risk appetite limits and regulatory requirements. The Committee also prioritised the enhancement of scoped Subsidiaries Risk Management frameworks to ensure Group-wide harmonisation and resilience.

In addition, the Committee discussed the development and monitored progress of the Bank's key transformation initiatives in connection with the Risk function. Particular focal points in this context were the further development of the Group's operating model in the Risk function and the execution of CRO strategic priorities 2024-28.

The Committee focused on a range of other regulatory priorities, including the Supervisory Review and Evaluation Process (SREP) results, internal capital and liquidity allocation updates, regulatory capital adequacy and minimum requirement for own funds and eligible liabilities reports and examined various stress tests and their results.

The following section provides detail on how the Committee discharged its responsibilities within an ongoing complex environment during 2025 alongside principal activities and priorities:

- it reviewed and recommended Board approval for the new Risk Appetite Framework and the Operational Risk management framework;
- it reviewed and assessed the robustness, adequacy and efficiency of the risk management system in Banca Transilvania and BT Group, focusing on the risk management strategies and policies, based on the reports prepared by the functions in charge of the bank's risk management;
- it examined the 2025 risk management strategy and ICT&SecIT Risk Strategy, as proposed by the Leaders' Committee;
- it analyzed the risk management reports for exposures to various risk types and, as part of its risk oversight, assessed the Bank's capital adequacy against the business plan to ensure sufficient capital buffers were maintained within risk appetite limits and prudential requirements;
- other topics of reporting and discussion were non-financial risks including IT security, cybersecurity, financial crime and related risk mitigation strategies and initiatives;
- it closely monitored the Group's credit portfolio, receiving regular updates on the overall asset quality, non-performing loans and cost of risk;
- the Committee oversaw the Bank's recovery planning process and recommended Board approval for its submission to the National Bank of Romania;
- considering uncertainties from continued adverse macroeconomic effects given high energy and other commodity prices, sustained inflationary pressure, elevated

interest rates and geopolitical risks, the Committee focused on reviewing model risk management assumptions, back testing and model validation results and discussed post model adjustments for estimate of collective impairment allowances;

- further, detailed analyses were requested by the Committee for specific topics in order to assess their inherent potential risks and the quantitative and qualitative risk management approach, e.g. integration of OTP risk portfolio, issuance of AT1 instruments, derivatives business, F/X risk, business sectors risk management strategies, Bail-in Playbook and testing, critical outsourcings/ third party vendors, International sanctions / Anti Money Laundering / Terrorist Financing, Anti Financial Crime complex;
- in close cooperation with the Remuneration Committee of the Board of Directors, it addressed the impacts of the compensation framework on the bank's capital and liquidity position and made sure that the remuneration policy promotes sound and efficient risk management;
- it carefully assessed the business continuity management;
- it oversaw in 2025 the execution of the updated 2024-2026 Sustainability Strategy, with a specific focus on climate risk management, EBA guidelines on ESG Risk Management implementation effective 1 January 2026 and, together with the Audit Committee, the Group's non-financial risks reporting.

The committee systematically reviewed the performance of the BT Financial Group's loan portfolio and closely monitored the Group's risk management processes, ensuring continuous enhancement of risk management tools and practices in a dynamic risk environment.

The regular risk reports also contain regulatory reports and the Committee continued in 2025 to monitor the implementation of the recommendations issued by the National Bank of Romania. The Committee also oversaw the bank's recovery and resolution capabilities plan update and recommended the Board of Directors' approval for its submission to the National Bank of Romania.

Both the Risk Management Committee and the Audit Committee invited to its meetings the Chief Financial Officer (CFO) and the Chief Risk Officer (CRO), the specialized teams in the risk and financing areas, as well as external consultants to provide updates and support materials. The Internal Audit Chief Executive is a permanent invitee to the Risk Management Committee meetings.

The risk management structures subordinated to the Deputy CEO, Chief Risk Officer operate as an independent entity within the bank, supporting a wide range of controls that cover the risk identification and management process. The committee reviewed the main documents that cover the risk policies and procedures and, together with the Audit Committee, monitored the observance thereof.

The communication lines with the executive management are open to constructive and permanent dialogue. The Committee was satisfied that appropriate risk management practices and monitoring mechanisms were in place to identify, manage and mitigate risks effectively across the portfolios. There were no significant divergent opinions between the Risk Management Committee and the Board of Directors or the Leaders' Committee in 2025.

The Chairman of the committee follows the remuneration policies and in cooperation with the Remuneration Committee, makes sure that there are no incentives that could weaken the risk management decisions, the monitoring and control of the credit portfolio.

Outlook for 2026

Geopolitical risks and macroeconomic volatility are expected to continue influencing the operational environment in 2026. In this context, the Committee will maintain its focus on overseeing the Bank's compliance to the Risk Appetite Framework, both at the level of the parent company (the bank) and across the Group.

The Committee will also continue to monitor progress in implementing the key elements of the risk-management strategy, with an emphasis on strengthening the processes, tools and models that support effective risk management. Attention will remain directed towards identifying and assessing emerging risks, as well as monitoring regulatory developments at national and European level that may impact the Group's risk profile.

Working closely with other Committees of the Board of Directors, the Risk Management Committee will continue to seek assurance on applying best risk management principles, techniques and strategies for mitigating the bank's risk exposure and to further strengthen the risk management capabilities and risk-taking capacity in safeguarding the Bank's financial stability and its customers.

LEADERS' COMMITTEE

Purpose, responsibilities and principal duties

The Bank's leaders are appointed by the Board of Directors and are required to meet all the applicable legal requirements in force, including prior approval by the NBR before taking up their duties. Under the relevant legal provisions, the Board of Directors has mandated the Bank Leaders jointly (and with some exceptions, individually) with the exercise of the Bank's organizational and steering duties. The Rules and procedures of the Leaders' Committee are approved by the Board of Directors and any amendment to them may only

be made exclusively by decision of the Board of Directors and shall take effect upon such approval.

The structure of Banca Transilvania's Leaders Committee and their professional background as of December 31st, 2025, are as follows:

MEMBER	POSITION	PERSONAL DATA
ÖMER TETİK Since June 2013	Chief Executive Officer (CEO)	Middle East Technical University, Ankara, The Faculty of Economic Sciences, Honor Student. CV and bio: here .
<i>Alphabetical order</i>		
CĂTĂLIN CARAGEA Since July 2024	Deputy Chief Executive Officer Risk (CRO)	Masters` Degree, Bucharest University of Economic Studies, Faculty of Finance, Insurance, Banking and Stock Exchanges. CV and bio: here .
GEORGE CĂLINESCU Since September 2013	Deputy CEO, CFO	The American University in Bulgaria, Blagoevgrad, Bulgaria; Applied Economics, Business Administration. CV and bio: here .
ANDRZEJ DOMINIAK Since March 2024	Deputy Technology Officer (CTO)	Stanford University, Machine Learning. CV and bio: here .
OANA ILAȘ Since October 2022	Deputy CEO, Retail Banking	Executive MBA, United Kingdom. CV and bio: here .
TIBERIU MOISĂ Since May 2016	Deputy Chief Executive Officer MidCorporate & SME	Executive MBA, Sheffield University (UK). CV and bio: here .
BOGDAN PLEȘUVESCU Since April 2023	Deputy CEO Legal	Post-graduate courses in International Law - Institutions of the European Union, International Law, Faculty of Law, University of Bucharest CV and bio here .
LEONTIN TODERICI Since August 2013	Deputy Chief Executive Officer - COO	PhD in Cybernetics and Economic Statistics, Babes-Bolyai University, Faculty of Economics and Business Administration. CV and bio: here .

The Leaders' Committee reviews, endorses, approves, or, where appropriate, submits to the Board of Directors for approval the following: internal regulations, cost monitoring reports, the draft of the Revenue and Expenditure Budget, the draft of the Investment Program, the Balance Sheet, the Profit and Loss Account, and the Report on the Bank's activity.

The Leaders` Committee may delegate certain responsibilities to Committees; if deemed necessary, by express convocation, the Leaders` Committee may convene to address specific matters related to those committees.

The Executive Committee mandates tasks/responsibilities to the following committees:

- Assets and Liabilities Committee (ALCO);
- Procurement Committee;
- Human Resources Committee;
- Credit Policy and Approval Committees (CPAC – Corporate, CPAC – Retail);
- Head Office Credit and Risk Committees (CCR1, CCR2, Level 1 Retail Credit Competence / Level 1 Retail Post-Approval Services Competence, Retail Credit Committee);
- Committees specific to the activities of the Credit Remediation Department and the Workout, Insolvency and Bankruptcy Department (CW1, CW2, CR1, CR2 and CRW);
- Committee for Monitoring Debt Enforcement and Realization of Assets (CMESVA);
- Special Committee for Approval of Legal Enforcement/Litigation Status (CAES);
- Financial Institutions Credit Committee (CCIF);
- Branch Credit and Risk Committee (CCRS);
- Factoring Committee (FC);
- Data Management Steering Committee;
- Operational Risk Committee;
- ESG Committee.

ASSETS AND LIABILITIES MANAGEMENT COMMITTEE

The main objective of the Assets and Liabilities Committee is to manage the Bank's assets and liabilities. The Committee is appointed by the Leaders' Committee.

The meetings of the Assets and Liabilities Committee occur on a periodical basis or whenever required, upon the request of any member of the committee.

The Assets and Liabilities Committee receives informative materials and reports from the specialized structures within the Bank, it analyzes them and adopts decisions in areas such as the interest rate risk management, foreign exchange risk, liquidity risk, price risk and other related activity segments, for the purpose of ensuring adequate management of the Bank's assets and liabilities.

PROCUREMENT COMMITTEE

The main objective of the Procurement Committee is to decide BT's procurement policy and to approve all investments involving expenditure outside the contractual framework or exceeding the contractually regulated cost limits, according to the competence limits established through internal rules.

In exercising its responsibilities, the Committee analyses the opportunity of proposed investments and acquisitions, assesses whether they fall within the approved investment budget, monitors the progress of investments, identifies any unjustified cost deviations and proposes optimization measures.

HUMAN RESOURCES COMMITTEE

The Human Resources Committee is a structure established to support the development and efficiency of decision-making processes regarding matters related to Banca Transilvania's personnel.

In exercising its responsibilities, the Committee reviews and endorses key aspects related to staff structure, appointments to managerial roles and submits them to the competent bodies; approves salary adjustments, benefits and other remuneration elements; validates annual evaluations and professional development programs. The Committee also assesses remuneration and performance-evaluation policies and reviews and supports professional development initiatives.

CREDIT POLICY AND APPROVAL COMMITTEES (CPAC CORPORATE, CPAC RETAIL)

The Committees for Credit Policy and Approval have as main objective to establish BT's credit policy and to approve the credit facilities which exceed in terms of value or conditions the competences of other bodies or employees of the Bank.

HEAD OFFICE CREDIT AND RISK COMMITTEES (CCR1,CCR2, LEVEL 1 RETAIL CREDIT COMPETENCE/LEVEL 1 RETAIL POST-APPROVAL SERVICES COMPETENCE, RETAIL CREDIT COMMITTEE)

The main objective of the Credit and Risk Committees at the Bank's headquarters is to analyze and approve loans and loan restructurings, respectively, in accordance with their delegated authority. The Credit Policy and Approval Committee delegates to CCR1, CCR2, Level 1 Retail Credit Authority/Level 1 Retail Post-Approval Services Authority, the Retail

Credit Committee, and the Mediation Committee (CM) the authority to approve loans, with such authority being established by specific internal regulations.

COMMITTEES SPECIFIC TO THE ACTIVITIES OF THE CREDIT REMEDIATION DEPARTMENT AND THE WORKOUT, INSOLVENCY AND BANKRUPTCY DEPARTMENT (CW1, CW2, CRS, CR1, CR2 AND CRW)

Within the Credit Remediation Department (DRC) and the Workout, Insolvency and Bankruptcy Department (DWIF), operate a series of specialized committees whose main objective is to analyse and decide on the implementation of the remediation/workout solutions proposed by these departments.

Remediation solutions aim in particular to support the recovery of clients experiencing financial difficulties, with the goal of improving their repayment capacity, whereas the workout solutions focus to increase the recovery rate of the Bank's exposure. CW1, CW2, CRS, CR1 and CR2 perform activities assigned through the internal regulations.

COMMITTEE FOR MONITORING DEBT ENFORCEMENT AND REALIZATION OF ASSETS (CMESVA)

The Committee for Monitoring Debt Enforcement and Realization of Assets is appointed by the Leaders' Committee and has as its main responsibility to supervise the entire management function of real estate assets under enforcement procedures or resulting from the enforcement of collateral established for loans granted to individuals or legal entities.

SPECIAL COMMITTEE FOR APPROVAL OF LEGAL ENFORCEMENT / LITIGATION STATUS (CAES)

The main objective of the Special Committee for Approval of Legal Enforcement/Litigation Status (CAES) is to analyze and make decisions regarding the initiation of enforcement procedures for customers proposed by the debt collection officers within the Debt Collection Department. This applies to individual and corporate customers with outstanding debts that can no longer be recovered amicably.

FINANCIAL INSTITUTIONS CREDIT COMMITTEE (CCIF)

The Financial Institutions Credit Committee's main purpose is to supervise the activities involving the credit exposure of Banca Transilvania to financial institutions in Romania and abroad. CCIF approves all derogations from the internal regulations and procedures in force

that establish the workflow between BT and other financial institutions from Romania and abroad.

BRANCH CREDIT & RISK COMMITTEE (CCRS)

The main objective of the Branch Credit and Risk Committee is to analyze and approve legal entity (corporate) loans, the restructuring of legal entity loans (generically referred to as *loan approval*) according to the competencies granted, respectively the management and monitoring of the individual loan portfolio.

FACTORING COMMITTEE

The main objective of the Factoring Committee is to analyze and approve factoring facilities, in both local currency and foreign currency, that fall under its competence, based on the information included in the credit memorandums/Risk Evaluation Forms, and in accordance with the granted competencies.

DATA MANAGEMENT STEERING COMMITTEE

The Data Management Steering Committee strengthens the bank's data strategy and reflects the management's commitment to monitoring and managing the implementation of programs, platforms, and data governance.

The committee establishes, supports, and monitors the bank's data management capabilities and serves as the framework for escalating issues or reporting decisions with an impact on the bank's data strategy.

OPERATIONAL RISK COMMITTEE

The Operational Risk Committee aims to assess the operational risk arising from the Bank's activities, ensuring that each organizational structure implements specific operational risk control policies and procedures and takes remedial action whenever a high-risk level area is identified and then monitors their implementation.

It ensures that the formalization and complexity of operational risk and information technology risks are appropriate to the bank's risk profile and business strategy and examines future technological trends that may affect the bank's strategic plans, including

monitoring emerging technologies and how to mitigate the risks in the field of IT security associated with them.

At the same time, based on the investigation reports provided by the Anti-Fraud Department, which contain proposals for modifying or supplementing processes, workflows or procedures in connection with which fraud incidents have occurred, the Committee analyzes and determines the appropriate manner of implementation, assesses the need to adjust existing processes and internal controls to reduce operational risks and prevent similar situations from recurring.

ESG COMMITTEE

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

In 2025, BT achieved the highest rating for the seventh consecutive year in [VEKTOR](#), the indicator that measures the quality of investor communication for companies listed on the Bucharest Stock Exchange. ESG performance and the robustness of the business model are reflected in external assessments received. [Fitch Ratings](#) and [Moody's Ratings](#) have improved the Bank's ratings compared to previous years, due to the quality of its asset-portfolio, robust capitalization and financial resilience. These results are complemented by the ESG rating awarded by Refinitiv, a London Stock Exchange Group company, which places BT in the top 10% of more than 1,100 financial institutions evaluated worldwide, highlighting a high degree of transparency in the public reporting of sustainability materials.

Accessibility also remains an important component of the Social pillar within the Bank's ESG strategy. In this regard, BT has published its [Accessibility Statement](#) and initiated a process of assessing and improving digital accessibility in accordance with WCAG standards.

BT GROUP DIVERSITY AND EQUAL OPPORTUNITIES POLICY

This policy aims to promote diversity within Banca Transilvania Financial Group's management body (Board of Directors and Leaders' Committee). The Banca Transilvania

Financial Group recognizes and embraces the benefits of a diversified management body as a pathway to improve the quality of its performance. The BT principles also apply to the entities within the BT Financial Group. Since 2023, the BT Group is one of the signatories of the [Charter of Diversity in Romania](#).

In order to achieve sustainable and balanced development, Banca Transilvania considers the increased leadership diversity as an essential element in supporting the achievement of its strategic objectives.

In designing the structure of the management body, in regard to issues of diversity, we considered several criteria, among which (but not limited to): gender, age, cultural and educational profile, ethnicity, professional experience, skills, knowledge and work experience. All appointments to the management body are based on meritocracy, and applicants will be considered on the basis of objective criteria, taking into account the benefits of diversity within the body.

For Banca Transilvania, although diversity and the variety of experiences and perspectives represented within the management body must always be taken into consideration, a candidate should neither be selected or excluded, exclusively or predominantly, on the grounds of race, color, gender, national origin or sexual orientation. In selecting a candidate, the Nomination Committee shall prioritize the skills, national and international experience or cultural profile that would complement the existing management body, recognizing that the Bank's activities and operations are diverse and of a national nature with a global impact.

Reflecting the international nature of banking activities, Banca Transilvania's directors and Executive Officers are Romanian citizens as well as citizens and residents of other countries. Most BT directors and managers come from banking environments in Romania and abroad.

For Banca Transilvania, while the governing body should not adhere to a fixed number of directors, a governing body of 6-14 members, generally, provides a sufficiently large and diverse group to address the important matters faced by the Bank, while remaining small enough to encourage personal involvement and constructive discussion.

The current directors and managers of Banca Transilvania have been in leadership positions in various organizations or within Banca Transilvania, demonstrating their ability to exercise top-level management responsibilities and to steer the Bank. They were senior executives within prestigious international institutions, where they developed skills and experience in terms of strategy and business development, innovation, operations, brand management, finance, IT, compliance, decision-making and risk management. These skills, together with their accumulated experience, enable them to engage in addressing

challenges faced by an international company in today's environment, ensuring proper oversight of these areas within the Bank and thus assessing BT's performance.

All members of the management body also have significant experience in corporate governance and the oversight of complex businesses, through their roles of executive managers, directors, administrators, or other relevant functions within other large institutions.

Some of the Bank's directors have relevant experience in areas specific to financial and banking institutions such as audit, risk management and stock markets. All these skills and experiences are relevant to current strategies as well as to encourage Bank development, enabling managers and directors to provide diverse perspectives, valuable advice and critical points about new business opportunities, product launches, new markets, solutions for the problems faced by the institution, as well as those faced by the banking system both at local and national level.

Measurable objectives concerning the maintaining diversity standards within the management body of Banca Transilvania

Candidate selection is based on a range of diversity dimensions, including, but not limited to, gender, age, cultural and educational background, ethnicity, professional experience, skills, knowledge and seniority. The final decision is based on the merit and contribution that the selected candidates will bring to the management body. The composition of the management body (including gender, ethnicity, age, seniority) will be periodically disclosed on Banca Transilvania's website.

The Board of Directors and the Leaders' Committee of Banca Transilvania view diversity as a factor in selecting members of the management body, acknowledging that promoting diversity at this level brings significant benefits to the Bank. The Nomination Committee uses a variety of criteria in selecting candidates for the position of a director or manager, including background diversity.

Banca Transilvania considers that an eligible potential member of the management body must be able to work in an effective manner with individuals from diverse educational, cultural and business backgrounds and must have skills that complement the attributes of existing members.

Banca Transilvania also encourages the enhancing of women representation - currently the under-represented gender in the leadership structure- within the management structures, in order to support balance, diversity and high performance of the company. In this regard, candidates for middle management positions represent an important pipeline for potential further candidates for vacant positions in the management body, not only for Banca

Transilvania but for the entire banking system, taking into account the specific suitability requirements applicable to the management of credit institutions.

Furthermore, Banca Transilvania considers that appointment to leadership roles cannot be based solely on gender, as such practices may undermine the competence and independence of the appointed person. Therefore, we believe that the effective and sustainable development of the Bank can be achieved by ensuring a framework for the growth and personal development of female employees under the same conditions as for men.

In 2025, the number of female employees attending trainings for professional development was over seventy-one percent (71%) of the total number of employees. In terms of hiring/promotions that have been made at director/manager level, approximately sixty-six percent (66%) of those appointed to these positions are women. Thus, the goal of Banca Transilvania to increase the representation of women in the BT governing body is considered to have been achieved. Therefore, Banca Transilvania considers that the Leaders` Committee in its current composition, meets the overall diversity requirements, in accordance with the Bank`s diversity practices defined above.

Banca Transilvania has created an environment for the sustainable development of its employees through professional training courses that are offered without discrimination of any kind, according to needs, the nature of the activity and the role performed.

Monitoring and reporting

The Nomination Committee will regularly monitor compliance with the European requirements related to the composition of the management body from the diversity perspective. In order to maintain and develop a balanced, functional and effective management body, the Nomination Committee may, when appointing a candidate take into account additional skills, experiences or competencies that it considers relevant for the decision. Thus, the Nomination Committee may consider diversity when evaluating candidates for membership in the management body.

Banca Transilvania considers that diversity in terms of cultural background, experience, skills, race, gender and national origin is an important element in the composition of the management body. The Nomination Committee analyses the diversity considerations regarding each candidate, as well as, periodically, in relation to the overall composition of the management body.

The Nomination Committee outlines a profile of proper skills and characteristics required by members of the management body, considering its current composition. This assessment includes expertise (including international and financial-banking experience), independence, integrity, diversity and age, as well as technical skills related to banking,

production, finance, marketing, technology and public policy. The main eligibility criteria considered are those arising from legal requirements, and the Committee ensures that a majority of the management body remains independent.

HUMAN RIGHTS PRINCIPLES

These principles set out the guidelines regarding the respect of human rights within the activities carried out by Banca Transilvania, as well as by the companies within the Banca Transilvania Financial Group

The Bank supports, through its social responsibility practices, the Romanian entrepreneurial spirit, the development of responsible businesses, sustainable growth, quality, solidarity, responsibility, engagement and the building of positive relationships with stakeholders, going beyond traditional banking activities. In implementing social responsibility policies, Banca Transilvania undertakes all necessary efforts to ensure the continuous respect of fundamental human rights by continuously encouraging and developing good practices in this area, while promoting ethical, transparent behaviour aligned with relevant international standards.

Banca Transilvania S.A. is a credit institution registered in Romania, operating in Romania and Italy. Subsidiaries of Banca Transilvania Financial Group operate in Romania, as well as in the Republic of Moldova (B.C. Victoriabank S.A., BT Leasing Moldova S.R.L., O.C.N. Microinvest S.R.L., Microinvest Technology S.R.L.). In this regard, Banca Transilvania and its subsidiaries reaffirm their strong commitment to compliance with European and national Human Rights protection rules, including, but not limited to, the rights set forth in the European Convention on Human Rights. The Financial Group acts in accordance with these principles in all jurisdictions in which it operates, promoting high standards of conduct, respect, integrity and social responsibility.

Banca Transilvania and the companies within the BT Financial Group comply with the following:

- In connection with the employees of the Banca Transilvania Financial Group, Banca Transilvania and its subsidiaries comply with all the requirements regarding the protection of human rights and discourage any internal practices that could affect and/or harm the fundamental rights of their employees. Banca Transilvania also encourages the development of its employees' knowledge of human rights, to ensure compliance with these requirements in their relationships with customers and beyond. Any violation of the fundamental human rights by the BT Financial Group employees is sanctioned in accordance with the legal provisions and the internal rules of the Bank.
- To strengthen the protection of employee rights, BT has created internal reporting mechanisms, such as the [Whistlelink](#) application, which is a confidential reporting channel available to both business partners and BTFG employees for reporting potential fraud, violations of the Code of Ethics and Conduct, breaches of the Internal Regulations, specific internal rules of subsidiaries, or violations of the law

(money laundering, bribery, etc.). Within this application, reports can be submitted regarding legitimate and substantial concerns related to aspects of the business management framework, and all cases are analyzed by a specialized group, with each report receiving a unique tracking code.

- In relation to the companies with which it conducts business, the Bank pays maximum attention during the selection process of third-party collaborators, ensuring that partnerships are initiated only with those entities that assume compliance with the human rights principles mentioned above, their activities being adequately monitored, in compliance with the applicable legal provisions.
- Banca Transilvania also maintains transparency and accountability in its business relations and governance through constant communication with regulatory authorities and investors, ensuring access to information and periodic reporting. In addition, it applies a top-down, governance-driven approach combined with a bottom-up, social and environmental team-oriented approach to foster a strong stakeholder engagement culture and to ensure sufficient resources and support for effective engagement practices.

POLICIES FOR THE PREVENTION OF CORRUPTION AND BRIBERY

The companies within the Banca Transilvania Financial Group do not tolerate any form of bribery and /or corruption. No employee/member of the governing body of any company within the Group may accept or grant any improper advantage of any kind, regardless of whether the person offering or requesting such an advantage works in the public or private sector. Offering or receiving any form of bribe or engaging in influence peddling, directly or through intermediaries, is strictly prohibited.

Strictly prohibited actions include:

- Receiving money or other benefits from clients or third parties in exchange for performing their duties or to intervene with another employee/manager to perform or not perform actions outside their responsibilities;
- Paying or offering any benefit that violates domestic laws or internal regulations;
- Paying or offering any benefit to „secure“ a business.

Employees/members of the governing bodies of any of the companies within the Banca Transilvania Financial Group must not make any kind of facilitation payments, these payments being „expediting payments or „informal fees“, usually small, unofficial amounts of money, handed over to public or government officials for the purpose of obtaining, urgent or delay a routine action to which someone has access by legal right (e.g. issuing a permit, a license, an agreement or an immigration visa, scheduling an inspection associated with the contract performance; providing services or releasing products held in customs).

The companies within the Banca Transilvania Financial Group have established a fair and formalized framework for selecting suppliers, collaborators, brokers, consultants, intermediaries and all other third parties acting on behalf of the companies within the group in carrying out their activities.

Maximum attention is paid to selecting third-party collaborators, ensuring partnerships only with entities committed to the principles presented above, with their activities monitored in accordance with internal procedures.

The Bank applies the above requirements in accordance with the legal provisions and in accordance with applicable internal regulations. These principles are complemented by the applicable normative acts and referenced documents.

In 2024, Banca Transilvania implemented a well-structured action plan to manage the material impact, risks, and opportunities related to corruption and bribery. The main key measures adopted include continuous mandatory training for employees, with focus on risk areas, as well as conducting annual internal audits of procurement and contracting processes to identify any irregularities.

Additionally, in 2024, a rigorous system for reviewing supplier relations through due diligence and reputational screening was implemented, which helps the Bank to prevent exposure to fraud, corruption, and other reputational risks. These measures are applied across the Bank's supply chain, having a direct impact on employees and suppliers.

Last but not least, the Bank maintains active cooperation with the competent authorities to identify potential cases of corruption or bribery.

POLICY AGAINST ANTI-MONEY LAUNDERING

In order to ensure compliance with the requirements for preventing and combating money laundering and terrorist financing, the Bank has implemented, since December 2020, the suite of Siron applications (AML, KYC, Embargo), designed to monitor the customer base and transactions.

In addition, the prevention and combating of money laundering activities are subject to an internal control process on the customer portfolio, based on risk indicators selected following periodic assessments carried out at the credit institution level.

REMUNERATION POLICY (APPLICABLE TO IDENTIFIED PERSONNEL)

The main objective of Banca Transilvania Financial Group in the area of remuneration is to comply with the principle of fairness, taking into account the business strategy and risk strategy, corporate culture and values, the long-term interests of the institution, and the measures used to avoid conflicts of interest, without encouraging excessive risk-taking and promoting sound and effective risk management.

The remuneration policy for all staff is gender-neutral, with all staff being remunerated equally for the same work or for work of equal value, and internal rules and standards are regularly updated to reflect best practices.

The internal remuneration framework supports the Group in achieving and maintaining a viable capital base. The Group identifies those categories of staff with a significant impact on the risk profile ("Identified Staff/Personnel") in accordance with the provisions of the EU Regulation No. 923/2021 and conducts periodic assessments to determine them, taking into account the applicable legal requirements.

Link between total remuneration and performance

In accordance with the legislative provisions in force regarding sound remuneration policies, there are two types of remuneration granted: fixed and variable, according to the following principles:

Remuneration is fixed when the conditions for granting it and its amount: i) are based on predetermined criteria; ii) are non-discretionary, reflecting the level of professional experience and seniority of the staff; iii) are transparent with regard to the individual amount granted to the individual staff member; iv) are permanent, i.e. they are maintained for a period linked to the specific role and organizational responsibilities; v) are non-revocable; the permanent amount is not changed except through collective bargaining or renegotiation in accordance with national criteria for setting salaries; vi) cannot be reduced, suspended, or canceled by the institution; vii) do not provide incentives for risk-taking; viii) do not depend on performance.

Remuneration is variable when it does not meet the characteristics of the fixed component and is linked to: (i) individual performance; (ii) the performance of the operational unit; (iii) the overall results of the Group.

Performance is assessed on a multi-year basis to ensure that the assessment process is based on long-term performance and that the actual payment of performance-based remuneration components is spread over a period that takes into account the Group's business cycle and the specific risks of its entities.

The annual individual performance assessment process takes into account both financial and non-financial criteria (including individual objectives and competencies with a minimum rating of "3"), collective financial criteria (budget indicators, NPS) and the final rating, criteria established in accordance with the rules described in the internal methodology.

For "identified personnel" in the management body category, the performance assessment on which variable remuneration is based is carried out in accordance with the Remuneration Policy for the BT management body. The variable component is determined taking into account indicators that discourage excessive risk-taking.

The remuneration of independent control functions is predominantly fixed, and when there is a variable component, its level is not linked to the budgetary objectives of the organization or the performance of the activities that the control function monitors and controls, but to the achievement of the objectives related to those functions.

The same principles of linking variable remuneration to performance also apply to "identified staff" at GFBT level within the subsidiaries of the BT Financial Group, in compliance with internal provisions (in particular, those established by the Regulation on the remuneration of Banca Transilvania Financial Group personnel (N.15.12._)).

Deferral policy

For Identified Personnel, a substantial portion, representing in all cases at least 40% of the variable component of the total remuneration, is deferred for a period of 4 years and is adequately correlated with the nature of the activity, its risks, and the activities of the personnel concerned, except for non-EU entities or those with remuneration policies specific to their sector of activity. The rule applies only to total variable annual remuneration exceeding €50,000 gross and not exceeding more than 1/3 of total annual remuneration, in accordance with the principle of proportionality and immateriality of risk as defined in the applicable regulations.

The deferral and payment in instruments provisions do not apply to entities within the prudential consolidation scope of the non-EU BT Group and/or those with remuneration policies specific to their sector of activity or those that do not meet the conditions in terms of company size (with averages equal to or less than EUR 1 billion in the 4-year period immediately preceding the current financial year).

Up to 100% of the total variable remuneration may be subject to malus or claw back agreements. Remuneration rights, including deferred remuneration, are granted only if the variable remuneration is sustainable in light of the Group's overall financial situation and can be justified in light of the performance of the bank, the structure in which the activity is carried out, and the employee concerned.

For annual variable remuneration of a particularly high amount (over RON 1,500,000 net) granted to Identified Staff (including members of the management body), at least 60% of the amount is deferred for a minimum period of 5 years.

Banca Transilvania does not apply the derogation for small trading portfolios, in accordance with Regulation (EU) No. 575/2013.

The ratio between fixed and variable remuneration

For Identified Personnel, total remuneration consists of a fixed component and a variable component that cannot exceed 100% of the fixed component of total annual remuneration.

The fixed and variable components of total remuneration are appropriately balanced, and the fixed component represents a sufficiently large proportion of total remuneration to allow for a fully flexible policy on variable remuneration components, including the possibility of paying no variable remuneration.

Information on the performance criteria on which the entitlement to shares, options, or other variable remuneration components are based

The general performance criteria on which the entitlement to shares or other variable components of remuneration (cumulative) is based are:

- Achievement of the gross profit target for the year for which the assessment is made (for the base portion) and/or for the previous year (in the case of the deferred portion);
- Maintaining capital adequacy and liquidity indicators, as well as keeping the Bank's overall risk profile within the levels set out in the Risk Appetite Statement (RAS);
- Maintaining the Bank in one of the top three positions in the ranking of banks in Romania, based on the quota of assets held on December 31 of the year for which the assessment is made.

Main parameters and rationale for the structure of the variable remuneration component

The performance measurement used to calculate the variable remuneration components or portfolios of variable remuneration components includes an adjustment for all types of current and future risks and takes into account the cost of capital and the necessary liquidity. The allocation of variable remuneration components within the Group also takes into account all types of current and future risks.

For Identified Staff members, at least 50% of any variable remuneration must be represented by a balanced combination of shares and, where possible, other instruments, such as Additional Tier 1 or Tier 2 instruments (in accordance with Article 52 or 63 of Regulation (EU) No 575/2013), or other instruments that can be fully converted into Common Equity Tier 1 or Tier 2 instruments, which in each case adequately reflect the Group's credit quality on an ongoing basis and are suitable for use for the purpose of

variable remuneration. Thus, at least 50% of the annual variable remuneration linked to performance is paid in BT shares, acquired by the Bank for this purpose and granted through a Stock Option Plan.

The same principles apply to "identified personnel" within the subsidiaries of Banca Transilvania Financial Group, except for:

- small subsidiaries for which the provisions on payment in instruments, deferral, and vesting do not apply if they had assets with an average and individual value equal to or less than EUR 1 billion during the four-year period immediately preceding the current financial year. If the value of the assets exceeds EUR 1 billion, these provisions apply only in the case of total annual variable remuneration exceeding EUR 50,000 gross and if the total annual variable remuneration represents more than 1/3 of the total annual remuneration of the respective member of staff, the principle of proportionality and immateriality of risk as defined in the applicable regulations and in accordance with the remuneration practices of the BT Financial Group shall apply in this context.
- investment subsidiaries and those in the Republic of Moldova, which are subject to specific regulations of the country or field to which they belong. Thus:
 - At BT Asset Management S.A.I. S.A. and INNO Investments S.A.I. S.A., variable remuneration for Identified Personnel is paid 50% in RON and 50% in fund units/instruments, applying the principles of deferral and payment in accordance with the company's specific remuneration policy, aligned with the legal regulations applicable to the sector of activity;
 - At Victoriabank, for Identified Personnel, variable remuneration is granted 50% in MDL and 50% in instruments linked to the TLV shares of the parent company Banca Transilvania, of the shadow shares type, applying the principles of deferral and payment in accordance with the company's specific remuneration policy, approved by the National Bank of Moldova and aligned with the legal regulations applicable in the Republic of Moldova;
 - At BT Leasing Moldova for Identified Personnel, a minimum of 50% of variable remuneration is granted in TLV shares of the parent company Banca Transilvania, applying the principles of deferral and payment in accordance with the company's specific remuneration policy, aligned with the legal regulations applicable in the Republic of Moldova;
 - BT Capital Partners S.A. for Identified Personnel, at least 50% of the variable remuneration is granted in TLV shares of the parent company Banca Transilvania, with the application of the specific regulation on exclusions from deferral and payment in applicable instruments, namely Directive (EU) 2019/2034 of the European Parliament and of the Council of November 27, 2019, on the prudential supervision of investment firms

and amending Directives 2002/87/EC, 2009/65/EC, 2011/61/EU, 2013/36/EU, 2014/59/EU, and 2014/65/EU.

Quantitative information pursuant to Article 450 of Regulation (EU) No. 575/2013 on the disclosure requirements for remuneration policies is published on the website of Banca Transilvania.



BT HIGHLIGHTS JANUARY TO MARCH 2026

- How we started 2026
 - Promoting Romania's Investment Opportunities in Vienna
 - BT Founders' Annual Meeting
 - News from BT Group Companies:
Milestones and Strategic Partnerships
 - Additional resources
 - Annex 1 – Sustainability Statement
 - Annex 2 – Remuneration Report of Banca Transilvania's
Management Body in 2025
- 

HOW WE STARTED 2026

PROMOTING ROMANIA'S INVESTMENT OPPORTUNITIES IN VIENNA

Attendance at the CEE Forum, Vienna

In January 2026, Banca Transilvania Group participated in *The Central & Eastern European Forum – Where CEE Markets Thrive*, an event organized by FT Live in Vienna. As part of the region's most important economic and financial event, [Banca Transilvania organized the Focus Romania panel](#), dedicated to promoting Romania as an investment destination, highlighting the potential of the local economy and the opportunities offered to international investors.

Also, at the CEE Forum in Vienna, Banca Transilvania presented the [BT Research](#) platform, a tool designed to provide relevant economic information about Romania. The platform offers quick access to key macroeconomic indicators, market outlooks, and economic analyses that contribute to a better understanding of the local financial landscape. Designed to support decision-making with structured, up-to-date, and user-friendly information, BT Research is addressed to professionals interested in the developments in the Romanian economy.

BT Event at the Romanian Embassy in Austria

On January 12, 2026, in Vienna, Banca Transilvania Group started this year's series of international events with a meeting organized in partnership with the Romanian Embassy in the Republic of Austria. The event, "[Connecting Growth – Investing in Romania](#)" provided a platform to highlight Romania's potential as an attractive destination for solid, long-term investments. At the same time, the event reaffirmed Banca Transilvania and BT Capital Partners' commitment to supporting Romanian companies in their foreign expansion strategies and to actively contributing to building sustainable economic bridges between Romania and European markets.

BT FOUNDERS' ANNUAL MEETING

Banca Transilvania celebrated 32 years of operations in February 2026, marking this anniversary with the [BT Founders' Meeting](#), an annual event through which the bank honors its beginnings and those who laid the foundation for its story with confidence, courage, and optimism.

Back in time: 1993, the year it all began

The idea of establishing a bank headquartered in Cluj-Napoca came from Dan Palagheanu (Radu Dănuț Palagheanu), who, together with his partners at Compexit—another Cluj-

Napoca-based company – formed the core group of the bank's founders, later joined by other investors. In the end, the group grew to 46 founders, most of whom were local entrepreneurs.

The bank was launched in 1993 with an initial capital of USD 2 million and the ambition to build a landmark bank in Transylvania. That is where the name came from.

NEWS FROM BT GROUP COMPANIES: MILESTONES AND STRATEGIC PARTNERSHIPS

Investment funds are gaining ground: BT Asset Management, 450,000 investors, and RON 10 billion in assets under management

[BT Asset Management](#) SAI (BTAM) has reached 450,000 investors and hit the historic milestone of RON 10 billion in assets under management, equivalent to approximately EUR 2 billion. Nearly 40% of all transactions performed by the BTAM clients targeted the fund that tracks the ROTX index on the Bucharest Stock Exchange, confirming the growing appetite for investments linked to the local capital market. In 2025, nearly 60% of all the Romanians who started their journey in funds' investments chose the funds managed by BTAM. The community has grown significantly: the number of investors in BTAM funds is now four times higher than in 2023.

Alternative Real estate Investment Fund: BT Property is expanding its presence in the premium office segment through the acquisition of Record Park

[BT Property](#), an alternative real estate investment fund targeting professional investors and managed by [INNO Investments](#) SAI SA, a company of Banca Transilvania Financial Group, has acquired [Record Park](#) from [AYA Properties Fund](#) (Belgium).

BT Property's portfolio comprises properties in the retail, office, and medical segments, with a total leasable area of approximately 43,000 square meters, including the most recent acquisition. The fund manages assets worth approximately EUR 79 million and, since its launch, has generated a return of over 55%.

BT Broker de Asigurare, expansion through its own franchise network

[BT Broker de Asigurare](#) took an important first step in expanding its own franchise network by signing its first partnership of this kind with DIASIG VEST, in February 2026. This collaboration model, with local partners, accelerates BT Broker's expansion into high-potential areas and supports the company's repositioning as an integrated player in the insurance market. For partners, joining the BT Broker network means the backing of Romania's largest financial group, the association with a very strong brand, and access to a diversified portfolio of insurance products.

Microinvest, international financing to accelerate the growth of SMEs in the Republic of Moldova

[Microinvest has signed](#) a EUR 20 million financing agreement with the European Bank for Reconstruction and Development (EBRD). The multi-currency senior loan will support the company's competitiveness and resilience and strengthen Microinvest's ability to continue supporting micro, small, and medium-sized enterprises in the Republic of Moldova.

It also secured the [largest loan in the company's history](#) through an agreement with the U.S. International Development Finance Corporation (DFC). The financing strengthens Microinvest's role as a leading partner in microfinance for local entrepreneurs, including those in rural areas and in the agricultural sector.

ADDITIONAL RESOURCES

- [BT's platform for investors and shareholders communication](#)
- [General Meeting of Shareholders 2025](#)
- [Financial results 2025](#)
- [Filings](#)
- [ESG & Sustainability](#)
- [BT Research](#)
- [BT Newsroom](#)

ANNEX 1

- [Sustainability Statement](#)

ANNEX 2

- [Remuneration Report of Banca Transilvania's Management Body in 2025](#)

2025





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**SUSTAINABILITY
STATEMENT**

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1. General Information

1.1 Basis of Preparation of the Sustainability Statement

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

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

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

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

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

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

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

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

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

Omitted Information

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

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

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

Information on the value chain

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

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

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

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

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

BP-2 – Disclosures in relation to specific circumstances

Time horizons

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

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

Assumptions, estimates, and approximations

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

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

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

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

Standards used for calculating or reporting of certain indicators

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

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

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

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

1.2 Governance and Responsibilities

Shareholders

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

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

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

Shareholder Structure for Banca Transilvania S.A.

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

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

Shareholder Structure for Victoriabank

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

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

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

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

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

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

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

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

Within the Bank, it has the following structure:

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

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

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

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

Composition of the Board of Directors by gender and age

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

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

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

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

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

Composition of the Leaders' Committee by gender and age

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

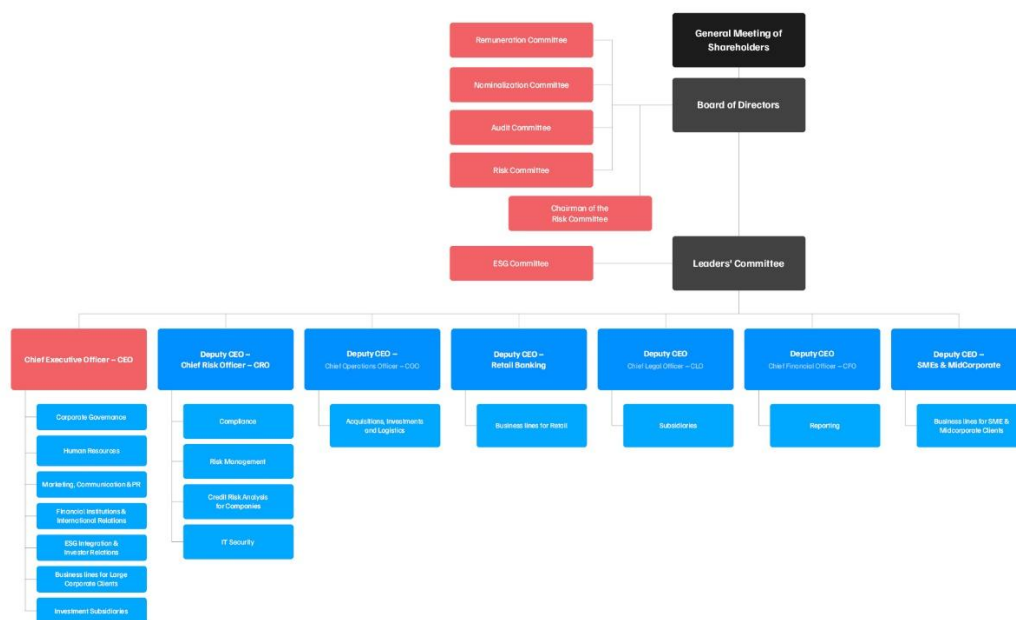
With regard to the knowledge, skills, and experience of the management body, within Banca Transilvania, the Nomination Committee is responsible for assessing these in accordance with the principles and policies for staff nominations, which must be aligned with the Bank's strategy and values.

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

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

Sustainability Governance

Banca Transilvania Governance Structure



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

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

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

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

The Audit Committee verifies compliance with applicable ESG regulations.

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

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

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

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

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

The main categories of responsibilities in this regard include:

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

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

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

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

SME and Corporate Business Line

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

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

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

Retail Banking Business Line

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

Large Corporate Clients Business Line

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

Support Functions in Banca Transilvania's Departments

The Deputy CEO, CRO, oversees:

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

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

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

Reporting (reporting to the Deputy CEO, CFO):

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

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

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

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

Senior Executive Director of Human Resources:

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

Executive Director of Marketing, Communications, and Customer Experience:

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

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

Sustainability Governance within Subsidiaries

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Informing management bodies on sustainability-related issues

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

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

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

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

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

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

Developing the appropriate skills and expertise to oversee sustainability aspects

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

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

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

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

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

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

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

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

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

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

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

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

DR GOV-4 – Statement on due diligence

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

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

Risk management system and internal controls for the sustainability reporting process

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

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

Key identified risks, their assessment, and control measures

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

Integration of findings into internal functions

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

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

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

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

1.3 Strategy and Business Model

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

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

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

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

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

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

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

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

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

BT Mic

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

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

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

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

Salt Bank

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

BT Leasing

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

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

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

BT Asset Management

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

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

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

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

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

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

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

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

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

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

BT Pensii

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

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

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

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

BRD Pensii

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

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

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

BT Capital Partners

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

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

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

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

INNO Investments

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

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

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

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

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

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

BT Direct

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

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

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

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

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

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

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

Victoriabank

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

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

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

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

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

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

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

Microinvest

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

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

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

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

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

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

BT Leasing Moldova

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

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

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

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

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

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

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

BT Broker

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

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

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

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

Improvement Credit Collection

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

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

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

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

Awards, Recognitions, and Affiliations

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

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

Rating-uri

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

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

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

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

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

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

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

Credit ratings assigned to Banca Transilvania S.A.:

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

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

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

Sustainalytics

For the third consecutive year, Banca Transilvania received a Low ESG Risk rating from Sustainalytics. BT achieved a score of 14.9, an improvement over the score obtained in 2023 (15.1). This score ranks BT 119th out of 1,040 banks analyzed globally and in the top 11% of both all companies analyzed by Sustainalytics and all evaluated banks. Sustainalytics analyzed the following areas: corporate governance, integration of ESG factors into the business model, quality and sustainability of products and services offered to customers, data privacy and security, business ethics, and human capital development.

Refinitiv

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

FTSE Russell

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

Awards and recognition

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

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

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

Affiliations

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

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

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

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

General Strategy and Sustainability Goals

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

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

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

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

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

Our sustainability goals

Pillar: **PERFORMANCE**

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

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

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

Pillar: **PEOPLE**

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

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

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

Pillar: **ENVIRONMENT**

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

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

Assessment of Current Products, Services, and Markets

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

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

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

Strategic Elements and Key Challenges

Initiatives to support sustainability goals:

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

Key Challenges

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

Critical resources for our operations

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

Value generated

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

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

Position in the value chain

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

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

DR SBM-2 – Interests and views of stakeholders

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

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

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

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

Investor Relations

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

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

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

Net Promoter Score – NPS

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

Integrating stakeholder interests into the strategy and business model

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



No new forms of impact or opportunities have been identified.

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

List of material impacts, risks, and opportunities

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

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

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

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

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

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

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

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

contamination, resource depletion, and increased greenhouse gas emissions.

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

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

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

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

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

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

1.4 Impacts, Risks, and Opportunities

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Assessment of the probability of risks associated with the portfolio

Probability was determined based on:

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

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

Risks associated with governance and social issues

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

- significant fines

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

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

Controls Implemented

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

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

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

Changes from the Previous Reporting Period

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

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

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

2. Environmental Information

2.1 EU Taxonomy

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

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

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

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

1. Regulatory framework on the EU Taxonomy

1.1 Overview of the framework

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

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

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

- Commission Notice C/2025/1373

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

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

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

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

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

1.2 Significant legislative changes

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

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

The main changes introduced:

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

1.3 Changes in presentation and reporting

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

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

2. Scope of reporting

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

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

3. Methodology for calculating GAR indicators

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

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

For exposures to undertakings, a distinction is made between:

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

3.1 Undertakings with Known Use of Proceeds (KUoP)

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

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

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

Exposures were considered eligible for the alignment analysis only if:

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

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

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

3.2 Undertakings with unknown use of proceeds (UUoP)

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

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

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

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

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

3.3 Households - mortgage loans

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

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

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

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

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

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

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

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

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

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

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

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

4. EU Taxonomy Indicators

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

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

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

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

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

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

Disclosures in accordance with Annex XI

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

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

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

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

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

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

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

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

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

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

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

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

		Total environmentally sustainable assets (million lei)	KPI****	KPI*****	% coverage (over total assets)***)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPIs	Green Asset Rate (GAR) stock	2,558.77*	2.40%*	2.66%*	49.79%	72.83%	45.42%
		Total environmentally sustainable activities (million lei)	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (on flow)	1,038.99	1.60%	1.45%	26.08%	82.36%	32.37%
	Trading book*						
	Financial guarantees	7.14	0.99%	8.79%			
	Assets under management	0.00	0.00%	0.00%			
	Fees and commissions income**						

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Use of estimates and professional judgment

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

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

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

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

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

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

5. Governance of the taxonomy assessment process

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

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

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

6. Limitations

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

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

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

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

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

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

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

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

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

2.2 Climate Change

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

Carbon footprint

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

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

Boundry of the emissions inventory

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

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

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

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

Methodology for calculating emissions

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

1. Defining emission categories

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

Scope 1 – Direct emissions

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

Scope 2 – Indirect emissions from purchased energy

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

For purchased electricity, emissions are reported using two approaches:

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

Scope 3 – Other indirect emissions

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

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

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

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

2. Data Collection and Consolidation

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

The data includes, among other things:

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

3. Application of emission factors

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

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

Sources used for emission factors

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

DESNZ / DEFRA – UK Government GHG Conversion Factors

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

EPA – GHG Emission Factors Hub

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

IPCC Emission Factor Database (EFDB)

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

Eurostat – environmental accounts and emissions statistics

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

Bilan Carbone® (ADEME)

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

ANRE – information on the national energy mix

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

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

EXIOBASE

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

Governance of the emissions calculation and reporting process

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

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

The process includes:

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

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

Evolution of greenhouse gas emissions

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

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

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

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

² See the section “Financed emissions”.

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

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

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

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

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

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

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

Methodological limitations and use of estimates

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

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

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

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

Financed emissions

Methodological Framework

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

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

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

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

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

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

Developments in the PCAF Standard

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

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

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

Scope of application of the methodology

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

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

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

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

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

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

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

Classification of exposures in according with the PCAF methodology

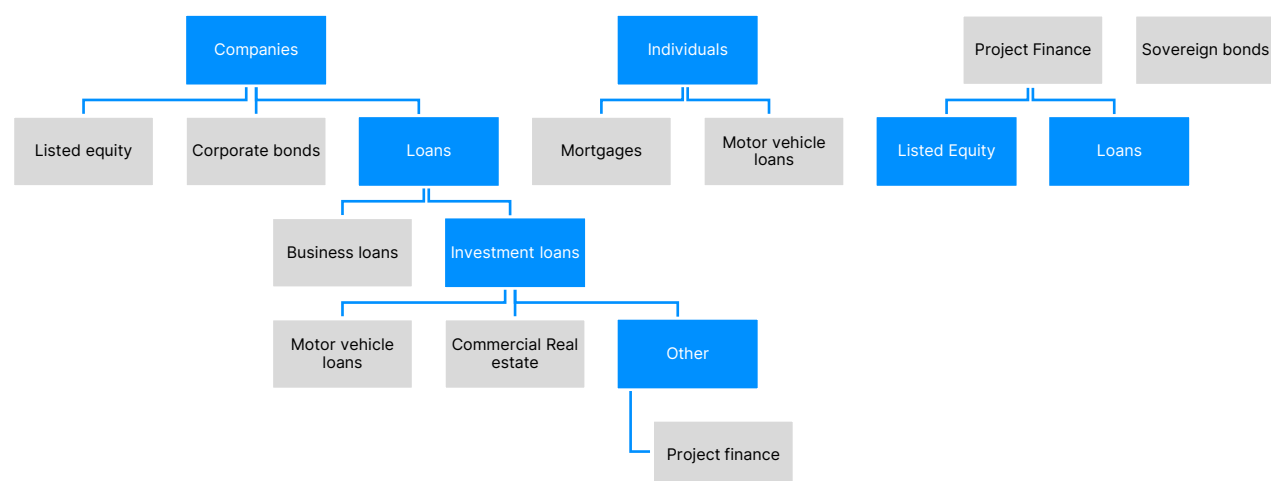
The exposures included in the calculation of financed emissions are classified in accordance with the asset classes defined by the PCAF methodology, depending on the type of financial instrument and the purpose of the financing.

The main categories of exposures analyzed are:

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

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

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



Data sources used

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

Financial data

The financial data used includes:

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

This information is collected from:

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

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

Emissions Data

Emissions data are collected from multiple sources, including:

- companies' public disclosures;
- the Bloomberg platform;

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

Selection of emission factors

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

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

1. Directly reported emissions

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

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

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

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

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

3. Estimated Emissions Based on Economic Activities

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

Methodological update applied starting with the reporting as at 2025

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

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

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

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

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

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

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

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

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

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

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

Determination of allocation factors

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

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

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

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

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

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

Calculation of total emissions

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

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

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

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

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

Calculation of financed emissions

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

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

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

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

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

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

Data Quality Score (DQS)

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

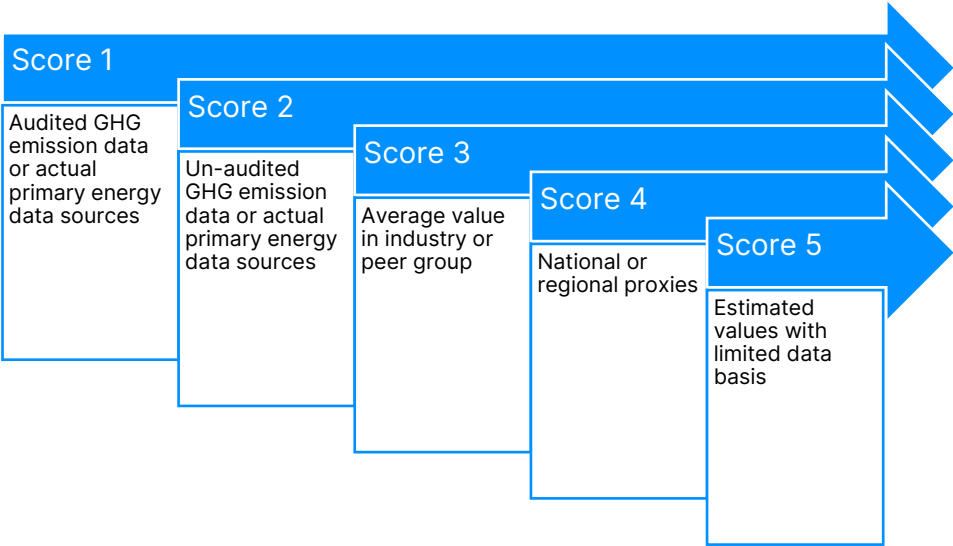
The DQS is expressed on a scale where lower values indicate higher data quality, and higher values reflect the use of estimates based on proxies or sectoral factors. In general, emissions data reported directly by counterparties and independently verified are considered to be of the highest quality,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

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

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

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

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



Assumptions, limitations, and professional judgments

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

Availability and quality of data

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

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

Use of estimated emission factors

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

Assumptions used for certain asset classes

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

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

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

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

Methodological limitations regarding certain types of exposures

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

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

Professional Judgment Applied

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

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

Presentation of Results

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

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

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

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

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

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

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

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

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

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

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

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

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

E1-2 Policies related to climate change mitigation and adaptation

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

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

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

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

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

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

ESG Analysis Workflow

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

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

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

Scope of application of policies and exclusions

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

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

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

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

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

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

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

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

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

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

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

Implementation of the policy

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

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

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

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

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

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

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

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

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

Effectiveness of Policies

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

Climate Risk Analysis

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

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

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

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

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

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

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

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

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

2.3 Circular Economy

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

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

Portfolio-related risks

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

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

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

Risk Assessment and Management

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

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

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

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

Integrating the circular economy into ESG risk analysis

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

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

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

Financing Opportunities

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

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

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

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

Financing the Circular Economy

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

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

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

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

Planned Actions

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

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

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

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

Targets

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

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

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

3. Social Information

3.1 The BT Group Team

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

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

Employee Structure and Characteristics

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

Supporting employees exposed to specific risks

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

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

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

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

Employees Relationship Governance and Policy Framework

Framework Policies

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

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

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

Code of Ethics and Conduct

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

Remuneration Policy

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

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

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

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

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

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

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

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

Relevant commitments regarding human rights policies

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

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

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

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

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

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

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

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

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

Wage Adequacy

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

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

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

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

Remuneration indicators (pay gap and total remuneration)

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

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

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

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

Gender pay gap

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

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

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

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

Total annual remuneration report

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

Entities in the Republic of Moldova

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

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

Republic of Moldova – remuneration indicators

Gender pay gap

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

Total annual pay report

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

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

Policies on employees' skills development

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

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

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

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

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

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

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

Programs for the professional and personal development of the employees

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

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

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

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

Leadership and Management Academy

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

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

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

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

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

Sales Academy

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

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

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

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

Alvolution

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

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

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

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

Learn from Home

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

Webinars developed in 2025:

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

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

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

Gender Equality Policy

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

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

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

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

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

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

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

Incidents, complaints, and serious human rights issues

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

Complaints were received through the following channels:

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

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During the reporting period, the Group did not record:

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

Specific provisions for the inclusion of vulnerable persons

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

Diversity of the BT Group Team

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

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

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

Policies on occupational health and safety

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

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

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

Prevention of Workplace Accidents

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

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

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

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

Health and Safety Indicators

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

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

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

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

Employees Well-being Programs

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

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

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

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

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

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

#GrijăDeTine – Physical Health, Prevention, and Health Education

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

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

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

- *About the Medical Concierge* – Enayati Medical City

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

#BineCuTine – emotional wellbeing, balance, and lifestyle

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

- Urban Camp – program for employees' children

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

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

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

- "Let's Work Smart" – campaign for efficiency and prioritization

Organizational education program aimed to optimize work methods, reduce overload, and adopt sustainable practices in managing daily tasks.

- Video resources and podcasts for emotional well-being:

Recorded educational materials focused on emotional and psychological well-being, such as:

- About Psychotherapy – Regina Maria
- The Code of Men's Health: Body, Mind, and Balance
- Understanding and Overcoming the Midlife Crisis
- Therapy and psychological counseling services for issues related to anxiety, stress, etc.
- Over **134 hours of internal psychological counseling**, supporting the 39 colleagues who requested assistance

- A series of articles and tips on psychology, under the [Wellbeing](#) umbrella, accessible on the bank's intranet (BT Hub).

Recruitment Programs

In 2025, the recruitment process aimed to address both current operational needs and long-term stability and performance objectives. In addition to technical competencies, the selection process emphasized skills such as collaboration, autonomy, customer focus, and adaptability, in line with the specific nature of the bank's business. Initiatives to optimize the experience of candidates and new employees continued, as did efforts to streamline the selection and onboarding processes.

At the same time, the first Employer Branding ad was launched, supported by dedicated external campaigns, which contributed to increasing the visibility of the employer brand and strengthening its positioning in the labor market.

The BT Career Plan

The BT Career Plan is designed to provide clarity and transparency regarding promotion and professional development opportunities within the organization. The program is implemented across the BT network and in relevant departments at Headquarters level, and in 2025 it was accessed by approximately 830 employees.

Internship at BT

- Three internship projects funded by the European Social Fund were implemented:
 - **Two internship projects targeting students:** "Good experiences keep us together" and "From the classroom to the Bank – first steps toward discovering your career." In both projects, scheduled to run through 2027, the goal is for **800 students** from economics and technical faculties across the country to complete internships at BT locations.
 - **An internship program for high school students:** "Internships and Training for Valuable Professionals," where, in partnership with the "Costin Kirițescu" Economic High School in Bucharest, **268 students** are completing internships at BT over a three-year period.
- **Programs for students:** Engineering Summer University, in collaboration with the Technical University of Cluj-Napoca, attended by over **100 students interested in technical programs and projects**; Junior Summer University in collaboration with Babeș-Bolyai University, attended by over **100 students interested in the financial and banking sector**; Global Money Week, attended *by 120 middle school students from Cluj-Napoca*; "Școala altfel," attended **by 130 elementary school students**; and an event dedicated to financial education with over **120 high school students**

interested in economic development, all in collaboration with the County School Inspectorate.

- **BT Bridge** is the initiative through which new colleagues from the Headquarters connect with teams across the network to gain firsthand insight into the reality on the ground: the profile of BT customers, service delivery, the product portfolio, daily challenges, and best practices. At the same time, valuable ideas for improvement are gathered, inspired by the experience of colleagues who work directly with customers.
- **BT Loop:** a pilot project aimed at streamlining recruitment and retention processes for entry-level roles in **the Contact Center** and **Front Office**, initially implemented in **Cluj** and **Bucharest**.
- **The project's objective** is for **shortlisted finalists** to gain direct experience in the work environment: to observe daily activities and operations, and to interact with future managers and colleagues. This allows them to form a realistic picture of the activities and responsibilities before being hired.
- **BT First Step:** an annual event that facilitates candidates' first contact with the banking sector, offering access to relevant information, direct interactions with specialists, and practical experience, as well as a clear perspective on available role opportunities within Banca Transilvania (2025 edition participants – over 350).
- **RATIO Academy**, a project developed in partnership with *the Association of Accounting Students* at Babeş-Bolyai University in Cluj-Napoca, the largest educational camp in the field of economics. As part of the initiative, students from across the country participate in CFA-themed workshops and presentations; **over 80 students and high school students** took part in this project.
- **Business Smart School** is a summer school organized by the Association of Economics Students at Babeş-Bolyai University in Cluj-Napoca, which brings together students from all over Romania interested in entrepreneurship; **over 60 pupils and high school students** participated in this program.
- **MindSpark**, a project organized by StudPAC at Babeş-Bolyai University in Cluj-Napoca, is a summer camp for high school and college students interested in marketing, communication, and advertising, attended by **over 30 students and high schoolers**.
- **The Investment Club** within the Faculty of Economics and Business Administration is a community of passionate students interested in exploring the world of finance and investment. **Over 40 students** participated in the event organized by BT, discussing topics in macroeconomics.
- **Mathias Corvinus Collegium Leadership Training** is the largest private institution for youth education and development in Hungary, with extensive programs in Transylvania as well, where **20 students** visited.

Dialogue with the employees through engagement processes

A structured and ongoing dialogue with our own workforce and employees' representatives is essential for understanding our employees' concerns and needs, for making decisions based on internal feedback, and for integrating their perspectives into organizational processes, thereby contributing to the creation of a fair, safe, and high-performing work environment.

Collaboration with employees

At Banca Transilvania, the Regulations on the Organization and Functioning of the Employees' Representatives define the structure of the employees' representatives and, at the same time, facilitate social dialogue between the employer and employees through these representatives. Drafted in accordance with applicable legislation, the Regulations aim to formalize the rights and obligations of elected and specially mandated employees' representatives, whose mission is to defend and protect the interests of employees.

For the Bank and its subsidiaries in Romania, the employees' representatives are elected at the General Meeting of Employees, with the vote of at least half plus one of the total number of employees. The term of office for the employees' representatives may not exceed 2 years. Any employee of Banca Transilvania with a permanent employment contract, who has been with the company for at least 12 months prior to the date set for the elections and who is not among the company's legal representatives, may run for the role of Employees' Representative, and the candidacy must be submitted in person.

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The most recent employees' representatives elections at Banca Transilvania took place in 2025 and involved voluntary, open candidacies. The employees' representatives were appointed following the votes casted from approximately 6,100 colleagues. 7 candidates were elected as Employees' Representatives.

Employees' representatives serve as the interface between the bank and the workforce and are highly involved in the Bank's decision-making process. The role of employees' representatives is to collaborate with the Bank to identify and implement those solutions that benefit the workforce; consequently, an employee representative is always invited to attend Human Resources Committee meetings.

Among their responsibilities, the employees' representatives are tasked with handling collective bargaining negotiations, ensuring respect for the employees' rights, and defending employees' interests regarding wages, working conditions, working hours, workplace safety, and other professional, economic, and social aspects related to labor relations. They also participate in the formulation of Internal Rules of Procedure. Furthermore, they play a crucial role in consolidating colleagues' proposals and engaging in negotiations with management representatives.

Individuals working within BT Group under mandate contracts are not covered by the Collective Bargaining Agreement.

BT Employee Experience Index

Fostering an organizational environment based on collaboration, respect, and accountability is a strategic priority for BT Group. The goal is to support effective cooperation among employees to achieve shared objectives, encourage engagement in their own professional development, and maintain a work environment characterized by strong professional relationships and genuine opportunities for growth.

For the ninth consecutive year, **the BT Employee Experience Index (BT EEI)** was conducted, an internal survey designed to measure perceptions of the work environment and understand how to improve the day-to-day experience of employees across BT Group companies. The BT Employee Experience Index (BT EEI) is conducted twice a year and has the following main objectives:

- measuring the Employer Net Promoter Score (eNPS);
- measuring the quality of interaction between managers and the team members they lead;
- assessing the extent to which Banca Transilvania's strategy is known to the entire bank team;
- collecting suggestions and recommendations that can increase employees' satisfaction;
- measuring the quality of collaboration with colleagues in other departments, based on frequent professional interactions;
- assessing the level of collaboration with departments within the organization, based on interactions throughout the year.

In the Summer 2025 edition, a new framework for measuring organizational climate was introduced, focused on dimensions with a direct impact on eNPS and employees' motivation. These dimensions are monitored annually to understand what matters most to employees, followed by the definition of concrete actions at both the organizational and team levels to continuously improve employees' experiences within the BT Group.

In the summer edition of the internal BT Employees Experience Index survey, colleagues perceived as models of collaboration, support, and professionalism were recognized based on employee feedback. The study also analyzed the divisions or departments with which employees frequently interact in their daily work, highlighting those units appreciated for their promptness and efficiency in resolving requests.

The participation rate of employees in the BT Group was 85% in the survey conducted between July and August 2025 (compared to 89% in the January-February edition), with over 9,490 responses (vs. 9,213 in January-February) that were analyzed and used to inform a series of decisions aimed at improving the organizational climate.

The results obtained through the BT Employee Experience Index (BT EEI) provided a clear perspective on the employees' expectations and needs, allowing for the adjustment of motivation and retention strategies. Thus, in 2025, Banca Transilvania implemented a series of measures aimed at improving the employees' experience, both in terms of financial benefits and in terms of flexibility and pay equity.

- Indexing the salaries of all employees to the inflation rate for 2024, effective as of February 1, 2025;
- Maintaining the hybrid work schedule, offering the option to work from home 10 days per month for employees in less critical roles.

Mechanisms for reporting and processes for resolving employees concerns

Currently, to manage the potential negative effects generated by gender pay gaps, the company applies a formal methodology for calculating the pay gap. The methodology describes the steps necessary to analyze whether there are pay differences between female and male employees for the same work or for work of equal value, as well as to determine the extent of these differences.

The objective is to identify and quantify the factors contributing to any pay differences. In cases where the pay gap between male and female employees, for each category established internally, exceeds 9% and cannot be justified by objective and gender-neutral criteria, the underlying causes of this difference are analyzed, and measures to reduce it are established within a reasonable timeframe, so as to avoid further imbalances, including with regard to financial and prudential indicators.

The entity also has robust privacy policies in place, which are highly transparent and publicly accessible on its official website. Furthermore, thanks to the rigorous security measures implemented, no data loss incidents have been recorded, thereby ensuring the protection and integrity of the information managed.

Furthermore, to mitigate other forms of negative impact on employees, the company implements essential support measures. Thus, access to psychological counseling is provided for employees affected by burnout, a service that allows them to receive professional support to overcome difficult periods. Additionally, supplementary training sessions are organized, focused on stress management and handling difficult interactions with customers, essential aspects for reducing daily pressure and improving professional relationships. Workload is managed through the balanced redistribution of tasks among employees and, where necessary, by supplementing human resources, with the aim of preventing team overload. At the same time, we aim to optimize processes by digitizing repetitive or administrative activities, some of which are automated through dedicated technological solutions. These measures help reduce operational pressure, streamline operations, and maintain a sustainable work environment that supports employee performance and well-being.

Specific channels for collecting employee feedback

At the Group level, there are clear and accessible channels for reporting concerns and complaints. These mechanisms allow for the identification and resolution of issues in an efficient manner, contributing to the continuous improvement of processes and the maintenance of a fair work environment. Employees have the right to report any treatment deemed discriminatory or behavior that may constitute harassment. In the event of a report, in addition to the complaint filed, the employee may submit multiple pieces of evidence to substantiate the allegations.

Banca Transilvania offers several options for reporting cases deemed to be harassment or discrimination:

- Direct report to the immediate supervisor. If the issue is not resolved at this level, the report is formally escalated to the HR Special Projects & Employee Relations Department, which initiates resolution steps within a maximum of 15 business days.
- Direct report to the HR & Special Projects and Employees Relations Department. The department provides guidance and manages the case procedurally. If necessary, the report is forwarded to the Human Resources Committee, with a decision within 45 business days at the latest.
- Confidential reporting via the dedicated Whistlelink platform:
<https://bancatransilvania.whistlelink.com> – a secure channel, recommended when there are concerns about possible repercussions.

For more complex issues or those requiring an official approach, there are well-defined formal mechanisms that follow specific steps: filing a written complaint, case report, investigation, and resolution of the complaint.

To conduct detailed and objective investigations, a Preliminary Disciplinary Investigation Committee is established, consisting of at least 3 voting members who are impartial and objective. When appointing the committee responsible for receiving and resolving harassment cases, the following criteria are taken into account: gender balance, specifically equal representation of women and men, as well as the ethical and professional conduct of the individuals designated to serve on the committee that will analyze the harassment case. The investigation committee may not include persons directly or indirectly involved in the reported events. The outcome of the investigation is recorded in the minutes of the designated committee and submitted to the competent decision-making body, which determines whether or not sanctions are warranted. Based on this decision, the authorized human resources department issues, if applicable, the disciplinary decision within 30 calendar days of the minutes being recorded (but no later than 6 months from the date of the incident), and the employee is notified within 5 calendar days of issuance. If no sanction is imposed, the decision includes appropriate provisions.

Group employees may also submit reports through external channels under the conditions provided by law. In this case, reports are submitted using the channels made available to

them by the competent authorities responsible for receiving such reports and taking subsequent action (e.g., the National Bank of Romania, the Financial Supervisory Authority, the National Integrity Agency).

Currently, the Group does not conduct a formal process to assess employees' level of trust in these structures and processes as a means of expressing their concerns or needs. The implementation of a dedicated mechanism to measure the perception and degree of these channels usage is being considered as part of future processes to strengthen internal governance practices.

Existing reporting mechanisms are communicated via the intranet, internal policies, and ad hoc notifications to ensure an adequate level of information and accessibility for employees.

The BT Group's subsidiaries have implemented specific measures to ensure a work environment based on equal opportunity and free from harassment. The Internal Order Regulation for each subsidiary include a chapter dedicated to the equal opportunity and anti-harassment policy. Additionally, each subsidiary either has its own reporting channel or has access to the Bank's "Whistlelink" and "My Alert" channels.

In light of specific legal regulations, reports received directly from employees of the subsidiaries BT Asset Management SAI and BT Capital Partners or from other individuals, regarding violations of the law within the aforementioned entities, are redirected to their respective reporting channels, namely MyAlertBTAM@btam.ro and myalert@btcapitalpartners.ro, to be handled in accordance with the applicable Internal Rules of Procedure.

Protection Against Retaliation

The policy on protection against retaliation for individuals using the reporting channels is included in the internal reporting procedure and complies with applicable law. In this regard, throughout the reporting procedure, as well as after its resolution, any form of retaliation, threats of retaliation, or attempts at retaliation against individuals who have filed a report is strictly prohibited, in accordance with the provisions of Law No. 361/2022. The Group is committed to protecting the integrity and rights of all individuals who raise concerns or needs through these channels, ensuring a safe and fair environment for them to express themselves.

Employee-focused initiatives and monitoring of their outcomes

Managing the impact on employees: action plans and mitigation measures

The Group systematically analyzes issues relevant to its workforce, including working conditions, health and safety, pay equity, and discrimination prevention, using internal tools such as surveys, audits, and reporting mechanisms. Based on the findings, improvement measures are adopted, aimed at optimizing working conditions, updating pay policies, and strengthening employees' reporting and protection channels. The progress of these initiatives is tracked through performance indicators, internal feedback, and periodic assessments, providing insight into the effectiveness of the implemented measures and the level of employees' satisfaction.

Responsibility toward employees entails a constant assessment of how the organization's activities influence their work environment and professional experience. Addressing and managing challenges arising in the relationship with the BT Group team takes the form of actions designed to support well-being, professional development, and a balanced work environment for all team members:

- **Salary adjustments in line with inflation:** In February 2025, BT implemented a significant measure to ensure the financial well-being of its employees by indexing salaries in accordance with the inflation rate for 2024.
- **Investments in non-salary benefits:** BT recognizes the importance of a comprehensive benefits package for employees, including not only salaries but also private health insurance and voluntary pensions.
- **Workplace safety and well-being:** BT places a strong emphasis on reducing the risk of accidents by implementing comprehensive safety and well-being programs. A notable example is the wellbeing program, which focuses on mental and physical health prevention and was developed based on a detailed report identifying specific risk factors according to gender, age, and prevalent medical conditions.
- **Stress and burnout prevention:** Balancing workloads and providing psychological support are priorities for BT, which recognizes the negative impact of stress, and burnout on employees' productivity and satisfaction. Support programs are designed to provide employees with the resources needed to effectively manage daily pressures.
- **Career Continuity and Development Plans:** Reducing staff turnover and fostering continuous employees' development are essential for BT. Development programs, such as "Be the Manager" and the "Leadership Program," provide managers with the tools needed to excel in their roles, contributing to the creation of a strong organizational culture and a solid talent base.
- **Skill development through continuous education:** BT invests in the continuous training of employees through courses, workshops, and access to online learning

platforms. Initiatives such as “Școala Altfel” at BT underscore the company’s commitment to financial education, extending it to the community as well.

- **Internal mobility programs:** The BT Career Plan and initiatives such as BT Bridge are designed to offer employees opportunities to explore new roles and responsibilities, promoting a culture of internal growth and professional satisfaction.
- **Process automation and digitization:** Efforts to automate and digitize processes are crucial for BT, allowing employees to focus on value-added tasks and improve operational efficiency.

The effectiveness of actions and initiatives implemented for its workforce is monitored and evaluated through a structured process based on the collection and analysis of relevant data. Monitoring is carried out using specific performance indicators (KPIs) such as: employees satisfaction level, eNPS (Employee Net Promoter Score), staff turnover rate, and compliance with occupational health and safety standards. Effectiveness is assessed through feedback sessions with employees, as well as through internal audits to verify compliance with the implemented measures. Furthermore, analyzing long-term trends and comparing results with established objectives allows for the continuous adjustment and improvement of policies and initiatives. All these mechanisms ensure a proactive approach, designed to maintain a safe, fair, and motivating work environment for all employees.

Management of Labor-Related Risks and Opportunities at Banca Transilvania

Within BT Group, the management of relevant workforce-related risks contributes to maintaining operational continuity and efficiency. In this context, actions aimed at mitigating risks related to skills, training, and professional development are constantly implemented.

The Group supports the continuous development of employees through training programs designed to strengthen the skills needed to adapt to new technologies and processes, as well as through sessions dedicated to developing technical and leadership skills, with the aim of ensuring a prepared and flexible team.

These initiatives help maintain a high level of operational performance and the organization’s ability to respond effectively to changes in the business environment, reducing risks associated with workforce dependency.

To capitalize on opportunities for growth and innovation, the Group implements extensive professional development programs, which include specialized training, mentoring, as well as upskilling and reskilling initiatives tailored to market needs. Competitive benefits packages are also offered, designed to support employees’ well-being and motivation. In parallel, organizational development initiatives are underway, aimed at optimizing internal processes and strengthening an organizational culture based on collaboration, performance, and innovation.

Resources Allocated for the Employees Development

The Group allocates a significant annual budget to the Human Resources function to implement measures aimed at sustaining the positive outcomes for employees and mitigating any negative effects arising from material impacts. The related expenses are reflected in the 2025 Financial Statements, in the Consolidated Income Statement under “Personnel Expenses”, representing approximately 43% of total consolidated operating expenses.

Targets and commitments

The Group aims to strengthen workforce stability and development through clear objectives regarding recruitment, retention, training, and diversity. The main priorities focus on diversifying recruitment, reducing turnover in critical roles, developing skills, promoting a fair work environment, and monitoring organizational balance.

Progress toward these objectives is continuously monitored using specific key performance indicators (KPIs):

- An eNPS of at least 50 and a rate of participation in training programs of at least 70% – for 2025 the eNPS was 59 correlated with a participation rate in the survey conducted between July and August 2025 of 85% (89% in the January–February 2025 edition), with over 9,490 responses (9,213 in January–February), confirming the employees’ interest in professional development programs.
- A minimum of 40 hours of training per year per employee, excluding on-the-job training – the target was exceeded, with the annual average reaching 55 hours of training per employee, reflecting the consistent investment in professional skills development.
- Involvement of at least 70 students in internship programs – the target was met, with over 300 students participating in internship programs, benefiting from practical experience and mentoring from the bank’s teams.
- Conducting volunteer activities and CSR initiatives – throughout the year, volunteer programs and social responsibility initiatives were continued and expanded, with employees participating in numerous community, educational, and social activities held nationwide.
- Monitoring gender balance, age, and diversity at the organizational level – the bank continued to monitor diversity indicators and promoted an inclusive work environment through internal initiatives and human resources processes that support gender balance, generational diversity, and equal opportunities.

The setting and adjustment of objectives are based on the results of internal surveys, periodic assessments, consultations with the employees' representatives, and comparative analysis with industry practices, as well as an annual review based on performance and market conditions.

3.2 Customers and users of the BT Group's products and services

Significant impacts, risks, and opportunities and their connection to the strategy, business model, and customer and end-user segments

The Group's business model is based on providing financial products and services to consumers and end users, individual and corporate customers, and their needs directly influence the strategy, operational structure, portfolio development, and service delivery.

Individuals who use the Group's services and products, such as checking and savings accounts, deposits, consumer loans, and mortgages, as well as savings and investment instruments, represent a significant segment of the portfolio. These services enable them to save, invest, or access financing for home purchases, thereby contributing to their financial stability and security. Their characteristics and expectations are integrated into the development process of financial products, digital platforms, and interaction channels.

The corporate client segment complements the Group's portfolio through a diverse range of financial products and services, including financing solutions, cash management, and trading. Special attention is also given to small and medium-sized enterprises, which use the Bank's services for financing, consulting, and risk management solutions, thereby contributing to local economic growth and supporting access to financing and development for this category of clients.

Activities dedicated to corporate clients are organized into four business lines: large corporate, mid-corporate (Mid-Co), SMEs, and microenterprises (micro). Large corporate and Mid-Co clients include large companies that use the Bank's financial products to manage their cash flows, access financing to expand their business, or invest in new growth opportunities. By offering tailored financial solutions, the Bank supports the development and consolidation of economic activities at the corporate level.

SME and micro customers represent a strategic segment, playing an essential role in the local and global economy. They require flexible financial solutions, such as working capital loans, lines of credit, equipment financing, or real estate loans for the purchase of commercial spaces. By ensuring access to financing and promoting financial inclusion, the Bank contributes to the growth and sustainability of these businesses, facilitating the development of the entrepreneurial environment.

Transparency and clarity in the contractual terms and conditions of the Group's products and services are essential to our relationship with customers, helping them to correctly understand the associated features, costs, and risks. Accessible and comprehensive communication supports informed and responsible financial decision-making. In this context, special attention is given to certain categories of customers who may be more financially vulnerable. These include low-income individuals, retirees, young people with no financial experience, the rural population, or those at risk of financial exclusion. These groups may face difficulties in understanding more complex financial products or managing

their financial obligations, which can increase the risk of over-indebtedness or making unfavorable financial decisions.

To mitigate these risks, the Bank employs mechanisms such as promoting financial education, enhancing the transparency of the information provided, and complying with the applicable regulatory framework, ensuring fair, responsible, and tailored interactions with vulnerable customers.

Material adverse effects on customers

Among the financial products and services offered by BT Group entities that may have negative effects on customers are variable-rate loans, which can become more expensive in the context of market fluctuations, as well as high-risk investment products, which can lead to financial losses. Furthermore, certain more complex financial products require an adequate level of understanding on the part of users. In the absence of proper information and assessment, some credit products can lead to over-indebtedness or repayment difficulties, particularly during periods of economic instability.

Thus, transparency regarding information on financial products and services is an essential element in the relationship with customers. Total costs, fees, and associated risks are presented in clear and accessible language so that customers can make informed financial decisions and avoid taking on obligations they do not fully understand.

In providing its services, the Bank processes financial data and personal information, which may give rise to risks related to data privacy and security. Unauthorized access, misuse of information, or cyber attacks can affect customers' financial security and their level of trust in the services provided. To mitigate these risks, technical and organizational cybersecurity measures are implemented, along with clear data protection policies.

Activities with a positive impact on BT Group customers

The Group plays an important role in the Romanian economy through its financing activities for individuals and companies. Through loans provided to entrepreneurs, SMEs, large companies, and the general public, the Bank contributes to supporting investment, consumption, and business development, and through financing programs tailored to the diverse needs of customers and strategic partnerships, it plays an active role in stimulating investment, innovation, and financial inclusion, thereby strengthening the resilience and competitiveness of the national economy.

At the same time, the Group promotes inclusive financial products, such as fee-free bank accounts for low-income individuals or financing solutions for early-stage entrepreneurs, thereby facilitating access to financial services for groups that may face barriers in their relationship with the banking system. Financial education is a complementary component, through programs dedicated to personal budget management, preventing over-indebtedness, and understanding financial products.

The Group also supports SMEs through financial solutions tailored to their needs and develops products with a sustainability component, including green loans designed to finance projects with environmental benefits.

Material risks and opportunities

Insufficient access to clear information or to appropriate financial products and services may affect customer relationships and the performance of the loan portfolio. When the costs, terms, and risks associated with products are not communicated in an easily understandable manner, customers may make inappropriate financial decisions, which can lead to repayment difficulties and a deterioration in the quality of the loan portfolio, negatively impacting the Group's profitability.

Furthermore, financial or digital barriers may limit access to banking services for certain groups of people, particularly in rural areas or among those with limited digital skills. Such situations can lead to dissatisfaction and affect customer trust, increasing the number of complaints, with potential reputational consequences for the Group.

To mitigate these risks, the Group offers financial education programs, invests in digitalization and interactive platforms, and uses clear language in contractual communications. At the same time, the development of mobile applications and flexible financial products helps attract new customers and increase service usage.

No material risks or opportunities have been identified that distinctly affect certain consumer groups. However, vulnerabilities are recognized among older adults, who may face difficulties using digital channels, and among young people with limited financial experience, who are at risk of over-indebtedness. For these segments, the Group develops tailored products and solutions, including financing with flexible terms or programs dedicated to specific customer categories.

Policies Regarding Consumers and End Users

Policies for managing material impacts, risks, and opportunities related to consumers and end users

Policies regarding the protection of consumers and end users are structured around four main areas, each designed to ensure a regulated and effective framework for customer safety and rights, as well as for the smooth conduct of banking activities.

Through these strategic directions, the Group aims to create a safe, transparent, and inclusive financial environment, thereby strengthening consumer confidence in the services provided.

Depending on the regulated area, all documents and internal frameworks applicable to consumers and end-users may be valid at both the Bank and Group levels, having been approved by the CEO or the responsible department heads. These policies are accessible to employees via the Bank's intranet and are published on the official website. For Group's subsidiaries, these documents are published on their platforms.

Pillar I: Lending

The first area is lending, where customers are protected by the General Terms and Conditions, applicable to both individuals and legal entities. This document establishes the general framework of the relationship between the Bank and its customers and includes information regarding the products and services offered, associated costs, as well as the rights and obligations of the parties, ensuring transparency and compliance with the applicable regulations.

The lending process is governed by internal procedures tailored to different customer segments (e.g., Internal Lending Policy for Individuals, Lending Procedure for Corporate Clients, etc.), which establish eligibility criteria, lending conditions, and control mechanisms to ensure a responsible and consistent lending process.

Pillar II: Cybersecurity

The second area of focus concerns information security, a critical domain for protecting the Bank's operations, employees, and customers. To this end, the Bank has implemented a framework comprising 28 internal rules that establish organizational and technical requirements to ensure a secure operating environment. These define the objectives, principles, roles, and responsibilities in accordance with applicable external regulations.

Through this framework, the Bank aims to prevent incidents that could affect the confidentiality, integrity, and availability of data, thereby contributing to strengthening operational resilience and maintaining customer trust.

For further details, see section 3.6 Cybersecurity and Personal Data Protection.

Pillar III: Responsible Marketing Practices

The third area of focus concerns ensuring access to clear information and promoting responsible marketing practices, which are essential for maintaining a relationship based on trust with the BT customers. To this end, the Bank implements measures and procedures to continuously assess customers' experience and satisfaction levels regarding the offered products and services.

A central tool in this effort is the procedure for measuring customer perception of service quality, which establishes methods for collecting and analyzing feedback. Through this process, both the quality of products and services and the interactions between customers and employees are evaluated. Analysis of the results allows for the identification of areas for improvement and the adoption of measures to continuously optimize our customers' experience.

Pillar IV: Confidentiality

The fourth relevant area at the level of BT Group concerns compliance with legislation on the protection of personal data. In accordance with the General Data Protection Regulation and the applicable legislative framework, the Bank and the Group entities have implemented Internal Rules of Procedure and control mechanisms that ensure compliance with legal obligations and the adequate protection of processed data.

Personal data protection is an essential element of financial and banking activities, given that such data includes confidential information subject to professional secrecy. The measures adopted are complemented by the Bank's cybersecurity framework, which helps prevent unauthorized access, loss, or misuse of data.

For further details, please refer to Section 3.6 Cybersecurity and Personal Data Protection.

International Standards and Regulations Implemented by the Bank for Customer Safety

Banca Transilvania operates in accordance with a rigorous set of international standards and legal frameworks designed to ensure the protection of consumers and end-users of banking services. By implementing these regulations and guidelines, the Bank reinforces its commitment to financial security, data protection, human rights, and corporate social responsibility. The adopted standards ensure a stable and secure environment for customers, partners, and employees, contributing to increased transparency, resilience, and trust in the financial system.

1. MiFID II – Investor Protection and Financial Market Transparency

BT operates in accordance with the Markets in Financial Instruments Directive (MiFID II), a key European legal framework related to investors' protection and an increased transparency of financial markets. MiFID II regulates investment and trading services, with the following main objectives: investors' protection, improving market transparency, and

ensuring fair and ethical practices in the interaction between financial institutions and clients. In its operations, the Bank complies with MiFID II requirements, guaranteeing its clients secure, transparent financial services that meet the highest standards of investors' protection.

2. PSD2 – Enhanced Security and Innovation in Digital Payments

BT strictly applies the Payment Services Directive (PSD2), which redefines the standards in the field of electronic payments and banking transactions' security. This regulation improves consumer safety and promotes innovation in the financial sector. The bank has integrated PSD2 requirements into its digital platforms, ensuring customers secure, fast transactions that comply with the European regulations.

3. EBA Guidelines – Stability and Security in the European Banking Sector

The European Banking Authority (EBA) imposes a set of mandatory guidelines for all financial institutions in the EU, ensuring their stability, security, and resilience. BT complies with the EBA Guidelines, applying rigorous risk management measures in the areas of cybersecurity and data protection, as well as high standards of ethics and compliance, designed to protect the consumers' interests. By directly applying these principles, BT protects its customers against financial and cyber risks, thereby strengthening trust in banking services.

4. DORA – Operational Resilience in the Digital Age

The Digital Operational Resilience Act (DORA) is a key regulation for strengthening the operational resilience of financial institutions in Europe.

5. Principles for Responsible Banking – Sustainability and Ethics in the Banking Sector

BT is committed to adhering to **the Principles for Responsible Banking (PRB)** to align the banking sector with **sustainable development goals**. To this end, BT:

- Integrates sustainability criteria into its business strategy;
- Promotes responsible financing and ethical investments;
- Supports initiatives that contribute to environmental protection and community development.

6. CRR/CRD – Prudential Requirements and Risk Management

The Capital Requirements Regulation (CRR) and the Capital Requirements Directive (CRD) form the cornerstone of the banking supervision framework in the European Union. Banca Transilvania complies with the provisions of the CRR/CRD, ensuring that adequate levels of own funds are maintained to cover significant risks, and managing credit risk, market risk, operational risk, and interest rate risk, in accordance with the relevant CRR articles and the implementation of CRR3/CRD VI requirements, including the incorporation of ESG risks into the prudential framework, in line with the new European mandates on sustainability. This

framework strengthens the institution's financial stability and protects customers by maintaining a solid capital level through proactive risk management.

7. BRRD – The European Bank Recovery and Resolution Framework

BT applies the provisions of the Bank Recovery and Resolution Directive (BRRD), which are essential for protecting depositors and ensuring the continuity of banking services in severe situations. The alignment with BRRD requirements includes: clear mechanisms for the conversion or write-down of capital instruments in the event of resolution, and the harmonization of procedures with national legislation transposing the BRRD. By implementing the BRRD, BT contributes to maintaining confidence in the financial system and protecting customers' interests under stress conditions.

8. Pillar III – Transparency and Disclosure of Prudential Information

The Group periodically publishes comprehensive information regarding its risks, capital, and prudential profile, ensuring maximum transparency for investors and consumers. Pillar III reporting is carried out in accordance with: Reg. (EU) 2021/637, which establishes the format and content of financial institutions' disclosures; CRR requirements regarding credit risk adjustments, exposures, capital, and indicators (Art. 435–448); and applicable EBA updates. The consistent application of these requirements contributes to increased transparency and confidence in the bank's operations.

9. EBA Guidelines on ESG Risk Management – Integrated ESG Risk Management

The Bank applies the European guidelines on ESG risk management developed by the EBA, which include requirements regarding:

- the integration of environmental, social, and governance risks into the overall risk framework;
- assessing short-, medium-, and long-term risks, including in the context of the energy transition;
- participation in the climate scenario analysis coordinated by the EBA, as part of the European Fit for 55 exercise, in which Banca Transilvania was the only Romanian institution included in the analyzed sample.

The implementation of these guidelines supports the Bank's alignment with European sustainability standards and contributes to protecting customers through robust management of emerging risks.

Engagement and consultation with consumers and end-users

The Group adopts a well-defined and diversified strategy to ensure effective and continuous communication with consumers and end-users, with the primary objective of understanding their needs, concerns, and expectations regarding financial products and services.

At the Bank level, to maintain a constant dialogue with customers, several feedback collection mechanisms are used. These include the Net Promoter Score, based on responses from customers who have interacted with the Bank's branches, as well as indicators that assess the quality of interaction between customers and Bank representatives.

Customers can submit suggestions and complaints through various channels, including mobile apps, [the website](#), physical branches, social media, and the Call Center.

The Bank also analyzes data on product usage and complaints received to identify potential issues and continuously improve the products and services it offers.

Measures implemented to address or mitigate negative impacts on human rights regarding customers

To prevent and address any negative effects on the rights of consumers and end-users, measures are implemented to ensure transparency, customer protection, and the efficient resolution of issues that arise.

In the event of complaints regarding lending practices, fees, contract terms, the provision of information, access to services, or data protection, customers have access to dedicated mechanisms, including call center support services and official digital channels for submitting requests and complaints. At the same time, there is ongoing collaboration with relevant authorities and mechanisms, such as the National Authority for Consumer Protection, the Center for Alternative Disputes Resolution in the Banking Sector, the National Bank of Romania, the National Supervisory Authority for Personal Data Processing, as well as with courts and mediation mechanisms, to ensure compliance and the fair resolution of any disputes.

Given the specific nature of banking activities, the prevention of risks associated with human rights violations is supported by compliance policies, governance mechanisms, and appropriate due diligence processes.

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During the reporting period, no cases of human rights violations were identified in relation to customers or in relation to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, to the extent that these are relevant to the business conducted.

Mechanisms for Engaging Consumers and End Users in Impact Management

To assess how its products and services are perceived, the Bank collaborates with customers through regular consultations and analyses conducted with the support of external consultants. Independent studies are used to measure customer satisfaction and

customer experience. The results of these analyses allow for a comparison of satisfaction levels with the market average and provide insight into the Bank’s positioning relative to other industry participants.

In the retail segment, the Bank ranks first among traditional banks, maintaining the upward trend of the past three years. In 2025, Banca Transilvania also took the topped the Romanian banking market in terms of customer satisfaction. Studies show that, at the market level, the most appreciated aspects are the products and services offered, followed by the interaction with employees and a focus on customer needs. In case of BT, customers place particular importance on product quality, staff professionalism, and infrastructure, aspects that positively distinguish the Bank from the market average. These results are used to adjust strategies and continuously improve our customers’ experience.

In the corporate segment, the Bank ranks second, with an NPS score of 52, compared to 53 for the top-ranked institution. Similar to the retail segment, customers primarily value the products and services, the interaction with employees, and the ability to meet their needs. Regarding digital applications, nearly half of respondents believe they’ve already met their needs and expectations, and suggestions focus on expanding functionality and simplifying usage.

In addition, the Bank collaborates with relevant organizations and institutions to strengthen consumer protection and improve access to financial services. These include the Romanian Banking Association, within the framework of initiatives dedicated to financial inclusion and education, as well as financial regulatory and supervisory authorities.

Through these collaborations, the Bank contributes to initiatives and consultations aimed at increasing the transparency and security of banking services.

Aspect	Description	
Stage of collaboration	Collaboration with consumers and end-users takes place throughout the process of developing and optimizing financial products and services. This includes identifying customer needs and expectations, testing and validating financial solutions, and implementing and improving them based on feedback received.	
Type of collaboration	Periodic satisfaction surveys	quarterly/annually
	Focus groups with different consumer segments.	Periodically, upon the launch of a new product
	Independent market research conducted by external consultants.	Periodically

	Collaboration with regulatory authorities and independent consumer protection organizations.	Periodically
Results and impact	We analyze customer satisfaction and compare it to market benchmarks. We measure perceptions of collaboration with BT and the macroeconomic context.	
Responsible function	The Customer Experience & NPS Department, which ensures the implementation of initiatives to improve customer experience The Complaints Department ensures the timely resolution of complaints and reports received from customers.	
Engagement effectiveness	Net Promoter Score (NPS), measures customer loyalty and the likelihood of recommending the Bank to others.	
	Customer Effort Score (CES) reflects the effort perceived by customers in their interactions with the Bank.	
	Human Interaction assesses the quality and efficiency of direct interactions with the Bank staff.	
	Complaints' resolution time measures how quickly and efficiently the Bank responds to and resolves the customers' concerns.	

Integration of customer feedback into the processes of developing and updating products and services

The Policy on Product Approval, Launch, and Modification, adopted at the level of the Deputy CEO - Retail Banking and the Deputy CEO of SME & Mid-Corporate, provides the framework for product development and updates. This process aims to integrate the results of analyses into the overall strategy and address issues identified during the development phase.

As part of the process, potential risks are assessed and mitigation measures are established through a structured analysis of commercial, operational, and compliance implications. The effectiveness of the measures adopted is constantly monitored, and adjustments are made when necessary.

The process of analysis, approval, implementation, and launch is organized into clear stages, which helps align products with market requirements and the Bank's strategic objectives.

Modifications to an existing product may occur due to various factors, including:

- The identification of unmet needs among existing or potential customers, or the emergence of new market requirements that necessitate adjustments to the Bank's products or services.
- The emergence of market opportunities that justify optimizing products to respond more effectively to demand and the competitiveness of the banking sector.
- The possibility of offering new lending facilities to customers following the conclusion of specific contracts or agreements with guarantee-specialized institutions, such as FNGCIMM or the EIF.
- Access to external financing or European funds, which may enable the development of new products and services or the adaptation of the existing ones to meet the eligibility and usage requirements for these funds.
- Group-level synergy objectives, through which the Bank aims to integrate and optimize its services in line with the overall strategy of the BT Financial Group.
- The need to comply with legislative or strategic requirements, which require product adaptations to comply with current regulations and maintain market competitiveness.

Proposals for launching or modifying products may come from any Bank's employee, regardless of their position, whether they work in a regional office, a branch, or at Headquarters. These suggestions may be submitted in various forms - documents, emails, phone calls, or through other communication channels - and must be directed to the Divisions/Departments responsible for managing those products or to those managing the relationship with the customer segment targeted by the product in question.

In case there is a modification to an existing product or service, it is mandatory to provide a written notification and involve the relevant Divisions/Departments from the initial phase, so that the process is managed efficiently and in accordance with Internal Rules of Procedure. This rigorous process ensures a comprehensive risk assessment, optimal integration into the Bank's products portfolio, and full transparency in communicating changes to stakeholders.

Assessment of the customer engagement processes effectiveness

The effectiveness of customer engagement processes is assessed through the constant monitoring of performance indicators such as the Net Promoter Score and Customer Effort Score, which reflect the level of satisfaction and the overall experience of consumers and end-users.

In addition to these indicators, the way complaints and grievances are managed plays an important role, as it provides direct insight into areas requiring improvement. The bank has implemented a structured framework for resolving complaints, focused on transparency, respecting the rights of complainants, and providing clear and reasoned responses within the timeframes prescribed by law.

The time taken to resolve complaints is tracked as a performance indicator. For complaints not related to payment services, the maximum response time is 30 calendar days from receipt, and for those regarding payment services, the response is provided within a maximum of 15 business days, with the possibility of extending this to 35 business days in exceptional circumstances. Monitoring these deadlines contributes to the continuous improvement of processes and the strengthening of customer trust.

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KPI for Complaints and Complex Requests:

Average Resolution Time (calendar days) - 7 days

→ % Resolution rate 2025 <=7 days – 68%

→ % resolved by 2025 <= 14 days – 83%

Complaints' management is handled by a specialized unit, the Complaints Management Department within the Contact Center & Customer Care Division, which analyzes and resolves each complaint individually. This unit monitors the entire process, collaborates with other departments to identify optimal solutions, and implements corrective measures to prevent similar issues in the future.

In 2025, the experience of the customers who chose to interact with the bank through the Contact Center was constantly monitored, with a focus on service quality and the efficiency of request resolution. Thus, the post-interaction experience was evaluated using standardized quantitative indicators. The results obtained highlight a high level of satisfaction and an increased capacity for efficiently resolving requests.

The post-interaction satisfaction score (**CSAT**) reached **91%**, indicating customers' positive perception of the quality of interactions and how their requests were handled.

At the same time, the **First Call** Resolution (**FCR**) rate was **92%**, reflecting the efficiency of operational processes and reducing the need for repeated customer contacts.

Processes for engaging with consumers and end-users regarding impacts

Channels available to customers for feedback and complaints

Effective management of feedback and complaints is an important tool for improving customer relationships and quickly correcting any malfunctions. Access to clear and transparent reporting channels allows for the identification of issues and the adoption of necessary measures in a structured manner.

To ensure impartiality and prevent conflicts of interest, complaints involving an employee or contractor of the Bank cannot be resolved by the person in question or by a direct subordinate of that person. If an employee receiving a complaint identifies a potential

conflict of interest, they must inform the Complaints Management Department and their supervisor and refrain from taking any action regarding the complaint. If the complaint involves members of Banca Transilvania's management team, it is escalated to the unit responsible for managing compliance risk and conflicts of interest.

Customers may submit complaints through various channels made available to them, including dedicated email addresses, letters addressed to the Bank, via the Bank's website or that of each subsidiary, through social media, or in person at the Bank's headquarters or any branch.

Entity	Channels for reporting issues/complaints
Banca Transilvania	dpo@btrl.ro gdprsuport@btrl.ro myalert@btrl.ro https://bancatransilvania.whistlelink.com/ investor.relations@btrl.ro sesizariesg@btrl.ro conflictinterese-conformare@btrl.ro contact@btrl.ro Secure messaging - BT PAY Web Internet Banking Contact Center: 0264 308 028, *8028, social media: Facebook in person, at any BT branch/agency, in writing, via a letter submitted at any BT branch/agency or sent to the BT headquarters at 30- 36 Calea Dorobantilor, Cluj Napoca, 400117
BT Direct IFN	contact@btdirect.ro
BT Microfinanțare IFN	dpo@btmic.ro
BT Asset Management	MyAlertBTAM@btam.ro conformare@btam.ro
BT Capital Partners	myalert@btcapitalpartners.ro
BT Leasing Transilvania IFN	Call Center: 0264303283 aplicația BTmyLeasing

Improvement Credit Collection	office@iccollect.ro reclamatii@iccollect.ro
BT Pensii S.A.F.P.F.	reclamatii@btpensii.ro
BRD S.A.F.P.P.	reclamatii@btpensiplus.ro
BT Leasing Modova	contact@btleasing.md Departament Client Service: +(373 22) 260 790 +(373 22) 260 780
BT Broker de Asigurări	dpo@btleasing.ro
Fondul Imobiliar de Investitii Alternative BT Property	btbuilding@btrl.ro
Salt Bank	SALT: (*7258) sau 037 381 19 13; In-app chat; Self-service (FAQs) Direct call from the app. Offline message in the app.
Victoria Bank	Customer Support at 1303 (0 30 30 30 00); at a branch/agency
OCN Microinvest	sesizari@microinvest.md hot line: 022 802 100 Call-Centre: 022 801 701

Processes through which the company supports or requests the availability of channels

In the field of payments processing and digital services, Banca Transilvania acts in two distinct roles: as a card issuer and as a payment acquirer. As an issuer, the Bank offers cards and related services to individuals and businesses, enabling them to make secure payments and transactions both domestically and internationally. As a payment acceptor, the Bank provides merchants with solutions for accepting card payments, either through physical POS terminals or online payment platforms.

For both types of services, customers and business partners have access to dedicated channels for submitting complaints and requests, including at the bank branches, through

the Call Center, and via email, thereby ensuring a clear and efficient process for handling complaints.

Penalties and fines for non-compliance with laws and regulations regarding the provision and use of financial products and services

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In 2024 and 2025, there were no environmental fines or penalties.

Penalties and fines for non-compliance with laws and regulations regarding the provision and use of financial products and services

During the reporting period, Banca Transilvania and the entities within the BT Group recorded a limited number of fines and non financial sanctions as a result of inspections carried out by the competent authorities, as well as complaints submitted through alternative dispute resolution mechanisms. At the Bank level, in 2025, a small number of fines were imposed, with an immaterial cumulative financial impact, together with non financial sanctions and warnings, mainly related to operational or procedural matters.

In addition, the Bank was subject to inspections conducted by the National Authority for Consumer Protection (ANPC), following which administrative sanctions were applied, reflecting the intensity of supervisory activity across the banking sector. These situations did not indicate systemic deficiencies and did not have a significant impact on the Bank's operational or financial stability.

At BT Group level, the volume of litigation pending before the courts is correlated with the scale and nature of the activities carried out. For the main entities, the majority of cases are derived from loan agreements, while non credit related litigation represents a limited impact. A significant proportion of the cases concluded were resolved in favour of the BT Group entities, with particularly high success rates for subsidiaries primarily engaged in lending activities. For certain BT Group entities, no fines or sanctions were recorded for non compliance with legislation governing the provision and use of financial products and services during the reporting period.

At consolidated level, compliance, internal control, complaints handling and litigation management processes are continuously monitored and enhanced, with the aim of reducing legal and reputational risks and ensuring compliance with the applicable legal framework and the protection of consumers' rights.

Measures to manage significant impacts, risks, and opportunities in customer relations

In its customer relationships, the Group implements measures to manage identified impacts, risks, and opportunities, aiming to maintain an adequate level of protection and trust. To this end, actions are implemented to improve access to services, increase transparency, and continuously adapt products to the needs of different customer segments.

Development of inclusive financial products

Equitable access to financial products and services is essential for an inclusive and resilient society. When all social groups can use financial instruments that are secure and tailored to their needs, a solid foundation is laid for sustainable economic development. Expanding financial access reduces social disparities, supports entrepreneurial initiatives, stimulates economic mobility, and encourages innovation in the financial sector, thereby contributing to collective well-being.

The Group offers its customers a range of solutions designed to support Romanian individuals and entrepreneurs, regardless of their location, income level, or business size. These solutions facilitate access to financial products and services, including for people in rural areas or with limited accessibility.

For the retail segment, the Group develops products and services tailored to different customer categories, considering the specific needs of working adults, young people, students, children, and retirees. The offer includes checking accounts, cards, savings and investment products, consumer and mortgage loans, as well as digital solutions that facilitate personal finance management.

Banca Transilvania supports consumers and end-users through a diverse range of lending services, designed to responsibly meet the financial needs of the population and facilitate equitable access to financing. The retail loan portfolio includes consumer loans, such as the Personal Loan, which offers flexibility in covering current needs, as well as mortgage loans: Home Loan, Mortgage Loans, Fixed-Rate Mortgage Loans, Variable-Rate Mortgage Loans, Green Mortgage Loans, and the Prima Casă/Noua Casă program, which supports access to housing, including through solutions with a low environmental impact.

The bank also offers consumers auto/vehicle loans, including loans for new and used cars, as well as revolving credit products such as Star Card, BT Flying Blue – credit card, Visa Gold credit card, Visa Platinum credit card, and Mastercard Forte credit card. Access to financing is complemented by digital solutions offered through the BT Direct online loan, contributing to an accessible, transparent banking experience tailored to different categories of end users.

The bank also offers products tailored to the needs of young people, such as the BT Omnipass card, which includes benefits such as free account opening and card issuance,

travel insurance abroad at no additional cost, and discounts available through the Omnipass program. To benefit from these advantages, customers must be aged between 14 and 30 years old.

Financial solutions for children include the Kiddo debit card and the BT Pay Kiddo app, which help foster healthy financial habits from an early age, under parental guidance. In this way, we build a solid foundation for financial education and independence, providing young people and children with the tools needed to manage their financial resources responsibly.

For non-retail customers, Banca Transilvania supports responsible economic development and business continuity through a structured range of loans. This includes working capital products, such as the quick loan or the quick credit line. For the acquisition or development of real estate assets, the following products are available: the Corporate Real Estate Loan, the Mortgage Loan for Legal Entities, and the Real Estate-Secured Loan; and entrepreneurial initiatives in the agricultural sector are supported through a dedicated product - the Agricultural Loan. The sustainability dimension is also reflected in green loans, intended for sustainable agriculture, water and waste management, green energy, and energy efficiency. Operational financing needs are complemented by instruments such as discounting and factoring.

The corporate client category is also defined in the Bank's [Sustainable Finance Framework](#).

- a) Financing and/or refinancing of SMEs, aimed at creating jobs and programs designed to prevent and/or mitigate unemployment, as well as climate transition projects. SMEs targeted categories are:
 - those located in socio-economically disadvantaged areas* (nationwide),
 - those owned by women,
 - those owned by young people,
 - start-ups (newly established, no older than three years),
 - owned by farmers engaged in self-employment in socio-economically disadvantaged areas.
- b) For access to healthcare, financing and/or refinancing the construction and/or operation of medical care, primary palliative care, and/or dialysis and/or oncology facilities:
 - healthcare facilities: private hospitals affiliated with the national health system
 - primary care facilities: free primary healthcare facilities affiliated with the national health system,
 - palliative care centers: private palliative care facilities (hospices) affiliated with the national health system,
 - dialysis and oncology facilities: private dialysis and oncology centers affiliated with the national health system.

- c) Financing and/or refinancing the construction and/or operation of educational facilities and/or student housing:
 - o Educational facilities: public educational institutions, such as schools, universities, student housing, and Level 3 housing, as well as vocational training centers.

*Socio-economically disadvantaged areas = areas that meet the following criteria: (i) GDP per capita is lower than the national average; (ii) GDP per capita in purchasing power standard (PPS) is less than 75% of the EU-27 average.

Solutions tailored for micro-enterprises are offered through BT Mic and include the Loan for Small Businesses, the Loan for Small Businesses in Agriculture, the Loan for Small Businesses in Education, and loans backed by European Guarantees.

Victoriabank offers consumer loans and flexible financing solutions, such as the Consumer Loan, Secured Loan, Express Online Loan, and Overdraft, as well as credit card products, including the STAR Card and STAR Card Platinum. The portfolio is complemented by real estate loans: the Real Estate Loan, the Real Estate Refinancing Loan, and the Prima Casă Plus program loan, which supports access to housing and the responsible management of personal finances. For legal entities, Victoriabank offers financing solutions to support current operations and further development of corporates, including working capital loans, credit lines, overdrafts, loans for agricultural investments, as well as factoring and financing through special programs that may include guarantees, interest subsidies, or other incentives. This offering reflects the bank's commitment to supporting end-users and the business community through accessible, diversified lending instruments tailored to the current economic context.

The development and provision of inclusive products and services represent one of the ways in which the Group addresses the impacts, risks, and opportunities identified in its relationship with customers. This initiative is implemented across the Bank's entire network, with products available through both physical branches and digital channels.

The actions through which the Bank manages the impacts, risks, and opportunities in its relationship with customers are integrated into the process of developing and updating products and services. Their launch and adaptation represent a continuous process, carried out based on an internal schedule that establishes clear stages of analysis, approval, implementation, and monitoring. Products are reviewed periodically, including from the perspective of the clarity of contractual terms and the accessibility of information, and adjustments are made based on market developments and customer feedback.

To mitigate potential negative impacts on consumers, protective mechanisms and relevant institutional partnerships for handling complaints are maintained. The effectiveness of these measures is monitored using performance indicators such as the Net Promoter Score, Customer Effort Score, and Human Interaction Score, as well as by tracking complaint resolution times. The necessary resources are allocated in accordance with the annual

budget, including for the continuous development and optimization of digital products and channels.

Servicii financiare pentru toți

The Group continued to strengthen access to financial products and services for underserved and rural communities by expanding access points and digital channels.

At Banca Transilvania, data from the past three years reflect both the increasing level of digitalization in rural areas and the diversification of financial infrastructure.

Banca Transilvania: Access points in economically underdeveloped or less populated areas	2025	2024
% of digital customers among BT's rural customers	76.00%	69.00%
% of rural customers among digitized customers	17.00%	15.40%
ATMs in rural areas	9.00%	6.80%
POS terminals in rural areas	12.00%	11.20%
Cardholders in rural areas	18.00%	16.50%

Victoriabank contributes to expanding financial access in the Republic of Moldova, including in sparsely populated areas or those with limited economic development. The evolution of its infrastructure over the past two years demonstrates a steady increase in access points and the use of modern financial services.

Victoriabank: Access points in economically underdeveloped or less populated areas	2025	2024
Nr. of branches	32	30
Nr. of ATMs	132	122
Nr. of Pos terminals	4,114	3,302
Cards	316,912	260,686

BT Direct

In 2025, 51.16% of BT Direct cardholders were from rural areas, up from 50.18% in 2024. This progress reflects the expansion of financial services accessibility for underserved segments of the population. At the same time, customers who receive a BT Direct card are enrolled in a financial education program within one month of issuance: they are contacted by phone and receive information about the card's features and responsible use, based on an educational script.

BT Mic

BT Mic offers lending solutions for early-stage entrepreneurs and businesses with annual revenue of up to RON 1 million, regardless of their legal status: authorized sole proprietors, sole proprietorships, freelancers, agricultural producers, or NGOs. Most of BT Mic's clients are family businesses, deeply rooted in the communities where they operate, thereby contributing to local economic development and increasing the resilience of rural areas.

BT Mic	2025	2024
Growth in loan balances compared to the previous period	31.23%	31.02%
Increase in the number of financed customers compared to the previous period	22.73%	24.97%
Number of clients financed since launch	43,409	35,369
No. of loans granted since launch	61,223	49,004
Total amount granted since launch	3,921,460,839	2,988,145,032
Loans granted during the year	12,219	10,167
Outstanding loans granted to customers with female shareholders	13,170	10,905
Loans granted during the year to customers with female shareholders	5,005	4,322
Outstanding loans granted to customers with shareholders under 30 years of age	4,646	3,876
Loans granted to customers with less than 30 years of ownership	1,811	1,484
BT Mic First lender (among new customers financed)	69.4%	73.50%
Loans granted to startups within the year (<=18 months)	23.4%	23.70%

BT Mic Success Stories

MAVTEAM SERV – Celebrate Space

In 2025, MAVTEAM SERV, a startup with an all-female entrepreneurial team, secured financing through BT Mic to develop a space dedicated to hosting events for children and adults, under the Celebrate Space concept.

The investment focused on setting up and equipping a multifunctional space in Bucharest, which includes a modern indoor area, a fully equipped kitchen, a relaxation area, and an outdoor courtyard. The business model is geared toward organizing private events, such as birthdays and themed parties for children, as well as meetings or training sessions for adults.

Through this funding, the company has strengthened its operational capacity and created a suitable framework for developing an integrated event planning service, while also contributing to the support of women's entrepreneurial initiatives in urban areas.

SUIIT

SUIIT is a startup in the artisanal dessert production sector, with less than 18 months of operational activity at the time the loan was granted. In 2025, the company received a financing from BT Mic for the purchase of equipment, the renovation of the production space, and working capital support.

The business model focuses on the production of premium desserts, made in-house, with an emphasis on quality, consistent standards, and operational efficiency. In addition to direct sales, the company also offers manufacturing services for partners in the HoReCa sector, helping to optimize costs and ensure constant control over food quality and safety.

The funding supported the consolidation of the production infrastructure and the development of the company's capacity to meet the growing demand present in the artisanal desserts segment.

Digitalization for Accessibility

Digitalization continues to be a strategic pillar in expanding access to financial products and services, helping to reduce traditional barriers, whether geographic, economic, or related to knowledge levels. Through simple, efficient, and scalable technological solutions, the Group facilitates customer access to relevant services at any time and from any location.

Customers are showing increasing interest in modern solutions that streamline the management of financial services. Among the frequently used digital tools are virtual cards,

credit products, savings, investments, insurance, and private pensions, all integrated into a unified digital ecosystem.

Digitalization plays a fundamental role in transforming the banking sector and directly contributes to sustainable development goals. It promotes financial inclusion, reduces the carbon footprint, and supports the transition to a sustainable, low-emission economy. By 2025, the Bank facilitated access to financial services for segments of the population that previously lacked consistent interaction with the traditional banking system, by expanding access to mobile and online services. As a result, banking products and services have become more accessible to people in remote or underserved areas, helping to reduce economic and social disparities.

At the same time, the transition to digital processes has generated significant benefits in reducing the environmental impact. The migration of operations from the physical to the digital environment limits the consumption of paper and resources, and remote access to banking services reduces the need for travel, thereby lowering the carbon emissions associated with traditional operations.

The digitization process continued in Banca Transilvania during 2025, contributing significantly to expanding access to financial services and improving the customers' experience. These developments reflect a consistent growth compared to 2024, both in terms of the number of digital users and the volume of transactions processed through digital channels.

The number of digital customers reached 4.9 million in 2025 (4.4 million in 2024), reinforcing the shift toward digital solutions and confirming their preference for fast, secure, and accessible interactions. The number of active cards grew from 7 million in 2024 to 8.1 million in 2025, with Banca Transilvania maintaining its leading position in the card market.

At the same time, transactions made with BT cards recorded an annual growth of 19%, continuing the positive trend observed during the last years. Credit cards exceeded 769,000 units in 2025, thus contributing to the diversification of the portfolio of digitally used products.

Mobile payments increased by 29% in 2025 compared to 2024, and the number of unique cards enrolled in BT Pay, Apple Pay, Google Pay, Fitbit Pay, and Garmin Pay reached 5.7 million in 2025 from 4.5 million in 2024, confirming the accelerated adoption of digital wallets.

Money transfers initiated via the BT Pay app increased by 70% in 2025 compared to 2024, while the volume of non-card digital transactions grew by 24% compared to 2024, reflecting the gradual shift from traditional operations to integrated digital solutions.

Thanks to the continuous expansion of its digital and physical infrastructure, by the end of 2025 BT had a network of: 2,031 ATMs (compared to a smaller network in 2024), including 696 multifunctional ATMs and 577 BT Express terminals used for non-cash transactions,

over 178,000 installed POS terminals and 40,000 STAR partner locations with partnerships covering over 8,000 e-commerce merchants, an increase from the previous year.

BT Chat continued to be a relevant digital support tool, exceeding 1.5 million interactions in 2025. The new technological optimizations resulted in over 80% of requests being resolved automatically, while only 20% of the conversations required human intervention by consultants.

In addition, the launch of the feature to enroll in a voluntary pension fund (Pillar III) directly through BT Pay, in August 2025, generated over 8,600 new enrollments, thus consolidating the list of long-term savings products integrated into the bank's digital ecosystem.

Digital Accessibility

Digital accessibility is a strategic priority for Banca Transilvania, in line with the bank's commitment to providing inclusive financial services that comply with Law No. 232/2022 and the international WCAG (Web Content Accessibility Guidelines) standards.

These are a set of international standards that establish how digital websites and applications should be designed and developed so that they are accessible to all users, including people with disabilities.

The Bank aims to ensure equitable access to its digital platforms for all users, including people with disabilities, as the full requirements take effect on June 28, 2025.

In 2025, BT continued its website accessibility program, based on the external audit conducted for the desktop and mobile versions of the apps. Given the complexity and volume of content, accessibility remains a gradual process, with WCAG-compliant versions being released successively. A significant step forward is the implementation of the accessibility widget, which allows users to customize the interface by adjusting contrast, enlarging text, enabling dyslexia-friendly mode, disabling animated elements, and simplifying navigation for users with visual or cognitive impairments.

In parallel, the Bank has initiated the process of adapting the BT Pay app, based on a partial audit conducted for screens critical from the users' perspective. The implementation of the recommendations is managed internally and aims to optimize visual elements, increase contrast and readability, adapt interactive areas for users with motor impairments, improve the logical structure, and ensure full compatibility with screen readers.

At the same time, BT has published [its Accessibility Statement](#), available on the website under the "Diversity & Inclusion" section.

The document outlines the institution's commitment to accessibility, the results of the June 2025 audit indicating partial compliance with the in-place requirements, as well as the main barriers identified (lack of text alternatives, inaccessible semantic structure, insufficient contrast, and difficulties navigating exclusively with the keyboard). The statement also

includes a remedy plan, which provides for the gradual implementation of compliant versions and periodic updates based on progress made.

In addition, the bank has established a feedback mechanism for reporting accessibility issues, with users able to use the dedicated section on the website and the email address accesibilitate@btrl.ro , with a response time of up to 30 days.

Through these measures, Banca Transilvania is strengthening its commitment to digital inclusion, equal access, and progressive compliance with European and national accessibility legislation.

BT Go

Continuing its efforts to support the SME sector, BT has dedicated time and resources to effectively improving the all-in-one banking platform for entrepreneurs, BT Go, which has become an adaptable business ecosystem. By the end of 2025, the adoption and usage of the service had grown significantly, with the number of users reaching 330,767 and the volume of transactions reaching 29 million, with an impressive cumulative value of RON 329 billion.

The platform offers a useful set of features:

- Fast payments and transfers
- Standard and negotiated exchange rates
- Opening and closing of standard and negotiated deposits
- Viewing/managing limits and blocking/unblocking cards
- Statement download FGO and RO e-Invoice integration

Digitization at BT Mic

In the area of digitalization and financial inclusion, BT Mic significantly simplified the loan application process by introducing Raul chatbot, a user-friendly digital channel that generated 23.3% of all financing requests in 2025.

Through the Stup platform, BT Group continued in 2025 to support the professionalization of Romanian entrepreneurs, contributing to increased operational efficiency and facilitating access to digital tools essential for sustainable business development.

Throughout 2025, over 1,900 unique companies accessed the digital solutions available on Stup, purchasing more than 3,100 digital products dedicated to online commerce and the digitization of business processes, such as electronic signatures, invoicing solutions, digital cash flow, and courier services. These solutions have supported tax compliance, transparency, and good governance in the operations of small and medium-sized enterprises. By the end of 2025, the Stup community had cumulatively reached over 20,000 products accessed.

Through these initiatives, Stup actively contributes to the digital inclusion of the entrepreneurial environment, the improvement of governance practices, and the development of a more resilient and sustainable economic ecosystem in Romania.

In 2025, “Raul de la BT” chatbot, dedicated to entrepreneurs at BT Mic, has become an important tool for digital inclusion, facilitating rapid access to financial information and essential services for over 51,853 unique users, including 44,699 authenticated customers who interacted with it on a recurring basis. In total, over 1 million messages were exchanged, with the chatbot receiving 528,278 and sending 1,022,139, thus demonstrating a high level of usage and operational reliance for entrepreneurs. The most accessed flows were Account Balance (59.32%), CE/BO Request (21.74%), and Garnishment Info (7.68%), reflecting the real needs of small and medium-sized businesses for rapid and autonomous management of financial information. Additionally, 13,257 customers provided feedback on various workflows, mostly on CE/BO Request (83.59%), and the overall experience with the chatbot was rated as “very good” by 75.95% of the users and “good” by another 12.79%, thus confirming its role in reducing digital barriers and increasing easy access to banking services for entrepreneurs in the BT ecosystem

Victoriabank

In 2025, the VB24 app maintains its role as an essential digital channel for interacting with individual customers, ensuring permanent access to banking services. Available both as a mobile app via Google Play and the App Store and as a web version, the app allows users to open accounts and cards, make payments, and easily manage their banking relationship at any time. The MIA Instant Payments service remains integrated into the bank’s digital ecosystem, offering the ability to send and receive transfers in seconds - based on a phone number, without entering card details. Transfers are made in MDL between domestic bank accounts, quickly and securely.

Available features include P2P transfers based on aliases, R2P payment requests, QR code payments, and Me2Me transfers between personal accounts held at participating financial institutions. The app also allows for the direct payment of government securities purchased through the evms.md platform, expanding users’ access to investment services via the digital channel.

BT Direct

In 2025, digital accessibility for BT Direct customers continued to advance, with a significant increase in the use of the BT Pay app. The number of BT Direct cards enrolled in the app reached 58,487, surpassing the 2024 level of 54,357, representing an increase of 4,130 cards (+7.6%) and indicating an increasingly solid adoption of digital channels. Although the online portal was accessed by 6,884 customers in 2025, a decrease from the previous year, the available features (i.e. mobile payments, viewing card details, confirming

online payments, checking balances, and reviewing recent transactions) helped facilitate digital interaction and modernize the BT Direct customer experience.

BT Capital Partners

The BT Trade (EVO) desktop trading platform and the BT Trade apps for iOS and Android allow clients to place, modify, and cancel trading orders online. Additionally, the BT Trade (EVO) platform and the BT Trade mobile app allow for the opening of trading accounts exclusively online; the documents required for account opening are accepted directly within the platform, eliminating the need to print or sign physical documents. To minimize paper usage, orders from clients assisted by a broker are primarily taken over the phone or via email; paper orders are permitted only in exceptional circumstances.

New contract	2025	2024
On-line	84%	81%
Paper	16%	19%
Total	100%	100%

Orders	2025	2024
On-line	99%	99%
Paper	<1%	1%
Total	100%	100%

Total number of customers	2025	2024
Online	71%	65%
Assisted	29%	35%
Total	100%	100%

The BT Visual Help System

BT Visual Help is Banca Transilvania's digital self-service platform, designed to help customers quickly access information about their bank accounts and products directly from their phone, without waiting on hold or interacting with an agent.

BT Visual Help plays a new role in the support ecosystem: educating customers on BT Pay features. BTVH is connected to BT Pay for common requests and for support provided via ChatBT. Thus, in 2025, 4.9 million visual sessions were initiated, thanks to the numerous new features in BT Pay and the migration of customers to the native app.

The CSAT score, which reflects customer satisfaction measured at the end of a visual session by completing the feedback form, was 93% in 2025.

Ask BT

Ask BT is an online platform, designed as a search engine, with over 2,000 questions and answers about banking, as well as about the products and services of Banca Transilvania Group companies. Thanks to the integration of artificial intelligence, people searching for information using AI Search receive a comprehensive answer to their online questions, based on all the details available on Ask BT regarding that topic

- Over 3.5 million people visited the site in 2025, and nearly half a million did so to chat with AI Search
- On average, visitors ask 3 questions via AI Search and stay in the conversation for about 3 minutes
- Visitors' interest has shifted from year to year, so the most searched-for information is about the BT Pay and BT Go apps and about BT products and services
- Nearly 80% visit the site from a mobile phone, and 55% landed on the website via direct access.
- From abroad, the site is visited mainly from Germany, the UK, Italy, Spain, and France. The number of visits from the Republic of Moldova has increased year over year.

Banca Transilvania integrates artificial intelligence into its online communication, services, and processes, using both Robotic Process Automation (RPA) and Large Language Models (LLM).

BT Dialog Branches

BT Dialog branches offer free, personalized financial advice, ranging from loans and related products to insurance and digital solutions, making them the perfect place for the Bank to engage in an open dialogue and find personalized solutions for each client.



There is currently a network of 42 Dialog branches, and customers can find their locations directly on the BT website, in the branch network section.

Measures implemented to address or mitigate a real material impact

To address the actual impact on consumers and end-users, the Bank has implemented concrete measures designed to ensure easy access to relevant information about the products and services offered. Thus, consumers have access to up-to-date details via the dedicated micro websites of each entity of the Group, but also in the BT branches and units, where essential information, such as the list of fees and charges, is available in the customers' information booklet.

Regarding consumer safety, Banca Transilvania pays special attention to informing and protecting its consumers in the digital environment. A dedicated blog-style page, [BT Online Security](#), has been launched, where essential topics such as fraud, cyberattacks, online shopping security, the proper use of ATMs, and the protection of entrepreneurs against digital risks are addressed. The page also includes a special section for news, providing constant updates on the types of fraud and practical methods users can use to protect their data and bank accounts. Details on the measures and actions implemented by the Group during the reporting period can be found in section 3.6, Cybersecurity and Personal Data Protection.

Additional initiatives or processes primarily aimed at generating positive outcomes for consumers and end users

Since its launch, Banca Transilvania has been actively involved in supporting entrepreneurs by providing accessible financial products and services, financial education, and personalized advice. Through these initiatives, BT has facilitated the development of small businesses and startups, ensuring they receive clear, transparent, and easy-to-understand information to make responsible financial decisions.

To support entrepreneurs even more effectively, BT has created dedicated business lines, contributing to the building of a robust and sustainable entrepreneurial ecosystem. In this way, the Bank maintains its commitment to adding value to the communities in which it operates, offering financial solutions tailored to the specific needs of early-stage businesses.

A key pillar of BT's strategy is the continuation of partnerships with international financial institutions (IFIs), such as the European Investment Fund (EIF), the International Finance Corporation (IFC), and the European Bank for Reconstruction and Development (EBRD). These collaborations enable the implementation of financing programs with a social and environmental component, designed to support education, women's entrepreneurship, financial inclusion, and the reduction of negative environmental impacts.

In addition, BT includes in its social financing framework client groups that need access to essential services (in line with SDG 11 – Sustainable Cities and Communities) and supports job creation (in line with SDG 8 – Decent Work and Economic Growth). A major objective of the Bank is to facilitate access to financing for those categories that are not normally

supported by state aid, thereby offering broader opportunities for economic growth and sustainable development.

Details about the sustainable financing products developed by the Group's entities can be found in subsection 3.3 Sustainable Financing.

Monitoring and assessing the effectiveness of actions or initiatives implemented for customers

Tools such as NPS (Net Promoter Score) an indicator that measures customers' willingness to recommend the bank) and HI (Human Interaction) an indicator that assesses the quality of customer–colleague interaction, specifically friendliness, clarity of answers, and the ability to meet the customer's needs) are used to track and evaluate the effectiveness of the actions and initiatives implemented for customers, providing a clear picture of the level of satisfaction, loyalty, and on the quality of interactions.

In 2025, the NPS for customers who performed transactions in the branches/units of BT was 86.25, and the HI recorded a score of 98.65, remaining at a very high level and posting an increase compared to the previous year. The results are based on nearly 80,000 feedback responses, of which approximately 75,000 came from retail customers and 5,000 from corporates.

Internally, customer satisfaction is monitored at multiple touchpoints: when opening an account, both in-branch and via digital applications; after completing a transaction in-branch; at the product level, in the context of launching new digital features; and in the evaluation of the overall relationship with the bank, including during the termination of the contractual relationship. This research provides relevant insights for the continuous improvement of the customers' experience.

The “reception concept” implemented across the BT network significantly contributes to an increased level of satisfaction. In situations where customers receive a dedicated “welcome” from a colleague who provides quick guidance and predictability, the NPS increases by over 25 points. A similar effect is observed when alternatives are offered for performing transactions through digital channels or self-service machines.

Implementing the closed-loop feedback process by analyzing and resolving every actionable element received through feedback, led to 85% of the passive customers becoming promoters and 50% of detractors becoming promoters. In 2025, issues reported by over 1,800 customers were addressed, 88% of which were resolved. Additionally, nearly 2,500 messages of appreciation regarding the interactions at branches were recorded.

Resources Allocated for Managing Material Impacts

To ensure equitable access to quality information, relevant financial products and services, as well as to guarantee the confidentiality of customer data, the Group allocates significant

resources to the development and implementation of the actions described above. These resources come from both internal sources and funding raised through bond issuances or participation in financing programs developed in partnership with international and supranational organizations. This blended approach ensures the sustainability of the investments needed to effectively manage material impacts and fulfill the commitments made to the Group's customers.

3.3 Sustainable Financing

The Role of Sustainable Finance in the BT Group's Strategy

Sustainable financing is one of the strategic directions through which the BT Group contributes to the transition to a low-carbon economy and to supporting sustainable economic development in Romania. As the main financier of the local economy, the bank plays a key role in directing capital flows toward economic activities that reduce environmental impact, promote the efficient use of resources, and support inclusive economic growth and long-term resilience.

The BT Group's approach begins with a structured analysis of the financing portfolio and the interaction between lending activities and the real economy. In this context, sustainability criteria are progressively integrated into lending and risk management processes, as well as into dialogue with clients, with the aim of supporting their adaptation to an economic environment characterized by increasing pressures related to the climate transition, resource efficiency, and long-term competitiveness requirements.

The relevance of sustainable financing is underscored by Romania's macroeconomic and social context, marked by the need to accelerate investments in energy efficiency, renewable energy, modern infrastructure, and technology. Although Romania's economy has continued to show positive momentum in recent years, the process of convergence toward the European Union average remains incomplete, and the benefits of economic growth are not evenly distributed across regions and segments of the population.

According to preliminary Eurostat data for 2024, Romania stands at approximately 78% of the EU average in terms of GDP per capita expressed in purchasing power parity. On the social front, significant disparities in income distribution persist, particularly between urban and rural areas, as well as across regions. Although the Gini index improved in 2024, income inequality remains a structural challenge. At the same time, World Bank data indicate that, between 2018 and 2023, the growth in real incomes of the most vulnerable segments of the population lagged behind the growth rate of the total population, highlighting the persistence of vulnerabilities in the labor market.

In this context, small and medium-sized enterprises continue to play a central role in Romania's economy, accounting for nearly all companies in the non-financial sector and employing a significant share of the workforce. This segment's ability to invest in modernization, energy efficiency, new technologies, and digitalization is essential for sustaining economic growth and accelerating the transition to a more sustainable development model.

To support this structural transformation, the European investment and financing framework places a strong emphasis on mobilizing investments through dedicated instruments, such as the National Recovery and Resilience Plan and the Structural and Cohesion Funds for the 2021–2027 period. These mechanisms create significant financing

opportunities for green and digital transition projects, with a direct impact on the competitiveness and resilience of SMEs.

However, capitalizing on these opportunities depends directly on companies' access to bank financing, which is necessary both for co-financing projects and for covering the capital needs associated with their implementation. Given the high cost of borrowing and collateral requirements, access to financing remains a structural constraint for many companies, reinforcing the role of financial institutions in facilitating the absorption of European funds and supporting investments with long-term impact.

In this macroeconomic context, sustainable financing is emerging as a key mechanism for directing capital toward investments that address both environmental and social challenges, but especially long-term economic growth objectives. Through its lending activities, the BT Group contributes to supporting these investments by facilitating access to capital for various segments of the economy and supporting processes of adaptation to climate change, modernization, and sustainable development.

Specifically, the role of sustainable finance in the BT Group's strategy is reflected in:

- supporting economic development and access to financing, particularly through financing micro, small, and medium-sized enterprises;
- supporting the transition to a low-carbon economy by financing energy efficiency, renewable energy, sustainable infrastructure, and innovative technology projects;
- channeling capital toward economic activities with a positive impact on the environment and society by integrating ESG criteria into lending processes and using internationally recognized frameworks and methodologies to identify and classify sustainable financing.

At the same time, the structure of the loan portfolio reflects how the BT Group's financing activities interact with the key sustainability themes identified in the Group-wide double materiality analysis. The distribution of exposures by economic sector allows for an assessment of the relevance of different business areas in terms of their impact on the environment and society, as well as the risks and opportunities associated with the transition to a more sustainable economy.

The table below presents the structure of Banca Transilvania's and BT Group's loan portfolio, broken down by economic sector, highlighting the distribution of exposures as of 2025.

Loan portfolio by economic sector (NACE Rev.2.1)	%2025 BT	%2024 BT	%2025 GFBT	%2024 GFBT
A. Agriculture, forestry and fishing	4.45%	4.87%	5.01%	5.63%
B. Mining and quarrying	0.24%	0.10%	0.25%	0.15%
C. Manufacturing	6.41%	6.74%	6.85%	7.18%
D. Electricity, gas, steam and air conditioning supply	2.69%	2.17%	2.62%	2.12%
E. Water supply; sewerage, waste management and remediation activities	0.36%	0.31%	0.42%	0.40%
F. Construction	2.84%	3.08%	3.64%	3.87%
G. Wholesale and retail trade	8.32%	9.54%	10.02%	10.86%
H. Transportation and storage	3.12%	3.16%	4.19%	4.18%
I. Accommodation and food service activities	1.61%	1.38%	1.88%	1.68%
J. Publishing, broadcasting, and content production and distribution activities	0.06%	0.06%	0.10%	0.09%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	1.06%	0.63%	1.29%	0.76%
L. Financial and insurance activities	7.95%	8.27%	1.11%	1.32%
M. Real estate activities	5.35%	3.77%	5.16%	4.67%
N. Professional, scientific and technical activities	0.82%	0.87%	1.29%	1.38%
O. Administrative and support service activities	0.79%	0.73%	1.22%	1.04%
P. Public administration and defence; compulsory social security	10.77%	11.75%	10.06%	10.05%
Q. Education	0.09%	0.08%	0.17%	0.15%
R. Human health and social work activities	2.08%	2.42%	2.22%	2.27%
S. Arts, sports and recreation	0.20%	0.63%	0.32%	0.63%
T. Other service activities	0.41%	0.42%	0.82%	0.64%
U. Activities of households as employers and undifferentiated goods - and service-producing activities of households for own use	0.00%	0.00%	0.00%	0.00%
V. Activities of extraterritorial organisations and bodies	0.00%	0.00%	0.00%	0.00%
INDIVIDUALS	40.38%	39.05%	41.37%	40.93%
Total	100%	100%	100%	100%

To ensure the comparability of the data presented, the distribution of the loan portfolio for 2024 has been transposed into the NACE Rev. 2.1 classification structure applicable as of January 1, 2025. This adjustment reflects solely an update to the sectoral classification and does not imply any changes to the exposure values.

Policies and Frameworks for Sustainable Financing

To operate this strategic role and direct capital flows toward economic activities with a positive impact on the environment and society, the BT Group utilizes a set of internal policies, assessment methodologies, and frameworks dedicated to sustainable finance used in capital markets. These tools enable the channeling of capital toward sustainable economic activities, as well as the classification and monitoring of sustainable financing provided to clients.

In practice, the BT Group's approach is based on two complementary mechanisms:

- internal policies and methodologies applied in day-to-day lending activities, through which sustainable financing provided to clients is identified, assessed, and classified;
- the BT Group's Sustainable Financing Framework, used for issuing green, social, or sustainable financial instruments and for allocating the funds raised to eligible loan portfolios.

Sustainable Lending Policy in Day-to-Day Lending Activities

At the operational level, the European Programs and Green Loans Department is the specialized unit within the bank responsible for coordinating and consolidating sustainable financing activities. The department plays a central role in developing and implementing sustainable financing products across the bank's business lines, helping to identify sectors, industries, and clients with the potential for positive impact, as well as relevant financing programs and opportunities. At the same time, it ensures the definition of structures, workflows, and rules applicable to sustainable lending, the transfer of know-how to the regional network and business lines, as well as the incorporation of European, national, or international partner requirements into the internal lending framework.

The department's activities are governed by the Internal Instruction on Sustainable Financing, a document that establishes the criteria for identifying, classifying, and monitoring financing with a positive impact on the environment or society. The Instruction defines the methodology used by the bank to identify and label sustainable loans in the lending portfolio and describes the main categories of eligible financing.

Categories of financing with a positive impact on the environment

Under the internal methodology, financing with a positive impact on the environment is structured into eight main categories, each of which is aligned with the United Nations Sustainable Development Goals.

Renewable Energy (RE)

Financing in this category targets investments in infrastructure or equipment that enables the production or use of energy from renewable sources, such as solar, wind, hydro, geothermal, biomass, or biogas.

Eligible projects include the construction or installation of renewable energy production capacity, as well as the manufacture or supply of equipment intended exclusively for the generation or use of energy from renewable sources. In certain situations, funding may target projects implemented by companies that use the energy produced primarily for their own consumption, as prosumers.

These investments directly contribute to achieving SDG 7- Affordable and Clean Energy.

Energy Efficiency (EE)

Funding for energy efficiency targets investments made by companies to reduce energy consumption through equipment modernization, optimization of industrial processes, or the implementation of more energy-efficient technologies.

Eligible projects include the purchase or modernization of production equipment and energy systems or the implementation of energy-efficient technologies. Eligibility is determined based on minimum criteria regarding the reduction of energy consumption or greenhouse gas emissions.

This funding contributes to SDG 9 – Industry, Innovation, and Infrastructure.

Sustainable Transport (T)

Funding for sustainable transport includes investments in electric or plug-in hybrid vehicles, as well as the modernization of transport fleets to improve energy efficiency.

For projects aimed at replacing existing vehicles, the new vehicles must provide a significant improvement in fuel efficiency or use low-emission technologies.

This category contributes to SDG 11 – Sustainable Cities and Communities.

Green Buildings (GB)

Funding for green buildings includes projects for the construction or renovation of buildings that comply with recognized energy performance and sustainability certification standards, such as LEED, BREEAM, EDGE, or DGNB. Buildings that meet nZEB (nearly zero energy buildings) standards are also considered eligible.

These investments contribute to improving the energy performance of the real estate sector and reducing resource consumption, aligning with SDG 11 - Sustainable Cities and Communities.

Water Efficiency (WE)

Funding in this category includes investments aimed at reducing water consumption or optimizing the use of water resources in industrial processes or service infrastructure.

Projects may include the modernization of existing facilities, the implementation of water recycling or reuse systems, the use of alternative water sources, or the installation of advanced wastewater treatment technologies.

These investments contribute to SDG 14 – Life Below Water and SDG 13 – Climate Action.

Climate Change Adaptation (CCA)

This category includes funding for projects that help reduce the vulnerability of economic and social systems to the effects of climate change.

Eligible projects may focus on infrastructure to protect against extreme weather events, climate risk management solutions, or measures to increase the resilience of infrastructure and ecosystems.

This funding contributes to SDG 15 – Life on Land.

Special Environmental Funding (SEF)

The special environmental funding category includes projects that contribute to climate change mitigation or environmental protection, but for which the impact on emissions reduction cannot be directly quantified.

The most common area falling under this category is the circular economy, through funding for investments that give equipment a second life or facilitate waste recycling: the purchase of equipment for waste collection and recycling, including waste from agricultural activities, as well as for the recovery and reuse of certain waste components. Examples of eligible projects include funding for companies developing technologies for climate-smart agriculture, research and development activities in the field of sustainability, or afforestation and biodiversity protection projects. Equipment such as batteries for energy storage or grid stabilization, as well as systems for collecting information related to reducing the carbon footprint, are also eligible.

This funding contributes to SDG 12- Responsible Consumption and Production.

Blue Financing

Blue financing targets projects that contribute to the protection and sustainable management of aquatic ecosystems and water resources.

This category includes investments in water supply and treatment infrastructure, technologies to reduce marine pollution, projects in the sustainable fisheries sector, or initiatives to reduce plastic waste in aquatic ecosystems.

These investments contribute to SDG 6- Clean Water and Sanitation and SDG 14- Life Below Water.

Identification and classification of financing with a positive environmental impact

To identify and classify financing with a positive environmental impact, the bank uses internationally recognized tools and methodologies, including:

- CAFE (Climate Assessment for Financial Institutions), an application developed by the International Finance Corporation (IFC) to assess the climate eligibility of projects;
- Green Gateway, used in financing programs implemented in partnership with international financial institutions, such as the European Investment Fund (EIF) or the European Investment Bank (EIB).

These tools enable the validation of project eligibility and the classification of financing based on the type of impact generated.

The labeling of financing with a positive environmental impact, in accordance with internal methodology, is carried out within the bank's internal systems, and the validation of project classification is performed by specialists within the departments involved in the lending process and monitored periodically at the central level.

The internal instruction also includes references to the European Union Taxonomy, used as a classification system for sustainable economic activities at the European level. Although a full assessment of alignment with the Taxonomy requires a detailed analysis of the technical screening criteria and the "Do No Significant Harm" principle, the information collected during the lending process helps improve the bank's ability to monitor its sustainable financing portfolio and meet various reporting requirements.

BT Group's Sustainable Finance Framework

To complement its operational lending policies, the Banca Transilvania Group developed the Sustainable Finance Framework in 2023, which is used to structure and issue sustainable financial instruments, to allocate raised funds to eligible loan portfolios, and to determine the impact of such financing on the environment, the economy, and society.

Based on this framework, Banca Transilvania and its subsidiaries can issue a wide range of sustainable financial instruments, including:

- green financing instruments;
- social finance instruments;
- sustainable financing instruments.

The framework is aligned with the main international standards used in capital markets for sustainable financing, including:

- Green Bond Principles (ICMA)
- Social Bond Principles (ICMA)
- Sustainability Bond Guidelines
- Green Loan Principles (LMA)
- Social Loan Principles (LMA)

In accordance with these standards, the framework is structured around four fundamental components:

1. Use of Proceeds – defining categories of eligible projects;
2. Project evaluation and selection process – establishing criteria and responsibilities for including projects in the eligible portfolio;
3. Management of Raised Funds – monitoring the allocation of raised funds to the eligible loan portfolio and managing, where applicable, unallocated funds;
4. Reporting – periodic publication of information regarding the allocation of funds and the impact of financed projects.

Funds raised through sustainable financing instruments are used to finance or refinance a portfolio of eligible loans. To avoid double-counting of impact, the portfolio excludes financing that has already been supported by similar financing provided by international financial institutions.

To ensure transparency toward investors and other stakeholders, the BT Group periodically publishes documents regarding the implementation of the framework, including:

- The BT Group's Sustainable Finance Framework,
- Second Party Opinion issued by an independent agency (Sustainalytics),
- Allocation and Impact Report,
- MSME Impact Report,
- Limited Assurance Report (ISAE 3000) issued by the independent auditor.

The BT Group's sustainable finance portfolio includes both environmental impact financing and social impact financing.

Categories of Green Financing

The BT Group's Sustainable Finance Framework defines the following categories of green financing, based on the ICMA Green Bond Principles (2022) and the LMA/APLMA/LSTA Green Loan Principles (2023):

Green Buildings

This category covers the financing and/or refinancing of the construction, renovation, and/or refurbishment of new and/or existing buildings that meet clear criteria documented through specific certifications.

Renewable Energy

This category covers the financing and/or refinancing of the construction and/or operation of renewable energy, solar, or wind power facilities.

Clean transportation

This category covers the financing and/or refinancing of the purchase, rental, and/or leasing of zero-emission vehicles and/or rail transport, and/or the construction, modernization, maintenance, and/or operation of infrastructure related to zero-emission vehicles and rail transport.

Sustainable agriculture

This category covers the financing and/or refinancing of organic farming certified in accordance with European Union or national regulations.

Although there may be overlaps between the green categories under the Sustainable Finance Framework for capital market operations and the green categories under the internal methodology, particularly in the areas of green buildings or renewable energy, eligibility criteria are closely monitored and adhered to in order to ensure their fulfillment at each reporting date, within the allocation and impact reports.

Social Impact Financing Categories

The BT Group's Sustainable Finance Framework defines, in addition to green financing categories, social financing categories that support inclusive economic development and improve access to essential services for the population.

These categories are defined in accordance with the ICMA Social Bond Principles (2023) and the LMA/APLAM/LSTA Social Loan Principles (2023) and allow funds raised through social bonds to be used to finance or refinance projects that generate measurable social benefits for specific target groups or communities.

The main types of eligible social financing described in the Sustainable Financing Framework include:

Supporting entrepreneurship and job creation

This category focuses on financing small and medium-sized enterprises, including startups and companies in early stages of development, with the aim of supporting job creation and retention and the development of productive economic activities.

In line with the BT Group's business strategy and market positioning, this category is addressed in a granular manner, through the financing of microenterprises and small and medium-sized enterprises, including companies owned by women or young entrepreneurs, as well as independent farmers. Special attention is given to entities operating in areas with lower levels of economic development, including NUTS 2 regions with per capita GDP below the national average and below 75% of the European Union average.

This category contributes to achieving Sustainable Development Goals 1 – No Poverty, 5 – Gender Equality, 8 – Decent Work and Economic Growth, and 10 – Reduced Inequalities, particularly by supporting productive activities, entrepreneurship, and facilitating access to financial services.

Access to essential services

The framework also includes funding aimed at improving access to essential services for the population, such as health and education infrastructure and services. This funding may target the development or modernization of medical facilities, educational infrastructure, or other services that contribute to improving quality of life and developing human capital.

This category contributes to achieving Sustainable Development Goals 3- Good Health and Well-being, 4- Quality Education, and 10- Reduced Inequalities.

By including these social categories, the Sustainable Financing Framework enables the BT Group to direct capital toward both investments with a positive environmental impact and projects that help reduce inequalities, support entrepreneurship, and improve access to essential services.

The sustainable bonds issued by Banca Transilvania starting in 2023 represent allocations of funds raised both for financing/refinancing projects that meet the criteria in the green categories and for financing/refinancing projects that meet the criteria in the social categories. In this way, a positive impact is ensured on both the environment and the economy and society.

Sustainable products for individuals

In addition to sustainable financing for businesses, the BT Group also offers products for individuals, designed to support the purchase of more energy-efficient homes and the adoption of consumption solutions with a low environmental impact.

A relevant example is green mortgages, designed for the purchase of homes with high energy performance or that meet superior energy efficiency standards. Through these

products, the bank supports customers' access to more energy-efficient homes and contributes to reducing emissions associated with the residential sector.

The bank is also developing dedicated offers and incentives for the purchase of sustainable products and services through commercial partners, thereby encouraging responsible consumption behaviors and increasing the use of technologies with a low environmental impact.

Through these solutions, the BT Group aims to expand public access to financial products that support the transition to a more energy-efficient and sustainable consumption model in the long term.

Integrating ESG criteria and the EU Taxonomy into the lending process

In addition to developing sustainable financing products, the BT Group is progressively integrating sustainability criteria into its lending and risk management processes. This approach reflects the bank's commitment to supporting the transition to a sustainable economy and to appropriately managing risks associated with climate change and other ESG factors.

When analyzing financing provided to corporate clients, the bank considers, where relevant, aspects related to the impact of the financed activities on the environment and society, as well as the potential risks associated with them. The assessment of these elements is part of the broader risk analysis process and contributes to a better understanding of the risk profile of the client and the financed project.

The integration of ESG criteria into the lending process includes, among other things:

- assessing the ESG risks associated with financed projects;
- analyzing the potential impact of financed activities on the environment and natural resources;
- identifying investments that contribute to environmental or social objectives;
- monitoring the loan portfolio from the perspective of exposure to ESG risks.

For financing that can be classified as sustainable financing, the bank uses the internal methodologies described above to assess project eligibility and classify them based on the type and impact of the investment.

At the same time, considering developments in the European regulatory framework on sustainable finance, the BT Group analyzes the extent to which financed activities can be aligned with the criteria established under the European Union Taxonomy. The assessment of alignment with the Taxonomy contributes to increased transparency regarding the impact of the loan portfolio and provides a clearer picture of exposures associated with economic activities that have an environmental impact.

ESG Risk Analysis

The Bank develops and maintains an internal system for classifying environmental (including transition and climate), social, and governance risks, through which each activity, reported at the CAEN code level, is assigned an implicit risk level for each ESG factor. The best available sources, such as specialized studies, publications, official documents, databases, and recommendations from international financial institutions (e.g., EBRD, IFC), are used to determine these implicit risk levels. This system forms the basis for integrating ESG criteria into internal credit and risk management processes.

The portfolio classification and distribution across the seven risk classes for each of the five pillars (physical climate risk, transition risk, environmental risk, social risk, and governance risk) are presented in the tables below.

Calculated climate risk – year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	8%	30%	33%	25%	4%	1%	0%	100%
B. Mining and quarrying	44%	1%	22%	10%	22%	1%	0%	100%
C. Manufacturing	0%	4%	9%	36%	28%	21%	2%	100%
D. Electricity, gas, steam and air conditioning supply	1%	17%	14%	35%	22%	11%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	1%	5%	11%	43%	40%	0%	100%
F. Construction	0%	3%	12%	26%	36%	20%	4%	100%
G. Wholesale and retail trade	0%	1%	5%	23%	42%	23%	6%	100%
H. Transportation and storage	0%	4%	12%	48%	30%	5%	1%	100%
I. Accommodation and food service activities	0%	8%	15%	22%	42%	12%	1%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	1%	25%	31%	23%	21%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	3%	81%	16%	100%
L. Financial and insurance activities	0%	1%	1%	12%	41%	27%	18%	100%
M. Real estate activities	0%	1%	6%	9%	30%	31%	24%	100%
N. Professional, scientific and technical activities	0%	1%	5%	11%	21%	50%	12%	100%
O. Administrative and support service activities	0%	5%	2%	27%	45%	6%	16%	100%
P. Public administration and defence; compulsory social security	0%	0%	0%	45%	15%	10%	30%	100%
Q. Education	0%	14%	26%	24%	22%	13%	1%	100%
R. Human health and social work activities	0%	5%	5%	4%	23%	31%	33%	100%
S. Arts, sports and recreation	0%	0%	1%	11%	36%	34%	18%	100%
Total	1%	6%	10%	23%	27%	27%	7%	100%

Calculated transition risk - year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	0%	1%	13%	79%	7%	0%	100%
B. Mining and quarrying	0%	0%	44%	34%	22%	0%	0%	100%
C. Manufacturing	0%	1%	14%	22%	51%	11%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	4%	7%	36%	53%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	0%	0%	10%	89%	1%	0%	100%
F. Construction	0%	0%	1%	26%	44%	28%	0%	100%
G. Wholesale and retail trade	0%	0%	0%	8%	78%	13%	0%	100%
H. Transportation and storage	0%	0%	1%	64%	22%	13%	0%	100%
I. Accommodation and food service activities	0%	0%	0%	8%	60%	32%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	0%	5%	38%	56%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	82%	18%	0%	100%
L. Financial and insurance activities	0%	0%	0%	1%	19%	80%	0%	100%
M. Real estate activities	0%	0%	0%	7%	19%	73%	0%	100%
N. Professional, scientific and technical activities	0%	0%	1%	5%	32%	57%	6%	100%
O. Administrative and support service activities	0%	0%	0%	43%	40%	17%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	0%	36%	44%	20%	0%	100%
Q. Education	0%	0%	0%	0%	87%	13%	0%	100%
R. Human health and social work activities	0%	0%	0%	5%	25%	69%	1%	100%
S. Arts, sports and recreation	0%	0%	0%	1%	45%	54%	0%	100%
Total	0%	0%	3%	15%	58%	24%	0%	100%

Calculated environmental risk - year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	4%	10%	48%	37%	2%	0%	100%
B. Mining and quarrying	47%	2%	28%	23%	1%	0%	0%	100%
C. Manufacturing	0%	11%	28%	55%	2%	3%	2%	100%
D. Electricity, gas, steam and air conditioning supply	0%	21%	3%	22%	52%	2%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	1%	3%	40%	55%	1%	0%	0%	100%
F. Construction	0%	5%	14%	34%	30%	11%	6%	100%
G. Wholesale and retail trade	0%	2%	8%	32%	18%	40%	0%	100%
H. Transportation and storage	0%	0%	4%	73%	14%	7%	0%	100%
I. Accommodation and food service activities	0%	1%	5%	63%	21%	9%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	3%	16%	22%	27%	31%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	14%	82%	4%	100%

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
L. Financial and insurance activities	0%	0%	0%	15%	24%	19%	42%	100%
M. Real estate activities	0%	1%	6%	15%	3%	16%	59%	100%
N. Professional, scientific and technical activities	0%	0%	2%	13%	32%	34%	19%	100%
O. Administrative and support service activities	0%	0%	0%	66%	13%	21%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	36%	18%	0%	44%	2%	100%
Q. Education	0%	0%	3%	15%	14%	67%	0%	100%
R. Human health and social work activities	0%	0%	1%	11%	7%	67%	14%	100%
S. Arts, sports and recreation	0%	0%	0%	31%	16%	45%	8%	100%
Total	0%	4%	8%	33%	20%	28%	6%	100%

Calculated governance risk – year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	3%	69%	24%	5%	0%	100%
B. Mining and quarrying	0%	3%	4%	81%	12%	0%	0%	100%
C. Manufacturing	0%	5%	19%	40%	27%	8%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	16%	45%	27%	12%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	2%	6%	17%	47%	28%	0%	100%
F. Construction	0%	11%	14%	29%	33%	12%	0%	100%
G. Wholesale and retail trade	0%	3%	4%	35%	49%	9%	0%	100%
H. Transportation and storage	0%	1%	3%	70%	23%	2%	0%	100%
I. Accommodation and food service activities	0%	2%	6%	26%	62%	3%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	4%	11%	48%	37%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	2%	98%	0%	100%
L. Financial and insurance activities	0%	0%	0%	20%	29%	51%	0%	100%
M. Real estate activities	0%	3%	0%	23%	24%	50%	0%	100%
N. Professional, scientific and technical activities	0%	0%	1%	7%	43%	47%	2%	100%
O. Administrative and support service activities	0%	1%	1%	37%	22%	40%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	0%	45%	9%	46%	0%	100%
Q. Education	0%	1%	1%	4%	26%	68%	0%	100%
R. Human health and social work activities	0%	1%	1%	3%	34%	62%	0%	100%
S. Arts, sports and recreation	0%	0%	0%	10%	50%	39%	0%	100%
Total	0%	3%	6%	32%	29%	30%	0%	100%

Calculated social risk – year 2025

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	38%	43%	14%	4%	0%	100%
B. Mining and quarrying	3%	0%	54%	42%	1%	0%	0%	100%
C. Manufacturing	0%	7%	24%	57%	7%	4%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	19%	28%	24%	29%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	1%	5%	18%	68%	7%	1%	0%	100%
F. Construction	0%	10%	19%	32%	9%	27%	3%	100%
G. Wholesale and retail trade	0%	1%	5%	52%	21%	22%	0%	100%
H. Transportation and storage	0%	1%	1%	63%	34%	2%	0%	100%
I. Accommodation and food service activities	0%	0%	0%	61%	32%	6%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	7%	7%	21%	64%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	100%	0%	100%
L. Financial and insurance activities	0%	0%	4%	6%	16%	73%	1%	100%
M. Real estate activities	0%	2%	5%	16%	9%	66%	2%	100%
N. Professional, scientific and technical activities	0%	1%	2%	32%	30%	35%	0%	100%
O. Administrative and support service activities	0%	0%	0%	34%	39%	28%	0%	100%
P. Public administration and defence; compulsory social security	0%	36%	0%	19%	0%	45%	0%	100%
Q. Education	0%	1%	1%	78%	19%	2%	0%	100%
R. Human health and social work activities	0%	1%	0%	9%	43%	47%	0%	100%
S. Arts, sports and recreation	0%	0%	1%	7%	61%	31%	0%	100%
Total	0%	2%	11%	37%	16%	33%	0%	100%

Calculated climate risk – year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	5%	42%	27%	21%	3%	1%	0%	100%
B. Mining and quarrying	0%	9%	33%	20%	30%	7%	0%	100%
C. Manufacturing	0%	15%	8%	25%	19%	31%	2%	100%
D. Electricity, gas, steam and air conditioning supply	0%	34%	28%	13%	5%	20%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	2%	7%	18%	10%	63%	0%	100%
F. Construction	0%	5%	19%	32%	23%	18%	3%	100%
G. Wholesale and retail trade	0%	2%	7%	25%	34%	27%	5%	100%
H. Transportation and storage	0%	6%	15%	44%	15%	18%	2%	100%
I. Accommodation and food service activities	0%	7%	18%	20%	28%	26%	2%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	13%	40%	14%	23%	10%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	15%	69%	16%	100%
L. Financial and insurance activities	0%	2%	4%	16%	28%	22%	27%	100%

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
M. Real estate activities	0%	1%	2%	6%	29%	37%	25%	100%
N. Professional, scientific and technical activities	0%	3%	5%	9%	37%	33%	13%	100%
O. Administrative and support service activities	0%	6%	8%	8%	25%	41%	12%	100%
P. Public administration and defence; compulsory social security	0%	3%	0%	56%	15%	17%	10%	100%
Q. Education	0%	14%	24%	36%	16%	11%	0%	100%
R. Human health and social work activities	0%	3%	1%	62%	6%	16%	12%	100%
S. Arts, sports and recreation	0%	1%	0%	13%	34%	32%	20%	100%
Total	0%	10%	11%	21%	21%	30%	7%	100%

Calculated transition risk - year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	0%	0%	15%	76%	8%		100%
B. Mining and quarrying	0%	0%	4%	59%	34%	4%		100%
C. Manufacturing	0%	2%	17%	24%	41%	16%		100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	17%	32%	4%	47%		100%
E. Water supply; sewerage, waste management and remediation activities	0%	1%	1%	71%	23%	5%		100%
F. Construction	0%	0%	2%	40%	41%	17%		100%
G. Wholesale and retail trade	0%	1%	1%	12%	76%	11%		100%
H. Transportation and storage	0%	0%	1%	69%	15%	15%		100%
I. Accommodation and food service activities	0%	0%	0%	6%	68%	26%		100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	0%	1%	35%	64%		100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	93%	7%		100%
L. Financial and insurance activities	0%	0%	0%	5%	23%	72%		100%
M. Real estate activities	0%	0%	0%	8%	20%	71%		100%
N. Professional, scientific and technical activities	0%	0%	1%	7%	45%	39%		100%
O. Administrative and support service activities	0%	0%	0%	37%	36%	28%		100%
P. Public administration and defence; compulsory social security	0%	0%	0%	59%	29%	12%		100%
Q. Education	0%	0%	0%	2%	71%	26%		100%
R. Human health and social work activities	0%	0%	0%	3%	73%	24%		100%
S. Arts, sports and recreation	0%	0%	0%	1%	63%	36%		100%
Total	0%	0%	3%	19%	57%	20%		100%

Calculated environmental risk - year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	4%	9%	47%	38%	2%	0%	100%
B. Mining and quarrying	9%	25%	38%	27%	2%	0%	0%	100%
C. Manufacturing	0%	14%	24%	53%	3%	3%	2%	100%
D. Electricity, gas, steam and air conditioning supply	0%	30%	9%	11%	41%	9%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	2%	8%	24%	66%	0%	0%	0%	100%
F. Construction	0%	7%	25%	29%	13%	19%	6%	100%
G. Wholesale and retail trade	0%	3%	9%	35%	9%	43%	1%	100%
H. Transportation and storage	0%	1%	3%	77%	11%	8%	1%	100%
I. Accommodation and food service activities	0%	1%	2%	60%	20%	15%	1%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	3%	2%	15%	33%	29%	18%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	84%	16%	100%
L. Financial and insurance activities	0%	0%	0%	18%	20%	10%	51%	100%
M. Real estate activities	0%	1%	5%	10%	5%	16%	63%	100%
N. Professional, scientific and technical activities	0%	0%	2%	31%	12%	33%	22%	100%
O. Administrative and support service activities	0%	0%	0%	53%	7%	40%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	56%	13%	0%	30%	1%	100%
Q. Education	0%	0%	5%	34%	2%	59%	0%	100%
R. Human health and social work activities	0%	0%	1%	66%	1%	26%	7%	100%
S. Arts, sports and recreation	0%	0%	1%	29%	6%	56%	8%	100%
Total	0%	5%	10%	34%	12%	32%	8%	100%

Calculated governance risk – year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	8%	74%	16%	1%	0%	100%
B. Mining and quarrying	0%	10%	22%	54%	13%	0%	0%	100%
C. Manufacturing	0%	6%	12%	51%	21%	11%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	9%	27%	13%	19%	31%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	0%	9%	13%	19%	21%	39%	0%	100%
F. Construction	0%	17%	23%	27%	21%	12%	0%	100%
G. Wholesale and retail trade	0%	5%	5%	34%	45%	11%	0%	100%
H. Transportation and storage	0%	1%	8%	52%	16%	23%	0%	100%
I. Accommodation and food service activities	0%	1%	8%	23%	60%	8%	0%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	0%	4%	11%	48%	36%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	99%	0%	100%
L. Financial and insurance activities	0%	3%	7%	21%	11%	59%	0%	100%
M. Real estate activities	0%	3%	3%	15%	25%	54%	0%	100%

N. Professional, scientific and technical activities	0%	0%	1%	12%	29%	54%	3%	100%
O. Administrative and support service activities	0%	0%	6%	35%	2%	58%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	12%	47%	10%	31%	0%	100%
Q. Education	0%	0%	2%	6%	36%	57%	0%	100%
R. Human health and social work activities	0%	1%	1%	6%	73%	18%	0%	100%
S. Arts, sports and recreation	0%	0%	3%	8%	36%	53%	0%	100%
Total	0%	4%	8%	30%	23%	34%	0%	100%

Calculated social risk – year 2024

Sectors of activity (NACE Rev.2.1)	Foarte ridicat	Ridicat	Mediu Ridicat	Mediu	Mediu scăzut	Scăzut	Foarte Scăzut	Total
A. Agriculture, forestry and fishing	0%	1%	40%	43%	10%	6%	0%	100%
B. Mining and quarrying	9%	13%	16%	59%	2%	0%	0%	100%
C. Manufacturing	0%	10%	28%	45%	11%	6%	0%	100%
D. Electricity, gas, steam and air conditioning supply	0%	0%	15%	32%	15%	37%	0%	100%
E. Water supply; sewerage, waste management and remediation activities	2%	5%	10%	67%	13%	3%	0%	100%
F. Construction	0%	13%	13%	46%	4%	14%	9%	100%
G. Wholesale and retail trade	0%	1%	5%	45%	26%	23%	0%	100%
H. Transportation and storage	0%	1%	2%	56%	38%	3%	0%	100%
I. Accommodation and food service activities	0%	0%	1%	56%	23%	20%	1%	100%
J. Publishing, broadcasting, and content production and distribution activities	0%	3%	0%	42%	10%	45%	0%	100%
K. Telecommunication, computer programming, consulting, computing infrastructure and other information service activities	0%	0%	0%	0%	0%	100%	0%	100%
L. Financial and insurance activities	0%	0%	5%	6%	17%	64%	7%	100%
M. Real estate activities	0%	2%	2%	15%	7%	71%	2%	100%
N. Professional, scientific and technical activities	0%	0%	3%	29%	28%	39%	0%	100%
O. Administrative and support service activities	0%	0%	0%	20%	34%	46%	0%	100%
P. Public administration and defence; compulsory social security	0%	0%	56%	10%	3%	31%	0%	100%
Q. Education	0%	1%	1%	88%	9%	1%	0%	100%
R. Human health and social work activities	0%	0%	1%	66%	16%	17%	0%	100%
S. Arts, sports and recreation	0%	0%	1%	7%	50%	42%	0%	100%
Total	0%	3%	11%	37%	15%	33%	1%	100%

Engaging with customers and supporting the transition

In line with its sustainability strategy and the goal of supporting the economy's transition toward business models with a low environmental impact, the BT Group maintains an ongoing dialogue with entrepreneurs and companies in Romania regarding the opportunities and benefits associated with the green transition and sustainable financing.

In this context, the bank organizes and participates in events dedicated to the business community, designed to facilitate companies' access to relevant information regarding available technical solutions, financing opportunities, and the tools necessary for implementing energy efficiency projects, renewable energy production, and decarbonization.

In 2025, the BT Group organized and hosted several events dedicated to dialogue with companies regarding the transition to sustainable business models, as follows:

In partnership with Servelect, the event "Industry in Transition" (April 15, 2025) took place in Cluj-Napoca, addressing the development and implementation of decarbonization plans and the importance of reducing emissions in the industrial sector.

Additionally, in Bucharest on September 30, 2025, the bank organized the event "VSME for SMEs: Dialogues on Sustainability, Risk, and the Future," aimed at SME clients and dedicated to promoting voluntary sustainability reporting and understanding emerging ESG requirements.

In addition, the NZEB fair, held in two editions during 2025 (June 11–14 and October 23–25), served as an important platform for promoting sustainable construction. During these editions, Banca Transilvania served as the main sponsor, supporting the promotion of the Near Zero Energy Building (NZEB) concept and high-performance green buildings from the perspective of energy efficiency and carbon footprint reduction.

Through these initiatives, the BT Group contributes to raising awareness within the business community regarding sustainable investment opportunities and supports companies in adapting to the requirements of the climate transition and the low-carbon economy.

Evolution of the portfolio of sustainable financing granted to companies

Banca Transilvania's sustainable financing activity has continued to grow at a steady pace, reflecting customers' increasing interest in investments that help optimize energy costs and, by extension, improve business and financial performance. At the same time, these initiatives have a positive impact on the environment by reducing the carbon footprint. The BT Group's approach to financing with a positive impact on the environment is grounded in the realities of the business environment and aligns with customer interest.

In 2025, the total volume of green financing, according to internal methodology, granted to corporate clients increased to 2,180.2 million RON from 1,787.6 million RON in 2024, representing an increase of approximately 22% compared to the previous year and confirming the expansion of financing activities for projects with environmental benefits.

The main categories of funded projects were projects for renewable energy production, the construction of green buildings, and financing dedicated to environmental protection.

Breakdown of green financing provided to companies (in millions of RON)

Category	2025	2024	Variance 2025 vs. 2024	Share in total loans granted in 2025
Renewable Energy	859.4	1,050.3	-18.2%	39.4%
Green Buildings	938.5	516.8	+81.6%	43.0%
Special Environmental Funding	320.5	182.0	+76.1%	14.7%
Other	61.7	38.4	+60.7%	2.8%
Total	2,180.2	1,787.6	+22.0%	100%

In 2025, the structure of green financing granted shows a significant increase in financing for green buildings and special environmental projects (waste collection and recycling, energy storage projects, or grid stabilization, etc.).

The volume of financing for renewable energy projects was lower compared to the previous year, a trend that reflects the specific dynamics of investments in this sector, characterized by projects of varying sizes and an uneven distribution of financing across periods.

The “Others” category includes financing for energy efficiency projects, efficient use of water resources, blue finance projects, and sustainable transportation.

Structure of the green financing portfolio granted to companies (outstanding balance)

At the portfolio level, the total balance of green financing continued to grow, reaching approximately 4.30 billion RON as of December 31, 2025, compared to 2.66 billion RON at the end of 2024.

Category	Balance 2025 (mil.RON)	Balance 2024 (mil.RON)	Variance 2025 vs. 2024	Share in 2025 Balance
Renewable Energy	1,930.1	728,7	+164.9%	44.9%
Green Buildings	1,864.3	1,615.4	+15.4%	43.4%

Category	Balance 2025 (mil.RON)	Balance 2024 (mil.RON)	Variance 2025 vs. 2024	Share in 2025 Balance
Special Environmental Funding	269.1	118.1	+127.9%	6.3%
Other	231.8	193.6	+19.7%	5.4%
Total	4,295.3	2,655.8	+61.7%	100%

The portfolio structure shows a significant concentration in the two main categories, renewable energy and green buildings, which together account for approximately 88% of the total green financing portfolio.

The most significant increase was recorded in financing for renewable energy projects, whose outstanding balance reached 1,930.1 million RON at the end of 2025, compared to 728.7 million RON in 2024. At the same time, financing for green buildings continued to represent a major pillar of the portfolio, with a balance of 1,864.3 million RON.

The evolution of the portfolio balance reflects both the financing granted during the period and the specific characteristics of the financed projects, including their duration and the investment implementation schedule, which determine the progressive use of approved funds. Thus, changes in annual disbursements are gradually reflected in the portfolio structure, and larger investment projects may influence the evolution of balances in subsequent reporting periods.

The evolution of the green financing portfolio is reflected both in the increase in the total financing balance and in the number of financings in the portfolio. As of December 31, 2025, the balance of green financing reached approximately 4.30 billion RON, and the portfolio included 988 financing transactions, of which 418 were granted during 2025. By comparison, as of December 31, 2024, the portfolio balance was 2.66 billion RON, consisting of 734 loans, of which 245 were granted during 2024. This trend reflects the sustained pace of lending during the period under review, as well as the granularity of the supported projects and a low level of concentration at the project level.

The BT Group's Sustainability Strategy for 2026–2028 places the issuance of green loans, in accordance with internal methodology and validated through the CAFI and Green Gateway tools, at the center of its action plans, with a target of granting 6.5 billion RON in green loans during 2025–2028. The initial target for green loans granted to companies was set at 5 billion RON for the 2025–2027 period, reflecting the target set for 2025. The development and promotion of green financing products also aim to meet both the requirements for compliance with the EU Taxonomy and the real needs of the economy, with an emphasis on energy efficiency, reducing CO₂ emissions, utilizing renewable resources, and adapting to climate risks.

Sustainable bonds

Banca Transilvania also utilizes financing instruments from international financial markets to support the development of its sustainable financing portfolio and to mobilize capital for projects with a positive impact on the environment and society. The bank's sustainable bond issuances are structured in accordance with the BT Group's Sustainable Finance Framework described above, with the funds raised being used to finance or refinance eligible projects defined therein.

As part of the issuance program totaling EUR 1.5 billion, Banca Transilvania carried out three consecutive sustainable bond issuances, the first two listed on the Dublin Stock Exchange and the third on the Bucharest Stock Exchange. The first issuance was for EUR 500 million in the form of senior unsecured bonds, followed in September 2024 by a second issuance of EUR 700 million, and in 2025 by a third issuance of EUR 300 million listed on the Bucharest Stock Exchange. The issuances attracted significant interest from international investors with specific mandates for investments that have a positive impact on the environment and/or society, reflecting their confidence in the BT Group's sustainable financing strategy.

The funds raised are directed toward eligible sustainable projects, such as green buildings, renewable energy, clean transportation, and organic agriculture, as well as toward financing small and medium-sized enterprises, including in less developed regions, while also contributing to improved access to health and education services.

Banca Transilvania periodically publishes allocation and impact reports for its sustainable bond issuances, confirming that the funds are used in accordance with the criteria established in the Sustainable Finance Framework.

The first Allocation and Impact Report, published in 2024 for lottery ticket XS2724401588, confirmed the full (100%) allocation of net proceeds through December 31, 2023. The second report, published in 2025, covering issues XS2724401588 and XS2908597433, confirmed the full (100%) allocation of outstanding sustainable bonds totaling EUR 1.2 billion. The financed projects contributed to the annual avoidance of approximately 847,548 tCO₂e, as well as to generating positive economic effects on gross value added and economic activity in Romania.

For the latest sustainable bond issuance in 2025 with ISIN XS3109437387, the bank is set to publish its third Allocation and Impact Report during the first half of 2026, which will detail the use of the funds raised and the impact of the financed projects.

Complementary reports on the impact of financing provided to SMEs (published in 2024 and 2025) highlight the contribution of this financing to job creation, expanding access to financing for SMEs, and supporting economic activity across various sectors of the Romanian economy.

Trends in sustainable financing in the retail segment

In the mortgage sector, green loans (homes with an EPC A energy performance certificate) saw significant growth, confirming customers' growing interest in homes with high energy performance.

In 2025, green mortgage loans saw significant growth both in volume and as a share of new lending: the value of financing granted reached 1,198.9 million RON, compared to 586.9 million RON in 2024, and the number of green mortgages granted rose to 3,458 (from 1,747 in 2024). From the perspective of the production mix, green mortgages accounted for 19.5% of mortgage loans granted in 2025, compared to 13.2% in 2024, meaning that approximately 1 in 5 newly granted mortgage loans fall into the green category (compared to approximately 1 in 8 in the previous year).

This trend is also reflected in the evolution of the outstanding balance: the balance of green mortgages rose to 2,945.9 million RON at the end of 2025 (from 2,265.4 million RON in 2024), while maintaining a stable share of the total mortgage and real estate loan portfolio (11.9% in 2025 compared to 11.8% in 2024).

Across the entire retail portfolio, green financing reached 2,943.5 million RON in 2025, compared to 2,266.9 million RON in 2024, accounting for 7.5% of the total portfolio (compared to 7.4% in the previous year).

Evolution of green mortgage lending

Indicator	2025	2024
Number of green mortgages granted	3,458	1,747
Value of green mortgages granted (million RON)	1,198.9	586.9
Share of total mortgage loans granted	19.5%	13.2%
Equivalent in loans granted	aproximativ 1 din 5 credite	aproximativ 1 din 8 credite
Year-end green mortgage balance (million RON)	2,945.9	2,265.4
Share of total mortgage and real estate loan portfolio	11.9%	11.8%

Green mortgage loans include financing for the purchase or construction of homes with an EPC A energy performance certificate or equivalent, in accordance with the internal criteria used by Banca Transilvania for classifying green financing in the retail segment. The shares presented in the table are calculated relative to the total mortgage loans granted during

the year (for new production indicators) and to the total mortgage and real estate loan portfolio outstanding at the end of the period (for portfolio balance indicators).

Contribution of specialized divisions to portfolio development

Banca Transilvania is strengthening its position in strategic economic sectors, such as the medical and agribusiness sectors, through specialized divisions that offer financial solutions tailored to the specific needs of each sector and contribute to the sustainable development of the loan portfolio.

Specialized divisions are key pillars in BT's portfolio development strategy, ensuring an approach tailored to the specific needs of sectors with significant economic and social impact. Both agribusiness and the medical sector are areas with a structural role in the Romanian economy, characterized by high investment needs and a significant contribution to employment.

The Agribusiness Division continued to play an essential role in supporting the agricultural sector, an area of major relevance to the Romanian economy. In 2025, the division recorded a market share of 26.36%, up from the 21.28% reported at the end of 2024, reflecting the strengthening of Banca Transilvania's position in this segment. As of December 31, 2025, the division's portfolio included 35,606 active customers, and the outstanding loan balance reached 6.83 billion RON. Thus, Banca Transilvania has strengthened capabilities to meet the financing needs of a sector exposed to climate risks and economic volatility.

The size of the portfolio and the high number of active customers highlight the strategic importance of this segment for the Bank's overall portfolio and for supporting the rural economy and agri-food supply chains.

The Corporate Banking Division, in turn, continued to grow, expanding its customer base and covering an increasingly broad range of activities, including those in the large-corporate segment. By the end of 2025, the division served 34,729 companies, compared to 31,933 in the previous year. This growth was reflected in increased lending activity, with new loan origination reaching 1.97 billion RON in 2025, compared to 1.2 billion RON in 2024. At the same time, the outstanding loan balance increased from 2.56 billion RON in 2024 to 2.76 billion RON in 2025, and the deposit balance rose from approximately 2.9 billion RON to 3.1 billion RON, reflecting a strengthened financial relationship with this customer segment.

In the healthcare sector, the growth in the customer base and the volume of new financing granted indicates an intensification of lending activity, supported by ongoing investments in infrastructure equipment, and the expansion of healthcare service delivery capabilities. The positive trend in loan and deposit balances suggests the strengthening of long-term relationships with this customer segment and an increase in the degree of financial intermediation.

Overall, the contribution of the specialized divisions reflects balanced portfolio growth, based both on expanding the customer base and on supporting investments in sectors of high economic and social relevance for Romania. This approach allows Banca Transilvania to strengthen its role as a financier of the real economy and to support the sustainable development of key sectors.

Banca Transilvania has also integrated sustainable financing practices within its subsidiaries.

The subsidiaries of the Banca Transilvania Group contribute to the implementation of the sustainable financing strategy by supporting investments in renewable energy, energy efficiency, and low-emission mobility. Through the activities carried out by Victoriabank and BT Leasing Moldova in the Republic of Moldova, as well as by BT Microfinanțare and BT Leasing Romania, sustainable financing is being extended to new customer segments and project types, strengthening the BT Group's role in supporting the transition to a more sustainable economy in the markets where it operates.

Victoriabank

In 2025, Victoriabank continued to support renewable energy and energy efficiency projects by granting green loans, leveraging Banca Transilvania's expertise and the assistance provided by the European Bank for Reconstruction and Development (EBRD). At the same time, the funding base was diversified through the Green for Growth Fund (GGF) partnership, helping to strengthen the bank's capacity to support investments with a positive environmental impact.

As of December 31, 2025, Victoriabank had financed 14 clients, with a total value of approximately 75 million RON in loans, with the portfolio focused on renewable energy and energy efficiency projects. This development is in line with the strategy to support energy transition, continuing the directions established in previous years.

BT Microfinantare

Through the activities of BT Mic, the Group contributes to expanding access to financing for small businesses and early-stage entrepreneurs. In 2025, approximately 70% of new financed clients received support from the company as their primary lender, and 23.4% of financed clients were startups, defined as businesses no more than 18 months old.

BT Leasing Romania

Through its leasing subsidiaries, the BT Group supports the transition to low-emission mobility solutions, offering customers the opportunity to finance electric and hybrid vehicles, adapted to new energy efficiency requirements and environmental impact reduction goals.

In 2025, BT Leasing Romania made a significant contribution to the development of sustainable mobility, reflected both in the volume of financing granted and in the portfolio structure. Approximately half of the leases granted during 2025 were for electric or hybrid vehicles, with a cumulative value of nearly 1,909 million RON

This trend was also reflected in the portfolio: by the end of 2025, electric and hybrid vehicles accounted for 58% of the total leasing portfolio, confirming the business's consistent focus on low-emission mobility solutions. In terms of the number of financed vehicles, their share increased significantly, highlighting a structural shift in the automotive portfolio, not just a one-off increase in volumes.

In particular, both the electric vehicle segment and the hybrid vehicle segment recorded substantial growth in 2025 compared to 2024, both in terms of the number of units financed and the outstanding balance, consolidating BT Leasing Romania's position as a key player in supporting the transition to low-emission mobility solutions.

The number of electric and hybrid vehicles financed, as well as the outstanding balance of the related financing, are presented in the table below.

Portfolio of financed electric and hybrid vehicles – BT Leasing Romania

Category	2025		2024		Variance number	Variance balance
	No.	(RON mil.)	No.	(RON mil.)	2025 vs 2024	2025 vs 2024
Electric cars	3,115	267	2,383	208	+30.7%	+28.4%
Hybrid cars	19,630	2,164	13,463	1,495	+45.8%	+44.7%
Total	22,745	2,431	15,846	1,702	+43.5%	+42.9%

BT Leasing Moldova

In 2025, BT Leasing Moldova continued to develop a portfolio focused on low-emission mobility solutions by financing electric and hybrid vehicles and actively promoting these solutions among customers. This approach reflects the subsidiary's commitment to supporting the modernization of the vehicle fleet and reducing environmental impact, particularly in urban areas.

The partnership with the Green for Growth Fund (GGF) was strengthened, facilitating access to resources dedicated to projects with a positive environmental impact and supporting the development of sustainable mobility. At the same time, the launch of the Leasing ECO product, active since 2025, contributed to increasing green financing in the portfolio and stimulating demand for electric and hybrid vehicles.

The portfolio's growth was reflected both in the increase in the number of financed vehicles and in the rise in the outstanding balance of related financing. At the end of 2025, electric

and hybrid vehicles accounted for 37% of the auto portfolio balance, compared to 35% in 2024, and in terms of the number of units financed, their share increased from 27% to 33%. This trend indicates a progressive shift of the portfolio toward sustainable mobility solutions, with an increasingly significant contribution from the green segment to BT Leasing Moldova's operations.

The number of financed electric and hybrid vehicles, as well as the outstanding balance of the related financing, are presented in the table below.

Portfolio of financed electric and hybrid vehicles – BT Leasing Moldova

Category	2025		2024		Variance number	Variance balance
	No.	(RON mil.)	No.	(RON mil.)	2025 vs 2024	No.
Electric cars	102	8	56	5	+82.1%	+60.0%
Hybrid cars	559	57	488	49	+14.5%	+16.3%
Total	661	65	544	54	+21.5%	+20.4%

Green and social projects supported by BT

1. Green buildings and sustainable urban development

Alecsandri Estates - The Landmark, București

Alecsandri Estates S.R.L. is a project company within the Vectr group, which owns and manages The Landmark office complex, located in the ultra-central area of Bucharest. The project is recognised on the local office market as a landmark asset, with high potential for modernisation and improved operational and sustainability performance.

Banca Transilvania granted financing through which it took over the existing exposure to the project, facilitating a more efficient use of internal resources at Vectr group level. This financing created the necessary framework for accelerating an extensive technical and operational transformation process, supporting significant investments aimed at improving the asset's ESG performance.

Following this modernisation process, The Landmark complex became a benchmark for sustainability and performance on the Romanian office market, obtaining the BREEAM In-Use – Outstanding certification, with a score of over 88% (6 stars), for both the Asset and Management components, as well as the WELL Health-Safety certification, which confirms high standards of health, safety and well-being for occupants.

BE STRONG TENNIS – Atlas Academy

BE STRONG TENNIS is a company operating in the field of sports services and leisure activities, with a focus on tennis and football. In 2018, the company established ATLAS Academy, a tennis academy dedicated to training children and young people aged between 3 and 15, as well as providing a high-quality sports experience for adults passionate about tennis. Starting with 2019, the activity was expanded through the launch of the Football Academy, where children aged between 5 and 12 are trained. The academy benefits from the sporting expertise of Emil Săndoi, a renowned athlete, who holds the role of honorary president and coordinating coach.

The academy's activity includes performance assessment of participants, the development of individual training plans and participation in local and national competitions, carried out within a sports infrastructure that includes two tennis courts and two football/foot-tennis courts, as well as equipment dedicated to sports training.

The investment project supported by Banca Transilvania through financing aims at the development of a new building for a multifunctional sports centre, designed as a modern space dedicated to promoting health and well-being within the local community. The centre will provide accessible, high-quality sports and recreational facilities for a broad audience and will act as a catalyst for the development of sports activities and social interaction.

The building is designed as a green building, with energy performance exceeding the NZEB standard, conceived not only as a training facility but as a community hub that contributes to improving quality of life, encourages an active lifestyle and supports the development of sports talent among children and young people.

Viva Residence – green residential project

Viva Residence is one of the most dynamic residential developments in the southern area of Bucharest, located near Tudor Arghezi Park and the Apărătorii Patriei metro station. The project stands out through well-designed functionality and an efficient layout of buildings, reflecting the developer's vision of creating a sustainable, spacious, comfortable and safe residential community, harmoniously integrated into the urban environment.

Banca Transilvania granted an investment loan for the development of a new residential project, designed as a model for modern housing in Romania. The project is green pre-certified by the Romanian Green Building Council (RoGBC), a certification that confirms the integration of advanced construction and technological solutions aimed at energy efficiency and reducing environmental impact.

The residential complex benefits from an enhanced construction system, including high-performance building insulation, the use of renewable energy through photovoltaic panels installed on rooftops, underfloor heating systems and energy consumption monitoring. In

addition, the project integrates large glazed surfaces, LED lighting and electric vehicle charging stations, addressing the needs of residents adopting modern housing and mobility solutions. Through these features, Viva Residence contributes to the development of an energy-efficient living environment oriented towards long-term quality of life.

2. Sustainable transport and green logistics

Railport Arad – intermodal terminal

Railport Arad is the first container terminal in Romania, inaugurated in September 2009, following a significant investment in logistics infrastructure. The terminal is located in Curtici, near the Hungarian border, on the Pan-European Orient / East-Med corridor (RFC7), and covers an area of over 10 hectares. Through its strategic positioning and dedicated infrastructure, Railport Arad provides a viable solution for combined transport, contributing to the development of intermodal traffic and promoting a more efficient and less polluting transport alternative, in line with the European objective of shifting freight flows from road to rail.

The financing granted in 2025 by Banca Transilvania primarily aimed to overcome existing capacity constraints and increase the terminal's operational efficiency, with a direct impact on the sustainability of intermodal transport in the region. The investment targeted the extension of five railway lines and two shunting lines, enabling the operation of trains with a length of up to 740 metres, as well as the implementation of digital solutions for workflow automation, aimed at optimising operational processes.

At the same time, the project included equipping the terminal with a photovoltaic system for the generation of energy from renewable sources, contributing to improved energy efficiency and the reduction of the carbon footprint of the activities carried out. Through these investments, Railport Arad strengthens its role as a key infrastructure for sustainable intermodal transport and supports the transition towards more efficient and environmentally friendly logistics solutions.

3. Renewable energy

Baboia Solar Plant – photovoltaic power plant

The ENERY Group is one of the leaders in the Romanian market in the transition towards green energy, through the acquisition, development, construction and operation of large-scale renewable energy power plants. The Group, with 98 sites, has an operational portfolio of 566 MW and provides clean and reliable electricity to a wide range of communities, companies and utilities.

At the same time, it is developing greenfield projects in other Central and Eastern European markets, in countries such as the Czech Republic, Slovakia, Bulgaria, Austria, Estonia and Latvia.

Baboia Solar Plant, part of the ENERY Group, is developing in Romania a large-scale photovoltaic power plant located in Ogrezeni, Giurgiu County. The financing provided by Banca Transilvania is part of a syndicated loan aimed at developing 761 MWp of installed capacity and over 1,000 MWh of storage capacity. The ENERY Group's investments in Romania include 9 photovoltaic plants, 4 wind farms and 2 hydropower plants, totalling over 205 MW of installed capacity.

Nova Power & Gas – energy storage project

Nova Power & Gas, a 100% Romanian company, electricity producer and supplier of natural gas and electricity, is one of the pillars of the E-INFRA Group, alongside Electrogrup, Direct One, Netcity and WESEE. Together, the group of companies provides some of the most advanced infrastructure services in energy, telecommunications, construction and energy solutions for sustainable cities in Romania. The Group has production capacities with an installed capacity of over 500 MW, while production from renewable sources alone exceeds 350 GWh per year.

The investment financed in 2025 aims at the financing/refinancing of the largest energy storage facility in Romania, located in Florești, with a storage capacity of 200 MW / 400 MWh.

The company's plans until 2028 include the development of a new 160 MW combined cycle gas power plant and the development of new energy storage facilities with a capacity of 600 MW / 1,200 MWh.

4. Special environmental and circular economy financing

Ecosistem SRL

Ecosistem SRL is a company based in Vrancea County, with over 20 years of activity, specialized in the recovery and treatment of recyclable materials. The company manages a wide range of waste streams, including cardboard, paper, plastic, wood, metal, glass and waste electrical and electronic equipment (WEEE). Within its operational platform, activities such as collection, sorting and volume reduction of waste through shredding or pressing are carried out, representing preliminary steps necessary to prepare materials for recycling. Through its operations, Ecosistem SRL contributes annually to reintroducing over 10,000 tonnes of materials into the economic cycle, which would otherwise be disposed of as waste.

The financing provided by Banca Transilvania supported an investment program implemented under a project financed through the National Recovery and Resilience Plan (NRRP), in the form of investment loans used as co-financing. The project aimed at constructing new production facilities and equipping them with technological equipment dedicated to waste recycling, including weighing systems, sorting and drying lines for LDPE/LLDPE plastic waste, granulation lines and shredding equipment. In addition, the investment included the installation of photovoltaic systems with a capacity of 176 kW, supporting the use of renewable energy in operational activities.

Complementing these investments, the company also contracted a working capital loan guaranteed by the European Investment Fund, ensuring operational continuity and stability of business flows. Through these financings, Ecosistem SRL strengthens its capacity to transform waste into reusable raw materials and contributes to the development of the circular economy, with a positive impact on the environment and resource efficiency.

MINET S.A.

Founded in 1981, MINET S.A. is the largest nonwoven textiles producer in Romania, with fully Romanian capital and part of the Minet Group. The company holds a strong market position, with its products being used across a wide range of industries, including construction (underground drainage systems, geomembrane protection in waste storage, anti-erosion barriers in flood-prone areas), furniture manufacturing, cosmetics (wet wipes), and the textile industry (fillings for pillows and duvets, quilted materials).

The investment loans granted aim to support the development of a dedicated textile waste recycling facility, with the primary objective of valorizing recycled materials by integrating at least 50% recycled content into the manufacturing process of finished products. Textile waste is highly polluting and rarely recycled, and MINET S.A.'s activity is expected to make a significant contribution to the development of the circular economy in Romania.

The investment includes the construction of a production hall and the acquisition of equipment based on Best Available Technology (BAT), featuring integrated systems for operation, monitoring and intervention, IoT-enabled technologies and a high level of automation. The facility and equipment will be powered by a 100 kW rooftop photovoltaic system, supporting energy efficiency in the production process.

Professional Recycle

Established in 2010, Professional Recycle is one of Romania's leading companies in the plastic recycling sector, specializing exclusively in PET recycling. Through a business model focused on quality, professionalism and strong partnerships with external stakeholders, the company has rapidly established itself in the market and contributed to the development of an efficient value chain for recyclable materials. Its focus on PET recycling reflects the superior efficiency of this process in terms of resource use and climate impact: producing

a bottle from recycled PET requires approximately 75% less energy compared to virgin material, and each tonne of recycled PET (rPET) avoids around 1.5 tonnes of CO₂ emissions compared to producing an equivalent amount of new PET.

Banca Transilvania provided a working capital loan to support the smooth functioning of the entire recycling chain, from collection to processing and reintegration of recycled raw materials into production. This financing supports the company's operational continuity and the efficiency of recycling flows, contributing to the strengthening of the circular economy.

Professional Recycle's activity is closely linked to the Deposit Return System (DRS) in Romania, managed by RetuRO, which represents the main source of PET packaging collected for recycling. In this context, the company's investment plans, aimed at doubling its recycling capacity, will accelerate the valorisation of collected materials and support the reduction of environmental impact through the reuse of recycled PET as a raw material.

Romcarbon SA

Romcarbon S.A. is a joint-stock company based in Buzău County, listed on the Bucharest Stock Exchange under the symbol ROCE, with a long-standing presence in the plastics industry, established in 1952. The company is one of the leading plastic packaging producers in Romania, specializing in the processing of polyethylene, polypropylene, PVC and polystyrene. Romcarbon's operations are certified in accordance with ISO 9001 and ISO 14001 standards, while its recycling activities are certified under EuCertPlast, the European certification scheme for plastics recyclers. Since 2012, the company has complemented its packaging production activities with a dedicated post-consumer plastic waste recycling segment, contributing to the transition towards a circular economy. Its operations are organized across several business lines, including the production of automotive filters, respiratory protection equipment (gas masks and industrial masks), plastic films and bags, as well as road signage.

The financing provided by Banca Transilvania supported the implementation of a project co-financed through the National Recovery and Resilience Plan (NRRP), with the main objective of establishing a modern facility for recycling and recovery of plastic waste. The investment loans were used for the acquisition of technological equipment to be installed in the new unit, including the replacement of existing sorting and washing lines for plastic fractions, modernization of waste sorting and shredding processes, and the implementation of solutions for treating wastewater generated during recycling operations. The investment also includes the installation of an extruder for recycling shredded polypropylene and polyethylene films and bags, contributing to increased efficiency and processing capacity of recycled materials.

The recycling of post-consumer plastic waste represents a strategic priority at the European Union level. The Regulation on packaging and packaging waste sets ambitious targets, including for Romania, such as the requirement that by 2030, polypropylene and

polyethylene packaging must contain at least 35% recycled material, as well as restrictions on placing certain non-recyclable packaging on the market. Romcarbon's investments in modernization and expansion of recycling capacities directly address these regulatory requirements, contributing to increased material circularity and reduced environmental impact.

Social impact financing – healthcare sector, Medical Division

Scan Expert

Scan Expert is a medical company specialized in high-performance medical imaging, supporting the local healthcare system by providing fast, accurate and detailed diagnostic investigations. The company's activity is based on the use of state-of-the-art equipment with low energy consumption, complemented by advanced software and IT infrastructure, including AI-based image processing solutions.

The company provides medical imaging services both for emergency care units and on an outpatient basis, with a national presence through its centers located in Iași (two clinics), Pașcani (Iași County), Timișoara (two clinics), Roman, Galați, Brașov and Botoșani (two clinics), including through its group company Optim Diagnostic. This extensive network contributes to improving patient access to advanced imaging services across multiple regions of Romania.

Through financing provided by Banca Transilvania, Scan Expert has continuously expanded its technological capabilities, investing in modern medical imaging equipment such as magnetic resonance imaging (MRI), computed tomography (CT), ultrasound, radiology (X-ray), mammography and colonoscopy. To ensure broad accessibility of its services, the company has contracts in place with local Health Insurance Houses, facilitating patient access to reimbursed advanced imaging investigations. In this context, the development of capabilities and infrastructure dedicated to cardiac imaging represents one of the company's key strategic directions.

In 2025, Banca Transilvania financed the acquisition of state-of-the-art equipment enabling both standard and specialized imaging investigations, including:

- Cardiac stress MRI (myocardial perfusion with adenosine);
- Pelvic MRI with dedicated protocols for accurate diagnosis of endometriosis;
- MRI with sedation for pediatric patients;
- Digital mammography with 3D tomosynthesis.

Among the key equipment financed in 2025 are:

- Siemens MAGNETOM Vida 3 Tesla MRI, a high-performance system equipped with BioMatrix technology, designed to automatically adapt to each patient's anatomical and physiological variability;
- Siemens MAGNETOM Sola 1.5 Tesla MRI, built on a high-performance platform integrating power, intelligence and processing speed;
- Siemens MAMMOMAT Revelation mammography system, enabling full 3D breast imaging through wide-angle (50°) tomosynthesis technology.

Through these investments and the integration of advanced imaging technologies, Scan Expert contributes to improving the quality of medical services, reducing diagnostic time and enhancing patient access to high-precision healthcare, supporting the development of a modern and efficient medical infrastructure.

Onco Systems SRL – Regional Institute of Oncology Iași

Onco Systems is a company specialized in the provision and implementation of integrated solutions for radiotherapy and oncology, operating in the high-technology medical equipment market. The company collaborates with leading international manufacturers and with both public and private medical institutions in Romania, contributing to the modernization of oncology infrastructure at national level.

Through its technical expertise and experience in complex projects, Onco Systems delivers end-to-end services, including equipment supply, installation, commissioning, medical staff training and specialized maintenance.

In 2025, Banca Transilvania provided financing to Onco Systems SRL for the implementation of a project aimed at equipping the Regional Institute of Oncology Iași (IRO Iași) with the RADIXACT radiotherapy platform developed by ACCURAY, a state-of-the-art technology designed for advanced cancer treatment.

The RADIXACT system, equipped with SYNCHRONY technology, is among the most advanced radiotherapy platforms available globally. It integrates cutting-edge treatment planning and delivery technologies, enabling real-time adaptation to tumor position and movement, thus ensuring highly precise targeting of tumor formations. This technology enhances treatment effectiveness, reduces associated complications and improves long-term therapeutic outcomes, with a direct impact on patients' quality of life and survival rates.

The financing supports:

- Acquisition of the full RADIXACT system;
- Development and compliance of technical facilities;
- Installation and integration within the existing infrastructure of IRO Iași;

- Commissioning and clinical implementation;
- Training of medical personnel for the use of new technologies;
- Related services and technical support;
- VAT associated with the import of the equipment.

The investment contributes to increasing oncology treatment capacity in the North-East region by modernizing the Radiotherapy Laboratory within IRO Iași and equipping it with high-performance technology. The project will enable the Institute to provide more precise and effective treatment services, align with advancements in medical practice and respond adequately to the complex needs of oncology patients.

The project generates significant social impact through:

- Increased access to high-quality medical services for oncology patients in the North-East region, enabled by the local availability of advanced radiotherapy technology;
- Improved precision and effectiveness of treatments, directly contributing to enhanced quality of life and improved survival rates;
- Modernization of the public healthcare system's technological base and alignment with international standards;
- Strengthening the role of the Regional Institute of Oncology Iași as a regional center of excellence in oncology care.

RETINA Clinic

RETINA Clinic was established in 1998 by Prof. Dr. Florian Baltă and was conceived as a reference medical unit in the field of ophthalmology, built on professional expertise, medical rigor and respect for patients. Over time, the clinic has consolidated its reputation through reliability, professionalism and consistent medical performance, with a mission to provide ophthalmological services at the highest standards and to maintain patients' health as a central priority in medical practice.

In 2025, Banca Transilvania provided financing for the acquisition of the property in which RETINA Clinic operates, supporting the consolidation of a modern medical facility adapted to current ophthalmology requirements and patient needs. This financing contributed to ensuring a stable and high-performance environment for the delivery of medical services, supporting the continuity and development of the services provided.

The clinic is organized across four levels, ensuring an efficient and integrated medical flow. Activities are carried out within a modern outpatient facility, equipped with eight consultation rooms fitted with state-of-the-art medical equipment, as well as two fully equipped operating theatres dedicated to ophthalmic interventions. At ground floor level, the optical shop complements the clinical pathway by offering personalized optical

solutions and specialized advisory services, contributing to the provision of a comprehensive service package for patients.

Medical expertise is supported by a team of 23 physicians, providing consultations and treatments for both children and adults, covering a wide range of specialties, including surgical and medical retina, glaucoma, cataract, uveitis and ocular inflammation, oculoplastics, pediatric ophthalmology and neuro-ophthalmology. Through its modern infrastructure and the expertise of its medical team, RETINA Clinic contributes to improving access to specialized medical services and to enhancing the quality of ophthalmological care.

Transilvania Medical Center – Transilvania Hospital

Transilvania Medical Center represents the first Danish private investment in the medical sector in Romania and is a member of the Danish-Romanian Business Association. The organization has established itself as one of the leading providers of magnetic resonance imaging (MRI) services in Cluj-Napoca, supported by high-performance equipment and a team of highly qualified radiologists.

Transilvania Hospital, developed as an integral part of this medical ecosystem, has become a benchmark both regionally and nationally since its opening, offering comprehensive and complex services, including outpatient consultations, laboratory testing, advanced medical imaging, surgical interventions and inpatient care. The building was designed and constructed from the outset as a hospital facility, with integrated infrastructure, medical equipment and operational layouts forming a unified system aimed at supporting medical excellence and high standards of care.

The hospital was built from the ground up, covering an area of approximately 2,500 sqm, and is designed to ensure efficient medical flows for both patients and medical staff, as well as a functional and comfortable environment. Its inpatient capacity allows for the simultaneous hospitalization of 44 patients, accommodated in single or double rooms. State-of-the-art technology is integrated across both the operating block and imaging infrastructure, with all equipment being of advanced standard.

The hospital is structured across six functional levels, as follows:

- Basement: staff facilities, technical equipment areas and the 3T MRI Imaging Center;
- Ground floor: emergency unit, patient reception, CT Imaging Center, elevator area and admissions office;
- 1st floor: conventional radiology (X-ray) center, RENAR-accredited laboratory, consultation rooms and inpatient wards;
- 2nd floor: inpatient wards;

- 3rd floor: operating block with two operating theatres, biplane angiography system for interventional radiology, sterilization area and Intensive Care Unit;
- 4th floor: administrative area, meeting rooms and medical rehabilitation facilities.

In 2025, Banca Transilvania provided an investment loan for the acquisition of a 4th-generation da Vinci® X 3D-HD robotic surgical system with four arms, including a full package covering installation, space assessment and servicing. The financing supported the implementation of a Robotic Surgery Program, based on a multidisciplinary approach (general surgery, urology, gynecology and thoracic surgery), involving three surgical teams enrolled in a Continuous Training Pathway, proctoring sessions and complementary equipment such as the AirSeal Intelligent Insufflator, DORA – OR Assistant and dedicated endoscopes.

Robotic surgery is a minimally invasive technique in which the surgeon controls a robotic system to perform highly precise interventions. The da Vinci technology accurately replicates the surgeon's movements and enables procedures in complex anatomical areas, offering enhanced control, visibility and safety, reducing the risk of complications and optimizing post-operative recovery. Through the introduction of this technology, Transilvania Hospital provides patients with access to complex surgical procedures performed with a high level of precision, safety and comfort, further strengthening its position as a provider of high-quality medical services.

Green and social projects supported by Victoriabank

In line with its commitment to supporting the transition towards a sustainable, low-carbon economy, Victoriabank continued in 2025 to provide dedicated financing for green projects, with a focus on developing renewable energy generation capacities. Through these financings, the bank supported relevant investments in the energy sector, contributing both to the expansion of local clean energy production and to the modernization of the energy infrastructure in the Republic of Moldova.

The financed projects include:

- Delta Green Energy SRL, which received financing for the acquisition and installation of two Enercon E-70 wind turbines, with a total installed capacity of 4 MW;
- Mistral Tours SRL, beneficiary of financing for the development of a photovoltaic park with a capacity of 1,000 kW;
- Doni Cons SRL, which obtained financing for the construction of a photovoltaic park with a capacity of 1,500 kW, including the acquisition of equipment and related services.

By supporting these projects, Victoriabank contributes to the development of renewable energy generation capacity, the reduction of carbon emissions and the strengthening of energy security. At the same time, the financed investments facilitate the adoption of

modern technologies, reduce dependence on conventional energy sources and support the sustainable development of local communities.

3.4 Entrepreneurial Education and Financial Education

Entrepreneurship education is an essential pillar for the sustainable development of companies, as it provides the tools necessary for efficient resource management, reducing financial risks, and maximizing long-term performance. By strengthening these skills, organizations can enhance their resilience and competitiveness in a constantly changing economic environment. For individual customers, financial education is equally important, helping to build the ability to make informed decisions regarding saving, investing, and responsible spending. This supports personal financial stability and, at the same time, the ability to actively participate in the modern economy. By providing these educational resources to both the business community and the general public, the BT Group contributes to the development of a robust economic ecosystem, supporting individuals in acquiring the skills necessary for effective financial management and for launching sustainable entrepreneurial projects. In this way, the BT Group assumes the role of a facilitator of responsible economic growth and financial inclusion at the national level.

STUP

The STUP project, developed by Banca Transilvania and BT Microfinanțare IFN (BT Mic), represents a unique benchmark in the Romanian entrepreneurial landscape, offering continuous entrepreneurial education through practical programs, thematic modules, and dedicated resources. Unlike other initiatives in the market, STUP stands out for its integrated approach, where each member benefits from relevant training focused on direct business application, with the support of the best specialists and partners in the field.

Free access to the STUP community is a fundamental pillar: any entrepreneur or aspiring entrepreneur can participate in workshops, courses, and events and has access to educational resources at no cost, regardless of whether or not they are a client of the BT financial group. This open framework transforms STUP into an inclusive space where continuous education and the exchange of experiences are accessible to everyone, regardless of the stage of their business or their relationship with the BT Group.

Personalized consulting, networking opportunities, and benefits offered by partners are made available to members at no additional cost to STUP. In essence, STUP becomes a true “one-stop shop” where entrepreneurs can find support for their business development, access financing, exchange ideas, and build valuable connections for the future.

STUP is, thus, a framework where entrepreneurs can come to learn, identify potential partners, access financial resources, and connect with other members of the entrepreneurial community who share a mindset focused on growth and sustainable development. The project functions as a genuine ecosystem, built to stimulate business development and strengthen Romania’s entrepreneurial community. The activities carried out, ranging from seminars to consulting services, are designed to address the real needs

of entrepreneurs, providing a cohesive framework for development, connection, and growth.

STUP is a platform dedicated to supporting entrepreneurs, offering access to entrepreneurial and financial education programs, workshops, seminars, consulting, networking opportunities, and specialized resources. By integrating these components into a unified framework, the initiative contributes to the development of entrepreneurial skills and supports the business environment in Romania. In 2025, the entrepreneurial education programs continued under the umbrella of “Avânt din Stup,” as follows:

- The “**Avânt în antreprenariat**” program – 8 editions by the end of 2025; the program offers a “journey” across 10 sessions, based on the Business Model Canvas, which guides participants through the main areas of a business: understanding the market and customers, the sales process, the marketing plan, financial information, as well as calculating basic financial indicators and creating a cash flow projection for the coming period;
- The “**Sales Boost**” program - structured into 6 modules - offers the opportunity to gain an in-depth understanding of the entire sales process, from prospecting and qualifying potential customers to identifying their needs and through the negotiation process; 7 groups have already benefited from this program;
- The “**Boost in Finance**” program, across its four editions, has brought together entrepreneurs eager to learn practically how to calculate and interpret the key financial indicators of their business, fully identify expenses, and efficiently allocate profits (based on the “Profit First” method), distinguish between Cash Flow and P&L, and plan for sustainable business growth.
- The “**Avânt în digital marketing**” program - which has run for three editions under the umbrella of the “Avânt din Stup” programs - is a practical program designed for entrepreneurs who want to attract new customers and better understand how performance media works, how to implement campaigns on Google Ads and Meta Ads, and how to analyze campaign results.

INFO	2024	2025
Total number of event participants	8,872	9,712
Total number of STUP events	264	318
Facilitating access to non-financial business solutions	3,825	3,859
STUP Community (number of accounts opened on the platform)	30,705	40,393

Financial education programs for the community

„FIT - Finanțe pe Înțelesul tuturor”

In a context where financial education remains a structural challenge in Romania, with over 30% of Romanians being financially illiterate and only 10% possessing basic financial skills, according to the 2023 Eurobarometer, Banca Transilvania maintained its firm commitment in 2025 to driving change through the FIT program: Finance for Everyone. Launched in 2023, FIT has gradually become more than just a project: a national financial education infrastructure, built to bring clarity where the numbers show the greatest need.

2025 was the year in which FIT consolidated its presence and impact, developing a balanced mix of digital content, offline interactions, and community engagement. The program continued to translate complex financial concepts into simple, accessible, and useful explanations: a necessary step in a country where questions such as “how do you save?”, “how does interest work?”, or “what is the difference between investing and spending?” still lack clear answers for a large portion of the population.

Following the success of the “De Toți Bani” series, 2025 brought an expansion of the FIT universe into the online space with the launch of additional content from the “Descifrat.” series. Featuring creators and guests highly relevant to young audiences - from Selly and Denisa Tănase to Ianis Hagi and Paul Olteanu - the program continued to explain financial topics in a friendly, modern, and easy-to-consume format. The results confirmed the content’s usefulness and appeal: over 500,000 views on YouTube, 15 million views on TikTok, and another 700,000 on social media.

The FIT online platform is a digital channel through which the bank provides the public with financial education resources, including articles, videos, and interactive tools. Among the available modules is the financial education quiz, which includes the FIT quiz with over 15,000 people entered in the 2025 prize draw and the online safety quiz, which has recorded over 130,000 contest entries, according to reports extracted from the internal Siebel platform. The prizes up for grabs, ranging from smart devices to festival passes, boosted participation, but the real goal was educational: testing and reinforcing financial knowledge.

2025 also marked an intensification of FIT’s presence at major festivals in Romania: an unconventional space for financial education, yet highly relevant to young audiences. FIT thus reached hundreds of thousands of people through dedicated activations at Electric Castle (274,000 attendees), Untold (427,000 attendees), and Beach Please (150,000 attendees). Interactive experiences, educational materials, and live activations transformed financial topics into natural discussions, integrated into contexts familiar to the audience.

In 2025, FIT organized over 400 financial education presentations in elementary and high schools, where over 50,000 educational kits were distributed to the same number of participants.

With over 5 million people exposed to online content, hundreds of thousands of direct interactions, and a constant presence in spaces relevant to the public, FIT has solidified its position as a robust and consistent initiative in the field of financial education in Romania. The program continues to evolve through dedicated projects, updated resources, and nationwide campaigns, providing the public with clear, accessible, and relevant information for a better understanding of personal finance.

A Different Kind of School

Through **Școala Altfel**, colleagues from BT branches are directly involved in financial education activities in schools, at the invitation of teachers. The initiative is aimed at children and young people aged 4 to 18 and aims to help them understand, from an early age, the importance of proper and responsible money management.

During these sessions, our colleagues use **FIT** - Banca Transilvania's **financial education program**, designed specifically to translate financial concepts into language accessible to all age groups. Using FIT's materials and structure, they deliver interactive presentations tailored to the students' level of understanding and guide them through hands-on learning exercises.

Participants learn:

- how to distinguish between needs and wants
- the consequences of their decisions on how they spend their allowance
- how to save, prioritize, and plan
- what a personal budget is and how to manage it effectively

Through these activities, students gain not only useful information but also a healthy perspective on their relationship with money. FIT thus becomes a tool through which BT contributes to shaping a generation that is more informed, more responsible, and better prepared for the financial challenges of everyday life.

BT Club

BT Club – The Romanian Entrepreneurs' Club. Founded by Banca Transilvania in 2006, BT Club is an exclusive platform designed for entrepreneurs interested in developing their businesses and skills through access to educational resources and networking opportunities. Members have free access to a wide range of training sessions, workshops, webinars, seminars, and conferences covering topics ranging from strategic management and employee motivation to sales, human resources, and innovative solutions for business

growth. BT Club also facilitates meetings and the formation of partnerships with other entrepreneurs who share the same ideas and values, fostering a dynamic and supportive community. The club also offers free consulting through club partners and Banca Transilvania's European Programs Department, supporting entrepreneurs in accessing and developing projects eligible for structural fund financing.

Throughout 2025, BT Club continued to strengthen its role as a partner to the business community by organizing two landmark events. **The second edition of the HR Connect Conference**, held in Cluj-Napoca on **March 20, 2025**, brought together human resources professionals in a setting dedicated to the exchange of ideas and best practices. Subsequently, on **November 13, 2025**, also in Cluj-Napoca, **the second edition of the Sales Connect Conference** took place, an event focused on current trends in sales and the development of commercial skills.

Ask BT

Ask BT is an online platform, designed as a search engine, with over 2,000 questions and answers about banking, as well as about the products and services of Banca Transilvania Group companies. Thanks to the integration of artificial intelligence, people searching for information using AI Search receive a comprehensive answer to their online questions, based on all the details available on Ask BT regarding that topic.

- Over 3.5 million people visited the site in 2025, and nearly half a million did so to chat with AI Search
- On average, visitors ask 3 questions via AI Search and stay in the conversation for about 3 minutes
- Visitor interest has shifted from year to year, so the most searched-for information is about the BT Pay and BT Go apps and about BT products and services
- Nearly 80% visit the site from a mobile phone, and 55% arrived at the site via direct access.
- Internationally, the site is visited primarily from Germany, the United Kingdom, Italy, Spain, and France. The number of visits from the Republic of Moldova has increased year over year.

Banca Transilvania is the first bank in Romania to integrate artificial intelligence into its online communication, services, and processes, using both Robotic Process Automation (RPA) and Large Language Models (LLM).

#mentoratpebune

The “Mentorat pe bune” program is an informal meeting format designed to facilitate authentic and open discussions about the realities of entrepreneurship in Romania. The event offers a sincere space for dialogue, free of clichés or filters, where participants share

real experiences, lessons learned, and practical insights relevant to business development. Structured as an interactive dialogue rather than a traditional conference, the event encourages entrepreneurs to talk about their journey, seek advice, and connect with other members of the entrepreneurial community. The small number of participants is a deliberate choice, intended to maintain an authentic setting and facilitate valuable exchanges of expertise.

The guest for the 2025 edition was Radu Savopol, co-founder of the 5 to go chain, one of the strongest Romanian brands in the coffee industry. With over 20 years of experience in entrepreneurship, he shared his journey, from humble beginnings in a space of just 13 m² to the development of the largest coffee shop network in Eastern Europe, with over 600 locations. During the meetings in Arad and Târgu Mureș, he spoke about the initial challenges, the mistakes that shaped subsequent decisions, the key moments, and the courage that underpinned the brand's expansion. The event is dedicated to entrepreneurs who want to learn, be inspired, and grow in an authentic way, #pebune.

BT Business Line

As part of its initiatives to support entrepreneurs, the BT Group launched a mini-series of short videos designed to help people understand the products and services offered to businesses. Each episode was produced in an accessible and dynamic format, featuring an influencer or comedian who is also an entrepreneur engaging in a conversation with a BT colleague about common questions and challenges when interacting with the bank. These conversations addressed "FAQ"-style topics, presented in a friendly and engaging style, with the goal of making the basics of banking easier for entrepreneurs to understand.

The series covered the most relevant topics for the business segment, ranging from checking accounts, POS systems, and the bank's digital apps to online security and checking account packages. Through this initiative, the bank provided clear, easy-to-understand explanations, thereby supporting the development of financial literacy within the entrepreneurial community.

Financial education projects and youth projects at Victoriabank

The "A Memorable Day at the Bank" Project

In 2025, Victoriabank reaffirmed its commitment to youth development, promoting financial education as an essential pillar of social sustainability. The bank's headquarters hosted over 100 children and young people, ranging from first-grade students to high school students in grades 10–12 from educational institutions in the capital. The Human Resources team designed a customized program aimed at capturing the attention and sparking the curiosity of both students and accompanying teachers.

The activities included thematic sessions dedicated to:

- The history of banking and the evolution of banknotes;
- The structure of a commercial bank;
- How ATMs and operational infrastructure work;
- Responsible money management;
- The use of digital banking.

In this way, Victoriabank contributes to the development of a new, informed, and responsible generation, encouraging the adoption of healthy financial behaviors and facilitating young people's early access to the fundamental concepts of financial education.

Victoriabank Partnership with AIESEC CHIȘINĂU

In 2025, for the third consecutive year, Victoriabank continued its partnership with AIESEC Chișinău, the largest global youth organization focused on developing leadership and entrepreneurial skills among young people. AIESEC is an international organization led by young people, students, and recent graduates of higher education institutions who are passionate about global issues, leadership, and management. This partnership reflects the shared commitment of Victoriabank and AIESEC Chișinău to support the personal and professional development of young people in Moldova and to actively contribute to the well-being of the community. In 2025, two editions of the joint project "Career Orientation: Zoom in Victoriabank" were organized. The event offered young people networking sessions and interactive workshops, training, and facilitated direct interaction with professionals from various departments within the bank: Human Resources, IT, Customer Service, Audit, Marketing, Operations, Treasury, Risk, Accounting, etc., including opportunities for internships, job shadowing, and employment. The project provided valuable hands-on experience and an authentic learning environment for young people interested in a career in banking. Additionally, the bank participated in meetings with students as a partner, where it presented the opportunities offered by Victoriabank as an employer. In addition, Victoriabank employees conducted training sessions for young people, sharing their professional experience.

Victoriabank Partnership– Diez.md

In 2025, Victoriabank continued its strategic collaboration with the diez.md platform, a portal recognized for its contribution to informing and supporting young people in the Republic of Moldova through educational initiatives and projects dedicated to career guidance. As part of this collaboration, two professionals from Victoriabank, the Deputy Director of Human Resources and an Auditor from the Internal Audit Department, participated in media projects aimed at presenting authentic perspectives on careers in the banking sector and inspiring young people on their professional paths. Through employee participation, Victoriabank was able to offer young people in Moldova real-life examples of professional development in the banking sector and to highlight an organizational culture

based on continuous learning, dedication, and performance. These authentic testimonials have helped strengthen the bank's position as an attractive, people-oriented employer committed to supporting young people.

Global Money Week

For the fourth consecutive year, Victoriabank has joined the international Global Money Week campaign, an initiative supported by the National Bank of Moldova, designed to inspire and educate children about the importance of responsible money management. This year, 34 students from Primary School No. 120 "Pas cu Pas" in Chişinău, accompanied by teachers and a group of parents, were our guests.

In a friendly and interactive atmosphere, the children explored essential concepts such as the value of money, saving, managing expenses, and smart investing. Through hands-on activities and real-life examples, they learned how banks work, what a savings account is, and why it's important to make wise financial choices from a young age.

With the help of Victoriabank specialists, the young participants analyzed various international currencies, discovered how banknotes are secured, and learned how to recognize authentic ones.

One of the highlights of the young students' visit was the demonstration at the multifunctional ATM installed at the Head Office. The children were shown how to use an ATM, what transactions they can perform, and how cards are protected against risks. In addition, the students had the opportunity to see how mobile banking apps work and how electronic payments are made - essential elements in an increasingly digital world.

3.5 Investments in the Community

The BT Group considers community investments an integral part of its role in the economy and society. By directing financial resources, expertise, and volunteer involvement, the bank contributes to the sustainable development of the communities in which it operates.

We aim for our impact to extend beyond our financial activities and generate real change in the communities we serve. We support social projects of national significance, as well as initiatives that address the specific needs of local communities through grassroots involvement.

The main areas of community engagement that guide us when selecting projects to support are:

- Supporting the Romanian economy and entrepreneurs;
- Supporting competitive sports;
- Supporting the cultural and artistic sector;
- Supporting young talent and the development of new ideas;
- Providing support and solidarity to disadvantaged communities;
- Engaging in projects related to the environment and environmental protection.

Responsibility for sponsorship policies and procedures lies with the Marketing, Communications, and PR Department. The selection of CSR projects in which we participate is based on clear criteria, such as: relevance to the community, alignment with BT's brand values and positioning, potential for long-term impact, and the ability to generate engagement and visibility consistent with the communication strategy; developing long-term partnerships with nonprofit organizations.

Eligible for sponsorship are non-profit legal entities, public institutions and authorities, as well as public figures residing in Romania who are active in the aforementioned fields. In addition, we support radio and TV programs, as well as editorial projects - books or publications - that fall within these areas of interest.

At the local level, the Bank's branches have annual budgets dedicated to sponsorship, which they manage in accordance with internal procedures, supporting initiatives that have an impact on the communities where they operate. Sponsorship thresholds and the distribution of funds to branches are established annually at the Leaders' Committee meeting.



In 2025, sponsorships provided by Group companies totaled 87 million RON.

As part of the community investment planning process, we consistently take into account feedback from the associations and NGOs we collaborate with. We conduct regular consultations and direct discussions to identify the real needs of beneficiaries, and when

new needs arise, we adapt our priorities and interventions flexibly. These ongoing dialogues through meetings, working sessions, and evaluations throughout project implementation allow us to best respond to the needs of the communities where we operate.

In 2025, two of the projects we supported were recognized with GOLD awards in the Community Index 2025, confirming their positive impact and relevance to society:

- [The “DAR Scholarships” program](#), implemented by the Hope and Homes for Children Foundation;
- [The “What’s Next” program](#), run by Save the Children.

The impact of sponsored projects is assessed both during their implementation and upon completion. In collaboration with partner NGOs, we establish clear objectives and actions at the start of the project, after which we monitor progress through regular discussions and adapt if additional needs arise. At the conclusion of each project, we request a detailed report highlighting:

- how the funds were used,
- the number and profile of beneficiaries,
- the degree to which the initially established activities were carried out,
- the project’s sustainability and the continuity of interventions.

As key evaluation indicators, we look at the number of beneficiaries, the relevance and effectiveness of the activities carried out, the transparent use of funds, and the potential to generate a lasting impact.

Regarding our colleagues’ involvement in volunteer activities, we do not have a formal internal policy dedicated to volunteering, but we actively encourage participation in initiatives that have an impact on the community. The most common projects are the annual reforestation efforts, and in 2025 we also organized a hike along the Via Transilvanica, in which over 600 BT colleagues participated, strengthening team spirit and contributing to environmental protection.

Environmental Projects

Reforestation initiatives

In 2025, reforestation efforts continued through two initiatives carried out in April in the Transylvania region.

Together We Plant a Forest, a project carried out in partnership with the Beard Brothers Association and launched in 2023, involved planting 10,000 oak and ash saplings across 3 hectares in the village of Suarăș, Bobâlna commune. Over 500 volunteers participated in the initiative.

As part of the “We Reforest EC Village” initiative, held in Bontida, 1,000 saplings were planted across 1 hectare, with the involvement of over 100 volunteers. The project was launched in 2023 and is carried out annually.

From 2014 to the present, the Bank has invested over 600,000 euros in volunteer reforestation programs carried out in the counties of Cluj, Bistrița-Năsăud, Călărași, and in Bucharest. By the end of 2025, over 14,000 volunteers had actively participated in these initiatives, planting over 340,000 saplings across nearly 90 hectares of land, which have since grown into forests.

Through these efforts, the Bank makes a tangible contribution to protecting the environment and conveys a powerful message of responsibility, engagement, and care for nature to younger generations.

Via Transilvanica - Tășuleasa Social

The partnership between Banca Transilvania and the Tășuleasa Social Association has a history spanning over a decade and is based on shared values such as environmental stewardship, local community development, and civic engagement. The collaboration began with volunteer programs for reforestation through the Transylvania Forest initiative, in which thousands of BT volunteers have contributed, over the years, to planting hundreds of thousands of saplings in several counties across the country.

Starting in 2023, the partnership was expanded to a strategic level through support for the Via Transilvanica project, the road that unites, Romania’s first long-distance trail, which crosses the country over a distance of approximately 1,600 kilometers. Since then, we have supported the project through financial contributions, volunteer activities, as well as through promotion and the active involvement of our employees. The Bank’s involvement contributes to the preservation of Romania’s natural and cultural heritage, the revitalization of rural areas, and the strengthening of a sense of belonging and unity among the communities along the route.

The project enjoys high visibility among the public and managed to attract over 140,000 hikers last year, with Via Transilvanica becoming an international landmark.

Cultural Events

BT x MARE

The Museum of Recent Art (MARE) houses a representative collection, bringing together over 1,300 works by national and international artists, with a particular focus on art created from the 1960s to the present. The collection focuses on local art from the past 50 years, reflecting the evolution and diversity of Romania’s contemporary art scene.

The museum space covers approximately 1,200 square meters, spread across five levels of a building with spectacular architecture, and displays over 150 works to the public, in accordance with museographic standards.

MARe is a cultural project playing an active role in the development and consolidation of Romania's contemporary art scene, contributing to increased visibility for artists and the promotion of their works.

Throughout 2025, the museum hosted two landmark exhibitions for the cultural industry, "All Our Todays" and "Does Anyone Want to Be Me?", which attracted a significant number of visitors, both through traditional visits and guided tours, as well as through creative workshops and private events.

In 2025, Banca Transilvania entered into a partnership with MARe to organize events for BT colleagues and clients, encouraging openness and interest in contemporary art. Through these initiatives, the museum attracted approximately 20,000 visitors.

Through this partnership, Banca Transilvania aims to support the growth and development of contemporary art in Romania by facilitating the general public's access to relevant exhibitions and works, as well as to workshops and meetings with renowned artists and curators, dedicated to BT's clients, colleagues, and partners.

RAD 2025 (22 – 25 mai)

Compared to the first edition of RAD Art Fair, the artistic quality of the contemporary art fair has increased significantly year after year, as has the number of activities integrated into the event days.

In 2025, the fair featured 28 galleries (including spaces in Bucharest, Cluj, and Timișoara, as well as galleries in Chișinău, Warsaw, Vienna, and Berlin, all active at the highest level of the international contemporary art scene, including Art Basel), featuring works by over 100 artists, 31 curators from 17 countries, over 1,500 VIP guests and 8,500 visitors, 100 works in the sculpture park, 17 collateral events organized by museums/collectors and galleries, plus 6 awards presented to the best works. Also launched were: RAD Cinema and Platform, for emerging galleries, with a mentoring program included.

Mina.Cluj – immersive art museum

Since its opening, MINA.Cluj has launched 12 immersive shows, plus ancillary events (film screenings or themed cinemas), which have attracted approximately 220,000 visitors to the museum over the course of a year. An industry record, with even more visitors than the immersive space in Bucharest. Our partnership with MINA.Cluj was heavily promoted through both permanent branding materials and online or via BT's communication channels (newsletters, ATM videos, window decals at BT agencies, OOH spaces). Additionally, a key pillar of our collaboration with them was the benefits section in BTPay for customers, as

well as special promotions designed for colleagues. We offered discounts for payments made with any BT card, guided museum tours for colleagues, and more.

TIFF

The Transylvania International Film Festival (TIFF) continues to be one of the most significant cultural events in Romania, contributing to cultural life and providing the general public with access to international and local cinema. The 2025 edition, the 24th, brought together approximately 125,000 participants in Cluj-Napoca over 10 days of screenings and events.

The festival program included hundreds of screenings, events dedicated to the film industry, exhibitions, and cultural activities. A large portion of the films screened, over 100 screenings, were sold out, reflecting the public's growing interest in the cinematic diversity promoted by TIFF.

Banca Transilvania has been the festival's main partner since 2018 and consistently contributes to its development and the expansion of its impact across the country. BT's support covers not only the main edition in Cluj, but also extensions such as TIFF Sibiu, TIFF Timișoara, TIFF Oradea, the TIFF Unlimited Caravan, the White Night of Romanian Film, the Sunscreen Festival, Luna Plină, Alba Iulia Music & Film, and the Gopo Awards Gala. This long-term partnership supports cultural diversity, initiatives dedicated to film education, and the strengthening of creative communities in Romania.

Additionally, throughout 2025, Banca Transilvania has served as a partner at major festivals, offering creative activations, digital solutions, and financial education components, thereby strengthening its connection with young audiences and new generations.

The Art Encounters Foundation, based in Timișoara, is one of the most important platforms for contemporary art in Romania and Central and Eastern Europe. In addition to its permanent exhibition program, it organizes the Art Encounters Biennial and programs focused on education, cultural mediation, and artist residencies.

The permanent exhibition program in 2025 featured the most comprehensive retrospective of artist Ștefan Bertalan: "In the Rhythm of the World," Anca Benera & Arnold Estefán: The Unfolding of the World, and many exhibitions dedicated to emerging artists.

In 2025, Art Encounters attracted approximately 25,000 visitors through both its permanent art program and the Art Biennial. Over 150 related events were organized: guided tours, children's workshops, performances, debates, and book launches.

Faber Timișoara is one of the most important independent cultural centers in western Romania, a leading venue for contemporary art, design, and the creative industries, attracting thousands of visitors annually through exhibitions, concerts, and cultural events, and playing a central role in the 2025 Art Encounters Biennial.

Unfinished Festival

Unfinished is one of the most important interdisciplinary events in the region, a space where the dialogue between technology, art, and social reflection opens new perspectives on the world we live in. The 2025 edition marks the third year of our partnership and continues to strengthen a community united by curiosity, ideas, and memorable experiences. For us, participating in Unfinished represents not only support for a valuable cultural project, but also a strategic opportunity to stand alongside the people and initiatives that influence the directions of tomorrow's society.

In 2025, the event attracted 3,141 participants, solidifying its role as a relevant space for exploration and conversations about the future. The audience for this edition reflects the modern profile of the Unfinished community: 68.95% women, 29.9% men, with the majority in the 25–40 age group (65%).

At the same time, throughout 2025, Banca Transilvania served as a partner at major festivals, featuring creative activation, digital solutions, and financial education components, thereby strengthening its connection with young audiences and new generations.

Beach, Please! 2025

The 2025 edition of the Beach, Please! festival took place July 9–13 in Costinești, bringing together international artists and a large audience, with over 155,000 attendees on the day with the highest turnout. Considered one of the largest urban music festivals in Europe, the event featured BT in the participant zone, offering payment solutions, relaxation areas, interactive activations, and a basketball court set up for the public.

Electric Castle 2025

At the 11th edition of the Electric Castle festival, which brought together approximately 289,000 attendees, BT was present through the BT World concept, significantly expanded in 2025. The space included a relaxation area and an interactive installation set in the nearby forest, becoming a landmark for attendees.

Activities included the interactive FIT | BT quiz with prizes and a seating area, the Kids Area dedicated to participants' children, featuring educational and interactive activities organized in partnership with NGOs, as well as Chill by the Hill, a relaxation area situated at the highest point of the festival.

Untold 2025

At the UNTOLD X anniversary edition, which brought together over 470,000 attendees, BT was present with several spaces dedicated to the public. BT World incorporated a thematic design and a financial education component through the FIT | BT activation, which included an interactive quiz with prizes. The main festival area also featured the BT VIP Lounge, a

platform located near the main stage, dedicated to holders of BT x UNTOLD x VISA cards. Additionally, the festival introduced the Kids Area, a new activation space with themed decor and BT Pay Kiddo materials.

Nostalgia 2025

(4 editions in March, June, August, and November + two anniversary editions)

In 2025, Nostalgia featured four editions held in March, June, August, and November, along with two anniversary editions. BT maintained a consistent presence at the event through themed brand activations such as BT Disco World and BT Dream Vault, payment solutions, and the FIT | BT component, which included a financial education quiz with prizes.

The 2025 presence covered three editions held in Bucharest, with approximately 170,000 participants in total, one edition in Constanța, Mamaia, with 45,000 participants, as well as two national editions in Craiova and Oradea, which brought together approximately 13,000 participants.

Sport

Transylvania Open

The 2025 edition of the Transylvania Open solidified the tournament's position on the WTA 250 circuit, continuing to attract international interest and keeping Cluj-Napoca on the world tennis map.

The main draw also featured acclaimed Romanian players such as Ana Bogdan, Gabriela Ruse, and Simona Halep, who made history by announcing her retirement at the end of the tournament. The competition was won by Anastasia Potapova, who defeated Lucia Bronzetti in the final.

Banca Transilvania continued its partnership with the Transylvania Open in 2025, supporting the tournament's development and visibility on the circuit. The continuation of this partnership reflects BT's commitment to promoting competitive sports and supporting major international events organized in Romania.

U-Banca Transilvania Sports Club

The partnership between Banca Transilvania and U-BT Sports Club began in 2015 and has expanded over time to include collaboration with the Romanian Basketball Federation and support for the national team. U-BT is one of the most professionally organized structures in Romanian basketball, active at all levels: junior teams, an academy, and a senior team. In 2025, U-BT had a strong season, once again emerging as the Romanian champion, drawing a record crowd at BT Arena, and reaching the quarterfinals of the BKT EuroCup. The greatest achievement of the 2024–2025 season was joining the ABA League, a competition that brings together the most important teams in former Yugoslav basketball, with a

tradition spanning over two decades. Banca Transilvania maintains a close connection with this club, in the spirit of promoting performance and supporting team sports.

Sports Festival

Sports Festival, now in its sixth edition in 2025, once again brought to Cluj-Napoca the most comprehensive experience dedicated to mass sports and the community. The event took place between June 12 and 15, 2025, in the traditional areas around Cluj Arena, Central Park, and Iuliu Hațieganu Park. The program featured over 100 events and introductory sessions in more than 25 sports, offering experiences for all ages and skill levels.

One of the highlights of the edition was the “Ronaldinho & Friends” exhibition match, a unique show that brought Ronaldinho, Adriano, Robert Pirès, Marco Materazzi, Wesley Sneijder, and other major names in world soccer onto the field, alongside Team Romania, made up of former great Romanian players such as Adrian Mutu, Mirel Rădoi, and Răzvan Raț. The exhibition match took place at the BT Arena and was one of the most anticipated highlights of the festival.

Banca Transilvania continued to support the festival, reinforcing its role in promoting an active and healthy lifestyle.

Romanian Football Federation

Banca Transilvania initiated its partnership with the Romanian Football Federation in 2021, becoming the federation’s official bank and the main partner of the youth and junior teams. Starting in 2023, the partnership expanded to include the senior national team, and by the end of 2024, BT had also become the sponsor of the Women’s National Soccer Team. In 2025, BT supported the national team on its journey to the World Cup, and in June, the organization of the Under-19 Final Tournament - UEFA EURO 2025.

Romanian Basketball Federation

As early as 2017, we began a strategic partnership to develop Romanian basketball at the national level by supporting the Romanian Basketball Federation and the men’s teams. Toward the end of 2025, we also became supporters of the women’s teams within the federation and served as main sponsors for the organization of the National Women’s Basketball League and the Women’s Basketball League 1. Also in 2025, we supported the organization of mini-basketball and baby-basketball tournaments, thereby achieving a 360-degree integration into Romanian basketball.

Gheorghe Hagi Sports Club Academy

The Gheorghe Hagi Sports Club Academy is the largest soccer project in Romania, aimed at training, preparing, and developing children and youth for performance at the national and international levels. Currently, the academy hosts approximately 250 athletes, organized into 13 age groups, ranging from 6 to 19 years old. In its first ten years of

operation, it has won 24 national junior titles and has consistently contributed to the national teams, with an average of over 40 players per season. Banca Transilvania supports this project in line with its commitment to athletic performance and the development of younger generations.

In addition to the projects outlined above, Banca Transilvania has expanded its involvement in sports through long-term partnerships and strategic initiatives with organizations and clubs that contribute to the development of Romanian sports, supporting both elite and recreational sports. In this context, the bank has been providing ongoing support to the Romanian Olympic and Sports Committee since 2022 to assist athletes representing Romania in international competitions, including the 2026 Winter Olympics and the 2028 Summer Olympics; it maintains a long-term partnership with FC Universitatea Cluj, a club that is emblematic for the local community; and supports the Napoca Rally Academy, contributing to athletic performance and the promotion of road safety education. At the same time, the bank supports mass sports projects, such as the Apuseni Marathon, the Via Transilvanica Marathon, and the Timișoara 21K.

Social Projects

The Blondie Association provides medical air transport for seriously ill children who cannot be treated in the country and urgently need access to hospitals abroad.

Banca Transilvania is the strategic partner of the Blondie Association, supporting medical air transport for seriously ill children through direct sponsorships, national campaigns, and facilitating donations via BT Pay. The partnership directly contributes to saving lives and ensuring equitable access to emergency medical treatment.

The Little People Association provides psychosocial support to children and adolescents diagnosed with cancer, as well as to young survivors of the disease, maintaining a daily presence in pediatric oncology wards across Romania and the Republic of Moldova. The organization provides specialized psychological interventions and coordinates the Temerarii Community, a network dedicated to young people who have overcome the disease.

Banca Transilvania has been collaborating with the association since its early months of operation, providing constant support through direct sponsorships, donation campaigns via BT Pay, and dedicated POS terminals. One of the fully supported projects is “Sunt OK!”, Romania’s first teletherapy and platform for children and young people affected by cancer, through which 700 free therapy sessions have been provided to date for young people and their families.

SOS Children’s Villages’ mission is to provide a family environment for children without parental support and to prevent the separation of children from their biological families. The organization provides family-based alternative care, supports vulnerable families to

prevent abandonment, and develops services in the areas of education, health, and social integration.

Banca Transilvania supports the organization annually through direct financial aid, national donation campaigns, education and social inclusion projects, as well as targeted interventions in vulnerable communities. A strategic project is the Caravan of Good Deeds, which aims to address specific local needs by improving living conditions, facilitating access to medical services, setting up educational and play spaces, organizing camps and non-formal education activities, as well as developing resource centers for children and youth, such as the one in Avrig, funded by BT.

The Casa Bună Association has been working for over 15 years with children and adolescents from extremely vulnerable backgrounds, particularly in Ferentari and Jilava, as well as in the towns of Nucșoara and Lerești, Argeș County. Banca Transilvania is an active and consistent partner of the organization, with support including both direct funding and the involvement of the BT community.

The collaboration in 2025 included an internal campaign through which winter jackets and boots were collected and donated for 600 children, as well as the distribution of mărțișoare made by Casa Bună at BT branches in Cluj and Bucharest, thereby contributing to the support of the educational and social activities carried out by the association.

Peditel – BT is the strategic partner of PEDITEL, the only free 24/7 pediatric assistance service in Romania. Through this partnership, we support its operations via direct donations, donation-matching campaigns, and integration into the BT Pay ecosystem. The partnership contributes to equitable access to medical services for children and helps reduce the strain on the public healthcare system.

Hope and Homes for Children is one of the organizations active in the field of child protection, with a mission to close orphanage-style centers and offer every child the chance to grow up in a family environment.

Banca Transilvania has a long-standing partnership with the organization, through annual sponsorships, strategic education and inclusion projects, the integration of the foundation into BT Pay, and the direct involvement of BT colleagues in activities such as financial education sessions and workshops. One of the projects supported annually, starting in 2023, is the DAR Scholarships program, which supports vulnerable children and young people with outstanding achievements in education, sports, and the arts. In the 2025–2026 edition, 35 scholarship recipients - high school and college students - were selected, each receiving a scholarship of 2,000 euros, as well as access to personal development activities, including mentoring, camps, and workshops.

Save the Children is one of the oldest and most respected organizations in Romania dedicated to supporting children, with initiatives in areas such as health - through the

reduction of infant mortality - education, social protection, and the promotion of children's rights.

Banca Transilvania has a multi-year partnership with the organization, which began in 2020, and includes recurring sponsorships, strategic projects in the fields of health and education, as well as national campaigns.

Among the supported initiatives is the What's Next project, a pilot program for vocational guidance and career counseling aimed at students, parents, and teachers, which also includes an interactive digital platform with self-awareness resources and tools for making informed decisions regarding educational and professional paths. The bank also supports the "We Support the Toughest Starts" project, carried out in partnership with Mastercard, a three-year strategic program aimed at reducing infant mortality by equipping maternity wards, training medical staff, and providing postnatal monitoring for at-risk newborns.

3.6 Cybersecurity and Personal Data Protection

External Context

Digital transformation in the financial sector is accelerating the need for a European regulatory framework that ensures a high level of security and resilience.

In this context, Regulation (EU) 2022/2554 on digital operational resilience, known as DORA and applicable as of January 17, 2025, becomes an important benchmark for all financial institutions. DORA functions as a “lex specialis” in the field of cybersecurity and incorporates requirements that were previously set out separately in various directives and regulations, including the NIS 2 Directive (Network and Information Security Directive 2, which aims to strengthen the overall level of cybersecurity in the EU).

The regulation is built on five pillars that define how the sector must manage digital risks: ICT risk governance, incident reporting, operational resilience testing, supplier risk management, and information sharing.

At the same time, the financial sector is influenced by the accelerating pace of the market. The emergence of digital-native players, with fast, intuitive, and strongly customer-experience-oriented solutions, is changing consumer expectations and raising standards regarding the availability, security, and performance of digital services. These developments are influencing not only the regulatory framework but also the way financial institutions are rethinking their operational models, technological infrastructure, and development strategy.

Thus, to actively adapt to the new digital reality, BT Group prioritizes technological transformation and compliance with European regulations. These strategic priorities are reflected in concrete projects and clear courses of action. One example is Salt Bank, Romania's first fully digital bank, an initiative that demonstrates the Group's commitment to innovation.

Internal Regulatory Framework

A significant part of the Group's activity depends on the secure and efficient management of large volumes of confidential information and sensitive data, as well as the processing of a high number of complex transactions. The Group manages extensive data on its customers, both individuals and legal entities, and is responsible for accurately reflecting all operations related to their accounts. Thus, the secure and uninterrupted operation of the entire IT infrastructure and communications networks is vital for business continuity.

At the same time, activities conducted with third parties, although governed by strict contractual agreements, may also generate cyber and technological risks. The Group operates a strictly controlled IT environment and limits external vendors' access to its systems. However, situations involving unauthorized access, data loss or destruction, or

other incidents that could affect operations may arise. Such risks, if they persist, could impact the Group's business, strategy, and financial performance.

In this context, cybersecurity is a critical area for protecting BT's business, employees, and customers. The Bank has developed a robust framework of information security standards, applicable at the Group level, which includes a set of 29 policies defining the organizational and technical requirements necessary to protect data and maintain a high level of information security. These include the Information Security Policy, the Security Operations Center Operating Procedure, the Security Incident Management Policy, and the Security Incident Response Procedure. These documents are supplemented by an extensive set of internal policies and standards, such as the General Policy on Payment Service Security, the Standard on IT Security Regulations, the Information Access Control Policy, the User Access Management Policy, the User Responsibilities Policy, and the Information Classification Procedure. Together, they rigorously define the scope, objectives, guiding principles, roles, and responsibilities of all parties involved, while ensuring compliance with external requirements and applicable regulations regarding information security.

By implementing these measures, the Bank aims to effectively manage the risks associated with cyber threats and prevent any incident that could compromise confidentiality, integrity, or availability of data. At the same time, these measures help protect the institution's reputation and ensure operational continuity, strengthening the trust of customers and partners in the services offered by BT.

Responsibilities for information security are assigned to a dedicated department reporting to the CRO (Chief Risk Officer). The ICT & IT Security Risk Management Department is part of the organization's second line of defense and is responsible for managing and overseeing ICT and cybersecurity risks, as well as implementing a control system to ensure the operational performance and security of ICT systems. This system includes appropriate controls for identifying, measuring, assessing, managing, monitoring, and reporting ICT security risks.

The department is led by a Department Head and oversees the following units: the Information Security Governance Service, the Cybersecurity Service, the Application Security Service, and the IT Security Risk Oversight Service.

Objectives:

- Defining the information security management framework, based on the principles defined in information security standards and industry best practices;
- Providing specialized support to the subsidiaries of BT Group to assist them in developing their own information security policies;
- Identifying, monitoring, and defining measures to mitigate information security risks;
- Defining the information security strategy and measures for its implementation within the organization;

- Providing the necessary support regarding procurements specific to information security solutions.

Activities, duties, and responsibilities of the ICT & Sec IT Risk Management Department:

- Ensures and monitors compliance with the Bank's internal policies and regulations;
- Provides support in the technical development and review of the risk management framework, in accordance with standards and best practices (such as, but not limited to, ISO 27001, ISO 27002);
- Develops and monitors the implementation of security risk logic for security solutions under the responsibility of the first line of defense, and develops, implements, and monitors risk logic for solutions managed by the department;
- Tests, monitors, and evaluates the implementation of risk management rules in security solutions managed by the first and second lines of defense;
- Establishes and configures verification, detection, and alerting mechanisms within the security solutions managed by the department, ensuring configuration compliance and proper maintenance;
- Provides support for reporting key risk indicators (KRIs) and creating dashboards for monitoring ICT & IT Security risks;
- Develops control logic based on evaluated alerts and reported incidents, including for the technical and administrative configurations of the security solutions managed by the department;
- Provides support in documenting and investigating critical information security incidents, maintaining a record of incident management activities and requesting additional information from the teams involved;
- Monitors violations of information security policies or external regulations and proposes corrective measures, in collaboration with the relevant organizational units, including for assessing the effectiveness of controls, identifying vulnerabilities, and formulating risk mitigation strategies;
- Provides specialized expertise in the field of information security to ensure that the Bank's new projects and current activities comply with regulations and best practices in the field;
- Coordinates the technical evaluation of security solutions managed by the department;
- Manages projects within the department through a dedicated project manager (PM), assigned in accordance with applicable Internal Rules of Procedure and procedures;
- For all of the above activities, teams within the department must have full access to the verified systems, information, and processes.

In line with the Group-wide internal cybersecurity regulatory framework, Banca Transilvania is ISO 27001 certified for its electronic archiving and software development processes. This framework forms the foundation of a rigorous information security system, combining technical processes, internal policies, and operational procedures into a coherent cybersecurity risk management system.

By implementing ISO 27001, the Bank pursues three key objectives:

- protecting customer data and preventing information leaks;
- developing effective mechanisms for detecting and preventing cyberattacks;
- continuously monitoring and improving all processes related to IT security.

Cybersecurity Incidents and Measures to Manage Them

The Bank faces multiple Distributed Denial of Service (DDoS) attacks annually, but their impact is minimized thanks to the effectiveness of the technical and non-technical controls implemented to limit the effects and maintain operational continuity.

This level of protection is supported by a set of well-defined preventive and response measures:

- the use of anti-DDoS solutions provided by a global partner with expertise.
- contracting managed monitoring and specialized mitigation services that provide infrastructure-level protection.

These are complemented by the internal response capability of a Security Operations Center team, responsible for 24/7 incident monitoring and management, intervening rapidly through investigations and remediation measures, ensuring an appropriate response and resolution time.

To assess security incidents, the Bank classifies the impact level based on the effects on operations and customers. The impact is determined based on criteria such as the number of affected users, the duration of the incident, and the geographic distribution of the affected area.

Based on these elements, the impact can be classified into one of the following categories:

- Low impact: the incident has a limited effect on delivery service, without significant disruption and without relevant consequences for a large number of users.
- Medium impact: the incident causes a disruptive effect on service delivery, affecting a moderate number of users or a limited geographic area for a specific period of time.
- High impact: The incident has a significant disruptive effect on service delivery, affecting a large number of users, a wide geographic area, or causing prolonged service interruptions.

As part of cyber security risk management, the Bank considers the potential occurrence of DDoS attacks with varying levels of impact. Such events are addressed through dedicated root cause analysis processes and remediation of identified vulnerabilities, in line with internal post incident analysis procedures. As a result of these analyses, DDoS mitigation policies are periodically reviewed and updated, and monitoring and response mechanisms for protection systems are strengthened, with the aim of reducing the potential impact on operations.

Key Risk Indicators

Key Risk Indicators (KRIs) are a set of metrics used for continuous monitoring of exposure to risks generated by cyber threats, technological vulnerabilities, or IT&C system malfunctions.

These indicators serve as early warnings and enable the identification of trends or signals that may indicate a deterioration in cybersecurity, before they lead to major incidents with operational, financial, or reputational impact.

The indicators are used for periodic monitoring and contextual analysis, but they do not automatically trigger corrective measures, rather, they require further evaluation by the risk function or the responsible units.

These may include indicators mandated by regulations or international best practices in the field of information security.

Key risk indicators contribute to:

- early identification of increased exposure to cyberattacks;
- monitoring the vulnerability level of the IT infrastructure;
- assessing the effectiveness of implemented controls;
- supporting the decision-making process regarding the need for additional protective measures.

Examples of KRIs used to monitor cybersecurity risks

Indicator	Definition	2025
Number of critical cybersecurity incidents identified	The number of critical cybersecurity incidents identified in the bank's IT systems that affected or could have affected the confidentiality, integrity, or availability of information during the reporting period.	4
Number of confirmed connections	Number of confirmed connections to Command & Control servers.	0
Confirmed ransomware incidents	Confirmed ransomware incidents.	0
Number of Malicious IPs/Domains Blocked by SOC	Number of malicious IPs or domains blocked following internal analyses by the BT SOC.	0
Number of confirmed RCE alerts	Number of confirmed alerts regarding Remote Command Execution incidents.	0
Number of confirmed Lateral Movement alerts	Number of confirmed alerts regarding Lateral Movement activities.	0
Percentage of systems evaluated for vulnerability and security testing	The proportion of systems subjected to IT security testing activities during the reporting period, including vulnerability testing, penetration testing, and other relevant security assessment activities.	100%

Communication with customers

In addition to the framework of policies, procedures, and responsibilities defined in the area of cybersecurity, as well as the indicators used to monitor and assess digital risks, the Group pays constant attention to how technology is integrated into customer relationships and internal processes. Security is not treated exclusively from the perspective of infrastructure protection, but also as an integral part of how digital interactions, operational workflows, and fraud prevention mechanisms are designed.

In this context, communication with customers and the use of artificial intelligence-based solutions represent an important component of the digitalization strategy, contributing both to operational efficiency and to increased levels of control and transparency.

Starting in 2023, BT has been using artificial intelligence solutions developed in collaboration with Microsoft and integrated into the Întreb BT platform. The platform provides quick access to over 2,000 questions and answers about banking products and

services via the Microsoft Azure OpenAI Service. The bank also uses AI assistants to support and streamline the work of business analysts.

Modernizing customer communication channels and integrating AI-based solutions not only contribute to faster and more efficient interactions but also support the bank's internal processes. These technologies create a more secure and better-controlled operational ecosystem, where information is managed consistently, and analysis and decision-making activities are based on structured and verifiable data. Thus, the digitization of communication naturally complements the automation of internal workflows, including in the loan approval process, where traceability and control at every stage are essential.

The credit approval process follows a well-defined workflow based on the customer category, implemented directly through the Bank's IT systems. These automated mechanisms ensure traceability and create conditions for controlling each stage, reducing the risk of errors or abuse. Thus, the risks of fraud by the person conducting the analysis are significantly limited, as controls are built directly into the IT workflow, ensuring the separation of duties and the traceability of decisions.

Initiatives for Digital Education & Online Fraud Prevention

As a result of lessons learned from managed incidents, the Bank has implemented additional measures to increase security, including defining and applying a security baseline for all systems, resetting compromised credentials, and adopting stricter standards regarding password complexity and management. These measures reduce the risk of similar situations recurring and contribute to increasing cyber resilience.

At the same time, to support training efforts and foster a corporate culture focused on digital security, the bank supplements formal training programs with dedicated awareness initiatives designed to help employees quickly identify risks and respond appropriately in potentially vulnerable situations.

In the first half of 2025, the Bank stepped up its efforts to raise awareness of cyber risks by launching a comprehensive digital education campaign aimed at customers and the public. The communication was distributed across all internal and external channels used by the Bank: social media, dedicated newsletters, website articles, as well as partner publications, with the primary objective of increasing vigilance against online fraud attempts.

A new element introduced into the prevention strategy was the online security quiz, designed for both employees and customers, based on all known types of phishing attacks. The tool was structured as multiple-choice questions with two options, only one of which was correct. To ensure that the educational messages are understood correctly, each answer was accompanied by an explanatory pop-up detailing the scenario, warning signs, and recommended actions in similar situations. With questions inspired by real-life

scenarios, clear explanations, and an interactive learning mechanism, the quiz was completed by over 200,000 people in just the first few months.

From mid-2025 to the present, the Bank's efforts to inform and prevent online fraud have continued consistently across all our communication platforms. The messages have been updated based on newly identified attack patterns, helping to strengthen the culture of digital security among BT customers.

These internal and external communication initiatives were complemented by campaigns such as "Stai un pic înainte de klik – De ce sa pierzi banii câștigați cu greu?" which reinforces cyber vigilance and transforms prevention into both an individual and collective responsibility.

„Stai un pic înainte de click - De ce să pierzi ușor banii câștigați cu greu?”

Banca Transilvania's initiative dedicated to online safety began in July 2023, at a time when digital fraud attempts were becoming increasingly sophisticated. Under the name "Stai un pic înainte de click (Stop for a moment before you click)," the project started with a simple yet essential idea: to give people the tools they need to critically evaluate online information and distinguish between legitimate and fraudulent content. The first messages quickly gained traction, and in just a few months, the campaign became a benchmark in digital education, supported by social media, dedicated articles, and direct communications to customers.

In 2024, the project continued by expanding its outreach through a series of materials created in collaboration with content creators and public figures, making the topic of online safety accessible to a broad audience. The theme was also integrated into the financial education project FIT: Finance for Everyone, where a special episode was dedicated exclusively to online safety.

In 2025, the Bank introduced a new creative approach under the message "De ce să pierzi ușor banii câștigați cu greu?", which repositioned the communication in a more personal and individual responsibility-oriented direction, emphasizing the importance of protecting one's own income. The campaign had one of the highest levels of impact in the project's history, reaching millions of users and generating a level of engagement that exceeded estimates.

Today, "Stai un pic înainte sa dai un klik" is one of BT's most visible and consistent consumer protection programs. From the first visuals in 2023 to the complex campaigns of 2025–2026, the project has evolved into a comprehensive and continuous, e effort focused on education, transparency, and responsibility, key elements in the sustainability of modern financial services.

Impact Metrics

- 280,000 people have taken BT's online safety quizzes.
- 200,000+ participants in the first 4 months of the year alone; 60 winners in the initial campaign.
- 45,000+ reactions in Q1 2025 vs. 70,000+ reactions to BT posts on online safety (June–Oct 2025).
- 500,000+ customers informed via newsletters dedicated to fraud.
- 400,000+ customers/month reached through summary newsletters.
- 135,000+ views in the 9-episode YouTube series featuring educational content.
- 10+ national media outlets amplified BT's messages on fraud prevention.
- ~2 million views of social media posts between June and October.
- 1.5 million+ estimated views for the final edition of the "Think Before You Click" campaign.
- 40 million views generated through TikTok content (8 videos).

Cybersecurity Training

In 2025, the Bank continues to strengthen its cybersecurity culture by organizing regular training sessions for employees. These programs also include training on cyber vigilance, phishing, and incident management, continuing the training trajectory previously demonstrated by the over 34,471 hours of information security training completed by employees across the Group.

Personal Data Protection

To ensure a unified approach to information security, technical and operational cybersecurity measures are complemented by a **robust data protection compliance framework**, as any IT incident has direct implications for the obligations set forth in the General Data Protection Regulation (EU) 2016/679. The financial services sector has become increasingly digitized, automated, and dependent on the internet, which has amplified the Group's exposure to risks of unauthorized or accidental data disclosure through cyberattacks or IT system failures. Issues such as system errors, computer viruses, data misuse - whether intentional or accidental - hacker attacks, or unauthorized access to the bank's infrastructure can affect the institution's ability to protect customer data in accordance with legal requirements.

Such situations may compromise the confidentiality of information and lead to disruption of the services provided. In certain cases, they may also result in significant penalties or other legal and reputational consequences.

To ensure strict compliance with GDPR regulations, the entities of the BT Group have adopted a set of policies, procedures, and internal measures, structured around key areas:

- **General Rules on the Processing and Protection of Personal Data** – These rules establish the general framework for the lawful, fair, and transparent processing of personal data across all BT Group entities, ensuring respect for the rights of data subjects and the implementation of appropriate security measures.
- **Procedures for managing personal data breaches** – These procedures define the steps necessary to identify, report, remedy, and, where applicable, notify in accordance with legal provisions, security breaches that result, accidentally or unlawfully, in the destruction, loss, alteration, or unauthorized disclosure of processed personal data or unauthorized access thereto.
- **Procedures for ongoing employee training** – All employees of BT Group entities participate in regular training programs on the protection and processing of personal data. These sessions ensure that employees' knowledge of GDPR requirements, best practices, and individual responsibilities in managing personal data is continuously updated, to ensure compliance with legal requirements in day-to-day operations.
- **Strict data privacy rules** – Group employees are required to respect the confidentiality of personal data, including financial data protected by banking secrecy. These rules impose clear restrictions on access to and use of such data to prevent unjustified use and unauthorized disclosure.
- **Regulations regarding the rights of data subjects** – Individuals whose data is processed by BT or other entities within the BT Group enjoy all the rights provided by the GDPR, including the right of access, rectification, erasure, restriction of processing, objection, data portability, the right not to be subject to decisions based solely on automated processing, as well as the right to withdraw consent when it constitutes the basis for processing. Internal procedures establish how these requests are handled, ensuring they are resolved within the legal timeframes. In accordance with the principle of transparency, the Bank and BT Group entities provide data subjects with clear information notices regarding the purposes and legal bases of processing, the recipients of the data, the retention period, the contact details of the data protection officer, and the rights guaranteed.
- **Rules regarding data processing in direct marketing activities** – Any activity involving the processing of personal data for advertising purposes (direct marketing) carried out by BT or the group entities complies with GDPR rules, is conducted based on strict processes, grounded in the freely given consent of data subjects for data processing, with clear options provided for withdrawing this consent.
- **Procedures for managing the processing and protection of personal data in relation to contractual partners** – BT Group entities have implemented clear rules defining responsibilities regarding the protection of personal data in their

collaborations with contractual partners. When processing personal data on behalf of and under the instructions of BT Group entities, partners have strict contractual obligations regarding the purpose and scope of processing, data security, and support provided to the controller. In situations where partners determine the means and purposes of processing jointly with BT Group entities, the responsibilities of each party are clearly defined to ensure a uniform and high level of protection for data subjects.

Each entity of the BT Group has developed a public policy regarding the processing and protection of personal data (privacy policy), available to the public via the website of each entity within the BT Group. Through this privacy policy, each entity informs data subjects about matters related to the processing of their personal data, in accordance with the provisions of Articles 13–14 of the General Data Protection Regulation (GDPR).

Regulations on the record-keeping of personal data processing activities

BT and the Group entities maintain detailed records of personal data processing activities to ensure compliance with the reporting obligations imposed by the GDPR. By implementing this regulatory framework, the Group reaffirms its commitment to complying with the requirements of the Regulation, both regarding the lawful processing of personal data and ensuring a high level of personal data security.

Responsibility for the protection of personal data

At the Group level, dedicated individuals have been appointed to serve as Data Protection Officers (DPOs), ensuring compliance with specific regulations and the protection of data subjects' rights. To facilitate transparency and accessibility, the DPO's contact details are publicly available, allowing consumers and users to effectively exercise their rights regarding the processing of personal data.

The Data Protection Officer designated for Banca Transilvania can be contacted at the dedicated email address dpo@btrl.ro, publicly available on the Bank's website within the BT Privacy Policy. The complaint channels made available to customers for each subsidiary, including complaints regarding personal data breaches, are detailed in Section 3.2. Customers and users of BT Group products and services.

Complaints received through reporting channels

In 2025, Banca Transilvania received a total of 11,781 requests regarding the processing and protection of personal data, of which 3,933 were resolved in favor of the data subjects.

The breakdown of GDPR requests received by Banca Transilvania between 2022 and 2025 that were resolved in favor of customers/data subjects is provided below.

	2025	2024	2023	2022
Total number of requests/complaints regarding the processing and protection of personal data (GDPR requests) that were resolved in favor of the client/data subject*	3,933	4,539	3,248	3,116
GDPR requests received through the Center for Alternative Dispute Resolution in Banking (CSALB)	214 of which 166 were resolved in favor of the customer	132 of which 64 were resolved in favor of the customer	136 of which 72 were resolved in favor of the customer	75 of which 66 were resolved in favor of the customer
GDPR requests received through ANPC	29, of which 9 were resolved in favor of the client	15, of which 7 were resolved in favor of the customer	15 (of which 6 were resolved in favor of the client)	10 (of which 9 were resolved in favor of the customer)
GDPR requests received through the NBR	3, of which 1 was resolved in favor of the client	1, of which 0 were resolved in the client's favor	1	2 (of which 1 resolved in favor of the client)
Reports/complaints regarding unauthorized access to or disclosure of personal data/confidential information	71 of which 3 were resolved in favor of the customer	2	1	2
Investigation requests** received from ANSPDCP***	6	2 (following the submission by Banca Transilvania of 2 notifications of personal data breaches)	1	3

*The number of requests to exercise rights under the General Data Protection Regulation (GDPR requests) resolved in favor of data subjects (including requests to exercise rights regarding data processed in the Credit Bureau's records). Some of the cases recorded in internal systems as "resolved in favor of the customer" represent situations in which, although the Bank did not consider the claims to be valid, an attempt was made to offer a solution to the customer.

**Investigation requests are requests for information sent to Banca Transilvania (BT) by this authority, as applicable, following: BT's submission of notifications of personal data breaches pursuant to Article 33 of the GDPR or, as applicable, following the Authority's receipt of complaints from data subjects alleging non-compliant processing or protection of their data by BT or other entities of the BT Financial Group.

***ANSPDCP: National Supervisory Authority for Personal Data Processing.

**** A resolution in favor of the customer does not necessarily imply an error on the part of the Bank.

Regarding other entities of the BT Financial Group, the situation regarding complaints resolved in favor of customers/data subjects concerning the exercise of rights guaranteed by legislation on the processing and protection of personal data is as follows:

	2025	2024
BT Direct	750 of the recorded requests were resolved in favor of the data subject	1,032 of the registered requests were resolved in favor of the data subject
BT Mic	22 of the requests filed were resolved in favor of the data subject	6 of the requests filed were resolved in favor of the data subject
BTAM	only one of the requests filed was resolved in favor of the data subject	None of the requests filed were resolved in favor of the data subject
BTCP	9 of the requests filed were resolved in favor of the data subject	9 of the registered requests were resolved in favor of the data subject
Salt Bank	19 of the requests filed were resolved in favor of the data subject	57 of the requests filed were resolved in favor of the data subject
Victoriabank	27 of the requests filed were resolved in favor of the data subject	4 of the requests filed were resolved in favor of the data subject
BT Leasing IFN	8 of the registered requests were resolved in favor of the data subject	None of the registered requests were resolved in favor of the data subject
BT Pensii	5 of the requests filed were resolved in favor of the data subject	Only one of the registered requests was resolved in favor of the data subject
BT Leasing Moldova	No requests of this type were received	No requests of this type were received
BT Broker	No requests of this type were received	None of the registered requests were resolved in favor of the data subject

Improvement Credit Collection	No requests of this type have been received	No requests of this type have been received

In 2025, 9 personal data breaches/thefts were identified across the entities of the BT Financial Group that posed risks to data subjects (4 breaches in 2024). These were managed and reported to the competent supervisory authority.

Internal communications regarding mandatory data protection training

Throughout 2025, the bank conducted a series of internal communications aimed at strengthening the organizational culture regarding the protection of personal data and compliance with GDPR requirements. The process began in late June with the launch of the mandatory module “Prevention and Management of Data Breaches 2025,” which emphasizes the importance of continuous training and incorporates the ANSPDCP’s recommendations regarding the increased frequency of training programs. To maintain the training pace and prevent potential delays, in September employees received an official notice regarding mandatory GDPR training. December 2025 concluded with a strategic communication aimed at reinforcing a culture of responsibility in the areas of security and compliance.



If the courses are not completed by the set deadline, the Bank has implemented a measure to block access to work systems until compliance is achieved.

Future Actions

In the coming period, the Bank will continue to strengthen organizational discipline in the area of data protection by conducting mandatory training programs for all employees of the BT Group, ensuring a uniform understanding of GDPR requirements and individual responsibilities.

In addition, the Chief Risk Officer will provide periodic updates on the risks associated with the processing of personal data, trends identified in incidents, and best practices for prevention, thereby contributing to maintaining a high level of compliance and strengthening the data protection culture throughout the organization.

Training

Minimum 95%: Completion rate for data protection training.

Deadline: Annual.

The target completion rate for data protection training, set at 95%, applies to entities in Romania, where GDPR requirements mandate formalized and periodic training. In 2025, the completion rate in Romania was over 99%, exceeding the set target.

In the Republic of Moldova, the subsidiaries' operations are conducted in accordance with local data protection legislation. Training programs are organized in a manner proportionate to the level of risk, targeting roles involving the processing of personal data or relevant operational responsibilities, to ensure an adequate level of compliance.

4. Governance Information

DR G1-1 – Business conduct policies and corporate culture

Banca Transilvania's corporate governance framework clearly defines the roles and responsibilities of its administrative, management, and supervisory bodies, with the primary objective of ensuring ethical business conduct and effective oversight. The Bank's strategic management is exercised by the General Meeting of Shareholders, which is responsible for setting strategic organizational objectives and allocating the necessary resources to achieve them. The powers of the Ordinary and Extraordinary General Meetings are governed by applicable laws and the Bank's Articles of Incorporation.

From an organizational standpoint, the Bank is structured into two main components: the management structure, consisting of the Board of Directors and the Leaders' Committee, and the operational structure, which includes the headquarters and the regional network of branches. The Board of Directors plays an essential role in overseeing the Bank's activities and ensuring strategic direction, while the Executive Committee is responsible for operational management, implementing the established strategy and managing day-to-day operations. To optimize performance, the Board of Directors has established specialized committees, such as the Audit Committee, the Compensation Committee, the Nomination Committee, and the Risk Management Committee, which contribute to good governance and effective risk management. The members of the Leaders' Committee, namely the CEO and Deputy CEOs, coordinate various areas of activity, promoting an organizational culture based on integrity and accountability.

Ethics and business responsibility are fundamental principles that guide the Bank's interactions with stakeholders and society at large. Adherence to ethical standards involves making decisions based on integrity, fairness, and transparency in all business practices, while also recognizing the impact of activities on employees, customers, suppliers, and the community.

The BT Financial Group has developed and implemented clear policies and procedures governing business conduct. The Board of Directors is responsible for approving and implementing the Code of Ethics and Conduct at the Group level, ensuring that the values and principles adopted by employees and management are upheld. This Code is aligned with the ethical and professional standards promoted in the financial and banking sector, in accordance with the guidelines and codes developed by the professional associations of which BT Financial Group is a member.

The Code of Ethics and Conduct govern essential aspects of business conduct, including relationships with suppliers, political activities, avoidance of conflicts of interest, fair competition, human resources policy, and the conduct of employees and members of the management and e bodies. All employees and members of management bodies are

required to know and comply with the provisions of the Code, and any violation will result in disciplinary action. This document does not replace the Internal Rules of Procedure (ROI) or the Organization and Administration Regulations (ROA), which govern operations, organization, employee and management responsibilities, corporate culture, and, finally, compliance with legal and ethical standards.

Compliance with integrity standards and the management of risks associated with non-compliant behavior are monitored by the Internal Audit Department and the Compliance Department. These departments conduct periodic audits and ensure that internal policies comply with external regulations, thereby contributing to the maintenance of an ethical and responsible work environment.

At the BT Financial Group level, the fight against bribery and corruption is governed by the ABC Commitment, also available on the Bank's website, which establishes reporting channels and procedures for reporting irregularities. The internal compliance framework includes the Code of Ethics and Conduct, the Whistleblowing Policy, the Policy on the Prevention and Management of Conflicts of Interest, the Public Procurement Policy, and specialized due diligence platforms used for third-party reputation screening. All employees and members of management are regularly informed and trained on these policies and are notified of any relevant legislative changes.

Within the BT Group, it is strictly prohibited to offer, accept, or solicit improper benefits in any form, regardless of whether they originate from the public or private sector. The following are expressly prohibited:

- Receiving money or benefits from customers or third parties in connection with the performance of job duties.
- Making payments or providing benefits that violate the law or Internal Rules of Procedure.
- Offering incentives to obtain business advantages.

Business conduct is subject to dual oversight at the subsidiary level. The General Shareholders' Meeting sets out the strategic direction, and the subsidiary management, composed of experts with relevant expertise, ensures the implementation and rigorous oversight of these principles within the operational framework.

The expertise of the administrative, management, and supervisory bodies regarding professional conduct.

The members of Banca Transilvania's Board of Directors have extensive experience in the banking sector, risk management, compliance, capital markets, and financial strategy development. Their qualifications and professional backgrounds, available on the Bank's website, align with the requirements of the Policy on the Assessment of the Suitability of Management Body Members at the Group level. With international careers and ongoing

training, they ensure effective governance, adapting to the dynamics of the financial market.

Similarly, the members of the Leaders' Committee possess expertise in areas relevant to banking such as financial management, audit, SME financing, retail banking, risk, compliance, and IT. Their educational backgrounds span fields such as economics, finance, accounting, law, marketing, and engineering, contributing to well-grounded leadership.

In 2025, members of BT's Leaders' Committee participated in 226 individual training sessions in essential areas such as anti-fraud, GDPR, compliance, sustainability, and leadership. Members of the management bodies of the Group's subsidiaries accumulated, in 2025 alone, over 540 hours of training in these key areas. Their expertise and conduct directly contribute to ensuring robust governance within the BT Financial Group, and the level of expertise varies among subsidiaries, depending on the specific characteristics of each market.

Policies in place to manage the material impact, risks, and opportunities related to business conduct and corporate culture

To manage the material impact, risks, and opportunities related to business conduct and corporate culture, Banca Transilvania and the BT Financial Group have implemented a robust framework of internal policies, which include:

1. Code of Ethics and Conduct – establishes the fundamental principles of integrity, responsibility, and transparency applicable to all employees and members of management.
2. Policy on the Assessment of the Suitability of Management Board Members – establishes the criteria for selecting and evaluating the professional competence, integrity, and ethical conduct of management board members within the Bank and its subsidiaries.
3. Anti-Bribery and Anti-Corruption Commitment – defines measures to prevent bribery, corruption, and conflicts of interest.
4. Whistleblower Policy – ensures a secure and confidential mechanism for reporting violations of ethical and compliance standards.
5. Conflict of Interest Prevention and Management Policy – sets forth measures to identify and eliminate conflicts of interest in the Bank's activities.
6. Public Procurement Policy – regulates supplier selection processes to ensure transparency and compliance with ethical standards.
7. Sustainability Policy – integrates ESG (environmental, social, governance) criteria into the organizational strategy and culture.
8. Data Protection and Privacy Policy – establishes rules for protecting the personal data of customers and employees.
9. Information Security Policy – focuses on protecting IT infrastructure and preventing cyber risks.

10. Internal Rules of Procedure and Organization and Administration Regulations – detail the rules of conduct, responsibilities, and expectations regarding organizational culture.

These policies are updated periodically and apply to Group entities, being communicated via the Bank's intranet to ensure compliance with ethical standards and a strong corporate culture. The implementation of these regulations through the Group relations policy and the risk management framework at the subsidiary level ensures a robust operational framework, delivering optimal results for customers, shareholders, and the business environment.

Establishing, Developing, Promoting, and Evaluating Corporate Culture

Corporate culture is anchored in the policy framework outlined above, which sets standards for integrity, professional ethics, social responsibility, and transparency. These policies and commitments are updated periodically to reflect both regulatory requirements and changes in the economic and social environment, as well as the evolution of the Bank and BT Group at various stages of their development.

The Board of Directors and senior management play a key role in developing and promoting the corporate culture by assessing how core values are implemented and upheld at all levels of the company. To ensure these principles are understood and embraced, regular training programs and sessions are organized at the Group level on topics such as compliance, sustainability, responsible leadership, and GDPR. These programs are accessible to all employees and are designed to reinforce organizational principles in day-to-day operations. Corporate culture is also promoted through various internal communication channels, including digital platforms, newsletters, regular meetings, and feedback sessions, which allow employees to stay informed about the company's initiatives and actively engage in its development.

To ensure continuous assessment of corporate culture, the Bank uses performance indicators. A key element is the collection of feedback through periodic surveys such as eNPS, which measure employee satisfaction and engagement levels. In addition, a series of relevant KPIs are monitored, such as the participation rate in training programs, the number of ethics reports, and employee retention rates. Periodic assessments conducted by the Board of Directors and management teams contribute to analyzing the state of the organizational culture, identifying areas for improvement, and adjusting strategies based on identified needs.

Mechanisms for reporting and investigating concerns regarding illegal conduct or conduct that violates the code of conduct or internal policies

To ensure a coherent framework for preventing, identifying, and managing incidents with a potential impact on compliance, business ethics, and operational security, the company

has established a series of formal reporting channels. These allow employees, collaborators and other relevant parties to report, in a confidential and, where appropriate, anonymous manner, situations such as violations of applicable laws, deviations from internal policies, suspicions of fraud, corruption, cybersecurity incidents, or other events with a negative impact.

To report irregularities, the Group makes the [Whistlelink](#) channel available to all stakeholders through a third party, which guarantees the confidentiality and protection of those who report issues. Whistlelink is a confidential reporting channel available to both business partners and BT Group employees for reporting potential fraud, violations of the Code of Ethics and Conduct, the Internal Rules of Procedure, or Internal Rules of Procedure specific to subsidiaries, as well as violations of the law (money laundering, bribery, etc.).

Through this application, reports can be submitted regarding legitimate and substantial concerns related to aspects of the business management framework, and all cases are reviewed by a specialized team, with each report receiving a unique code for tracking resolution. Reports are investigated by the appropriate departments, including the Bank's executive management. A face-to-face meeting can also be requested through the application.

During the meeting, the designated representative from the Corporate Governance and Non-Credit Legal Division, responsible for receiving the report, is required to prepare minutes documenting the information presented, in a durable and accessible format, subject to the consent of the person making the report. The reporting person will be given the opportunity to review and request corrections to the content of the minutes, as well as to express their agreement with them by signing. The procedure ensures compliance with the principles of confidentiality and the protection of the identity of persons submitting reports.

Throughout the reporting procedure, as well as after its resolution, any form of retaliation against the reporting person is strictly prohibited, in accordance with the provisions of Law No. 361/2022.

Specifically, reports concerning the subsidiaries BT Asset Management SAI and BT Capital Partners are redirected to their own reporting channels, namely MyAlertBTAM@btam.ro and myalert@btcapitalpartners.ro, to be handled in accordance with their own Internal Rules of Procedure.

In addition to the aforementioned channels, shareholders and investors may also submit reports, complaints, and grievances via email at investor.relations@bancatransilvania.ro. For other categories of stakeholders, reports and complaints may also be submitted through the BT call center.

In addition, for reports concerning ESG issues, the Group provides stakeholders with the email address: sesizariesg@btrl.ro.

Investigation of Incidents Related to Business Conduct

To ensure the prompt and fair investigation of incidents of misconduct, including corruption and the giving or receiving of bribes, the Bank implements a clear and rigorous procedural framework aligned with applicable legislation, including the provisions of Directive (EU) 2019/1937. This framework includes the following essential measures:

- **Secure and confidential reporting mechanisms** – The Bank provides secure channels for reporting incidents, protecting the identity of whistleblowers and preventing any form of retaliation.
- **Rapid Initial Assessment** – Reports are reviewed immediately to determine the severity and necessary actions, ensuring a prompt response.
- **Adherence to clear procedures and specific deadlines** – Investigations are conducted according to well-defined methodologies, within a reasonable timeframe, to ensure the efficiency and fairness of the process. The person making the report receives confirmation of receipt within 7 calendar days at the latest, and feedback on the progress of the case and any measures taken is provided within a reasonable timeframe, not exceeding 3 months from the confirmation (or from the expiration of the 7-day period). In the case of in-person meetings, within no more than 7 days of the request, the person will be informed of the proposed date and location for the reporting session. Reporting via an in-person meeting will take place within no more than 15 days of the date the request was submitted through the reporting channels.
- **Collection and analysis of relevant evidence** – All available data and documents are analyzed, including statements, records, and other evidence necessary for a proper assessment.
- **Transparency and communication** – The parties involved are notified of the progress of the investigation, while maintaining the necessary confidentiality.
- **Adoption of corrective and disciplinary measures** – Depending on the investigation's findings, the Bank applies appropriate measures.
- **Monitoring and continuous improvement** – Investigation procedures are periodically reviewed to identify and correct any deficiencies, thereby ensuring an efficient process that complies with applicable regulations.

Additionally, subsidiaries operating under the authorization, regulation, and/or supervision of the ASF and providing non-banking financial services to individuals or legal entities acting as consumers have implemented a procedure for receiving and resolving complaints, in accordance with the applicable legal framework.

The Legal, Digitalization, and Payment Services Department is responsible for analyzing and reporting all recorded warnings and investigated incidents at the BT Group level, as follows:

- Annually, in the first quarter of the following year to the Board responsible for analyzing and approving the report and, if necessary, ordering the adoption of measures at the BT Group level.
- Quarterly, to the Leaders' Committee.
- Whenever necessary, to the Leaders' Committee, in cases where alerts are significant and incidents are reported that could seriously affect the Group's reputation;
- Whenever necessary, to the National Bank of Romania – Supervision Directorate, in the event of legitimate and substantial concerns that could affect the Bank's safety, soundness, and reputation.

Training Policy on Business Conduct

The management of the subsidiaries participates annually in professional training and development programs tailored to their field of activity and position, with an emphasis on avoiding conflicts of interest, preventing fraud, and AML and KYC policies. The activities of key functions, such as compliance, risk management, internal control, and audit, are governed by rules and regulations issued by supervisory authorities, such as ASF, BNR, or BNM, requiring the maintenance of a high level of training through periodic programs.

Within Banca Transilvania, the BT Academy offers mandatory and optional courses on business ethics, managed by the HR Department, which oversees the functional structure and professional development of employees. Furthermore, in accordance with the selection and succession planning policy, the Bank implements an annual plan to identify and train future leaders, ensuring the continuous development of 1–3 successors for each key role through career management, specialized training, and involvement in strategic projects.

As for the subsidiaries, their staff and management participate at least annually in professional training and development programs, in accordance with their areas of expertise and fields of activity.

At the same time, training programs dedicated to business ethics and professional conduct contribute to strengthening the organizational culture and aligning employee behavior with applicable standards. By including relevant topics such as managing conflicts of interest, risks associated with certain activities, and compliance requirements regarding anti-money laundering, these trainings support the prevention and effective management of operational and reputational risks, reinforcing the Group's commitment to integrity and professional responsibility.

Policies and procedures established for the prevention, detection, and resolution of allegations or incidents of corruption or bribery

BT Group has a regulatory framework for preventing, detecting, and resolving incidents of corruption and bribery, based on a zero-tolerance policy toward such acts. The primary reference document is BT Group's Code of Conduct and Ethics, which establishes general guidelines in this area, in accordance with national and European regulations.

The internal policy on fraud risk management clearly defines corruption as any form of abuse of power exercised for the purpose of obtaining personal or Group benefits, manifested through the offering, promise, solicitation, or receipt of undue benefits, directly or indirectly. The Group acknowledges that the line between unethical behavior, corruption, and fraud is sometimes not well understood, as these behaviors are interdependent, and tolerating unethical practices can increase the risk of corruption and, consequently, give rise to fraud risks.

In this context, the internal governance framework and anti-corruption policies establish clear rules for preventing, identifying, and sanctioning acts of corruption, applicable to all employees and individuals acting on behalf of the Group. Internal policies and procedures underpin the application of the zero-tolerance principle toward corruption and support an organizational culture based on ethics, integrity, and accountability.

The procedure for conducting investigations at the BT Group level defines a uniform standard within the Bank regarding the reporting, investigation, and inquiry of fraud-related events and outlines the tasks and responsibilities of each BT Group structure or entity with duties within these processes.

Investigation of Corruption-Related Incidents/Events

The process of investigating corruption-related incidents or events is conducted based on internal procedures that guarantee the independence of the investigation, compliance with applicable legislation, and the protection of the fundamental rights of the individuals involved.

Regardless of how the investigation is initiated (complaint, report, or ex officio), if, before the investigation begins or during its course, indications arise regarding the direct or indirect involvement of a member of the Board of Directors (BoD), the Leaders' Committee (LC), a Senior Executive Director, Executive Director, Coordinating Director, Director, or Deputy Director within BT/BT Group, it is mandatory to obtain approval to continue the investigation from the competent bodies or persons, through the management of the Audit Department (AD), as follows:

- The Board of Directors (BoD) of BT - in cases where the person involved is a member of the Board of Directors of BT (the decision to be made without the presence or knowledge of the respective member), of the Board of Directors of any subsidiary of BT Group, of the BT Leaders' Committee (MC), or is a Senior Executive Director/Executive Director of BT;
- The CEO and Deputy CEO, CRO - in cases where the person involved is a Managing Director, Director, or Deputy Director within BT/BT Group;
- The Deputy CEO, CRO - with respect to other BT/BT Group employees, only in cases where the investigation is initiated on the CRO's own initiative.

These measures ensure the integrity of the investigation process, preventing conflicts of interest, and maintaining the objectivity of investigations within the Group.

If a report does not clearly indicate a suspicion of fraud, the anti-fraud department may conduct preliminary checks to properly classify the incident (suspicion of operational error, disciplinary violation, etc.), and depending on the outcome, it may initiate an investigation, refer the report to other relevant departments, or close the case if the suspicions are not confirmed. Investigations are aimed exclusively at clarifying the facts and do not target individuals or BT/BT Group employees.

Appointment of Investigators

Investigations may be conducted by:

- Internal investigators, typically employees of the Anti-Fraud Department (AFD). AFD employees report functionally to the Anti-Fraud Director and administratively to the Deputy CEO, CRO, a key autonomous position that reports to the governing bodies (the Leaders' Committee and the Board of Directors) to ensure the accuracy and fairness of the conclusions.
- External investigators, namely third parties authorized by the Bank in accordance with applicable law. In this case, the Bank always designates an internal representative from the DA or from the department that reported the case as the contact person for the duration of the investigation.

Regardless of their origin, investigators are required to conduct the investigation in a detailed and systematic manner, in compliance with the law and respect the individual rights (including privacy and personal life), collecting all relevant evidence and maintaining the independence of the process.

The process of reporting results to administrative, management, and supervisory bodies

Preparation and submission of the investigation report

Upon completion of the investigation, a formal report is prepared and submitted to:

- To decision-makers, for the implementation of appropriate measures or for information purposes, depending on the conclusions;
- Other departments, divisions, business lines, or subsidiaries of the BT Group, if the investigation revealed issues of interest to them. In such cases, the investigator/team may propose the distribution of the information (in full or in the form of a memo/excerpt/email). The proposal is subject to approval by the Board of Directors, the Audit Committee, the CEO, or the CRO, as applicable.

If the investigation highlights issues regarding internal processes or the organization of activities, the report is forwarded to the director of the responsible department, so that the information may be utilized in the performance of the duties set forth in the ROA.

Procedures Following Report Approval

All approved reports are submitted to the Operational Risk Committee (CRO). For reports containing proposals to modify or supplement the processes/workflows/procedures related to which fraud occurred, the following steps are taken to prevent recurrence:

1. Within a maximum of two months of the report's approval, AFD, together with the process/procedure/workflow responsible, establishes a plan for implementing corrective measures, with clear deadlines.
2. The plan is submitted to the CRO for approval, at which point the committee may make additional requests, which are subsequently included in the final version.
3. The AFD and the process owners report to the CRO:
 - the status of implementation at each deadline specified in the plan,
 - any changes or delays that have occurred, for approval.
4. If the AFD does not receive feedback within the timeframe specified in point 1 or if the method of implementing the measures cannot be agreed upon, the AFD sends to the CRO a memo describing the situation for a decision.

Conflict of Interest

At the BT Group level, the issue of conflicts of interest is primarily addressed through the Code of Ethics and Conduct, and the subject is also covered in other specific regulations adopted at the group level that address compliance risk. Additionally, the Policy on the Prevention and Management of Conflicts of Interest at Bănci Transilvania S.A., which

applies directly to subsidiaries, describes the circumstances in which conflicts of interest may arise and how they should be managed.

Employees within the BT Group must complete the conflict-of-interest declaration in the dedicated IT application, including those who do not identify such situations. Employees must report any existing or potential conflict of interest, concerning themselves or other employees, to their direct supervisor and to management.

The authority to assess potential conflicts of interest lies with various committees, depending on the category of personnel concerned, as follows:

- For members of management bodies, the assessment is conducted by the Compensation Committee and the Nomination Committee.
- For Executive Directors and members of the management body, the authority to assess lies with the Board of Directors.
- For staff in management positions, such as agency or branch managers, the analysis is conducted by the Leaders' Committee.
- For staff in operational and lower management roles, the Human Resources Committee is responsible for the analysis.

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In 2025, at the Group level, no reports were received regarding the existence of potential conflicts of interest.

Communication of corruption prevention and detection policies to relevant individuals

The responsibility for adopting the internal regulatory framework lies with the management of each entity within BT Group. The primary channel for disseminating the Group's resources regarding applicable regulations is the Bank's intranet.

Thus, in accordance with the Policies on Group Relations and the risk management framework at the BT Group level, the Bank's Internal Rules of Procedure, which are also applicable at the subsidiary level, are posted on the BT Intranet in the "Joint Subsidiary Regulations" section and communicated via email to their management.

For subsidiaries that do not have access to the BT network, the Internal Rules of Procedure Management Service within the Compliance Department, together with the IT Operations Department, the Information Security Department, and the non-banking subsidiaries of the BT Financial Group, collaborate to identify the most effective methods for disseminating relevant regulations. The issuing department within the Bank identifies the scope of the regulations and forwards them to the subsidiaries, which analyze the impact on their own methodological framework and implement any necessary adjustments; these adjustments must be approved internally, but no later than the second meeting of the subsidiary's Board of Directors following notification. The subsidiaries confirm their approval to the Financial

Subsidiaries Department/Investment Subsidiaries Department at BT, which monitors the implementation of the requirement.

In the case of similar activities not covered by regulations applicable to the entire Group, the department responsible communicates the principles of uniform operation to the subsidiaries, and they adjust or issue their own regulations, in accordance with the workflow regarding Group Relations Policies and the risk management framework. Subsidiaries classified as financial institutions align their Internal Rules of Procedure with the requirements of the BT Financial Group.

Nature, scope, and depth of anti-corruption or anti-bribery training programs

The training programs developed at the group level regarding anti-corruption or anti-bribery training address the main challenges that may be encountered in the company's day-to-day operations, namely:

- Fraud and corruption
- Fraud prevention
- Prevention of money laundering and terrorist financing
- Know Your Customer
- Prevention and management of conflicts of interest.

All these programs cover a variety of topics, depending on the difficulty level of the course (i.e., beginner, intermediate, or advanced), and include elements of the internal procedures in place to prevent illegal or unethical behavior.

Furthermore, where it is not possible to conduct such training and development programs based on internal expertise, third-party training services are utilized to ensure the necessary knowledge and expertise within the companies of the BT Group.

Management receives ongoing training and professional development just like the Group's employees, but the topics of these programs are tailored to the scope of responsibilities within the company, the nature of its business, and the expertise of the individuals holding these positions.

Positions with the highest risk of corruption and bribery

Within the BT Financial Group, the roles with the highest risk of corruption and bribery are those involved in financial decision-making, loan approval, managing relationships with large clients, and procurement. These include the area of retail credit analysis, where employees may be exposed to the risk of receiving bribes for approving ineligible loans, and the Procurement, Investments, and Logistics Department, where there is a risk of favoring certain suppliers.

Additionally, commercial banking for legal entities, including the Large Corporate Clients, SME, and Agribusiness segments, presents a high risk, as account managers may be influenced to grant preferential terms. The Compliance Department and the Internal Audit Division, although they play a preventive role, may be exposed to the risk of corruption for concealing certain irregularities, and top management positions, having decision-making power over financial strategies, have the potential to be influenced in favor of private interests.

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In 2025, 95% of positions exposed to risk were covered by training on corruption-related issues, compared to 90% in 2024

2025	At-risk functions	Managers	AMSB	Other own workers
Training coverage				
Total	10,067	606	52	3,654
Total receiving training	9,537	542	39	3,203
Delivery method and duration				
Classroom training	1,551	130	3	4
Computer-based training	84,800	2,802	276	15,566
Frequency				
How often training is required	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly
Topics covered				
Prevention and Combating of Money Laundering (AML)	✓	✓	✓	✓
Anti-fraud	✓	✓	✓	✓
Conflict of Interest	✓	✓	✓	✓
Know Your Customer (KYC)	✓	✓	✓	✓
Code of Conduct, Conflict of Interest, Whistleblowing Policy	✓	✓	✓	✓

*The total number of employees in each category represents active employees as of December 31, 2025.

**Depending on the type of course, their frequency may be annual, semiannual, or quarterly.

2024	At-risk functions	Managers	AMSB	Other own workers
Training coverage				
Total	9,968	706	45	3,950
Total receiving training	8,968	525	36	2,534
Delivery method and duration				
Classroom training	18,148	151	-	506
Computer-based training	36,495	1,756	131	7,652
Frequency				
How often training is required	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly	Annually, Semi-annually, Quarterly
Topics covered				
Prevention and Combating of Money Laundering (AML)	✓	✓	✓	✓
Anti-fraud	✓	✓	✓	✓
Conflict of Interest	✓	✓	✓	✓
Know Your Customer (KYC)	✓	✓	✓	✓
Code of Conduct, Conflict of Interest, Whistleblowing Policy	✓	✓	✓	✓

*The total number of employees in each category represents active employees as of December 31, 2024.

**Depending on the type of training, the frequency may be annual, semiannual, or quarterly.

Note: Comparative figures have been updated following a methodological review conducted in 2025, which included a more detailed analysis of risk-exposed functions within the BT Group and the harmonization of data with consolidated databases regarding participation in training programs. This update reflects an improvement in the process of collecting and aggregating data at the Group level.

Actions and resources for managing material impacts, risks, and opportunities related to corruption and bribery

In 2024, Banca Transilvania implemented a well-structured action plan to manage the material impact, risks, and opportunities related to corruption and bribery. Key measures included the ongoing organization of mandatory employee training, with a focus on high-risk areas, as well as the conduct of annual internal audits of procurement and contracting processes to identify potential irregularities.

Additionally, in 2024, a rigorous system for reviewing supplier relationships through due diligence and reputational screening was implemented using the RiskRate application, which helps the Bank prevent exposure to fraud, acts of corruption, and other reputational risks. These measures are applied across the entire Group and the Bank's value chain, having a direct impact on employees, suppliers, and customers.

In the procurement area, Banca Transilvania applies clear criteria for contract approval through its internal procedure for the procurement of works, goods, and services. Prior to approving a procurement, the procurement officer or internal beneficiary submits a request regarding potential conflicts of interest and reputational risks associated with the winner of the procurement procedure, the shortlisted finalists, or the supplier whose contract is being extended or awarded directly. The Bank has established a timeline for optimizing actions, which includes:

- Improving the anonymous reporting application for suspected corruption to ensure a more efficient and secure process;
- **Updating the Code of Ethics and Conduct** to reflect the latest regulations and best practices;
- Calibrating the due diligence application for contractual partners, followed by auditing suppliers and optimizing the database;
- **Integrating subsidiaries into the system**, thereby expanding visibility and control over contractual partners;
- Introducing a mandatory training course for employees focused on preventing bribery and corruption (Anti-Bribery and Corruption – ABC).

In addition, as a remedial measure, the Bank maintains active cooperation with the competent authorities in cases of identified corruption or bribery. The implementation of this plan is carried out within the budgetary limits established by Banca Transilvania, ensuring the efficient use of resources to strengthen organizational compliance and integrity.

DR G1-4 – Incidents of corruption or bribery

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In 2025, at the BT Group level, there were no:

- convictions for violations of anti-corruption and anti-bribery laws.
- Financial penalties for violations of anti-corruption and anti-bribery laws.

During the 2025 fiscal year, the Bank provided training to its employees who are at risk regarding its policy. For these risk-exposed positions, training is mandatory, but the company also made voluntary training available to other employees.

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In 2025, the total number of training hours on corruption-related issues was twice as high as in 2024, 39,030 hours compared to 17,747 hours.

Relationship with Suppliers

The relationship with suppliers is managed within Banca Transilvania through a procurement process governed by internal rules and procedures dedicated to the procurement of works, goods, and services. Procurement covers a wide range of categories, such as investments and logistics, IT, human resources, marketing and communications, information security, legal services, and retail operations. The process is coordinated centrally by the procurement departments, in collaboration with specialized divisions that manage specific types of procurement, depending on the nature of the goods or services being contracted.

Supplier selection is typically conducted through a competitive process, which involves evaluating multiple bids and utilizing digital tools dedicated to procurement management. For high-value contracts, additional compliance checks are performed, including an analysis of potential conflicts of interest and reputational risks.

Sustainability criteria are also gradually being integrated into supplier relationships by collecting information on their environmental, social, and governance practices and by including relevant elements in the evaluation process. Aspects such as the existence of environmental management systems, the energy efficiency of products, or compliance with labor conditions are taken into account in the supplier analysis.

At the same time, the Bank works extensively with local suppliers. In 2025, 97% of the Bank's suppliers were based in Romania, a share that reflects the predominantly local structure of the Bank's supply chain.

4.1 Combating Financial Crime

Combating money laundering, corruption, and terrorist financing

External Regulatory Framework

The Group operates within a European and national regulatory framework applicable to the prevention and combating of money laundering, corruption, and terrorist financing, in accordance with international standards and European Union requirements regarding AML/CFT.

At the European Union level, the regulatory framework consists of the AML legislative package adopted in 2024, which includes Regulation (EU) 2024/1624 on the prevention of the use of the financial system for the purposes of money laundering and terrorist financing, Directive (EU) 2024/1640 on national mechanisms for preventing and combating AML/CFT, as well as Regulation (EU) 2024/1620 establishing the European Anti-Money Laundering and Counter-Terrorist Financing Authority (AMLA). This framework replaces and strengthens the previous regime established by Directive (EU) 2015/849, as amended by Directive (EU) 2018/843.

At the national level, European requirements are implemented through applicable primary and secondary legislation, including Law No. 129/2019, as subsequently amended and supplemented, until the date of full transposition of the new European requirements.

In Romania, the competent authorities have intensified their AML/CFT supervision and control activities in recent years, including in applying the international sanctions regime.

Compliance with this framework requires the implementation of robust governance mechanisms, effective internal processes for identifying, assessing, and mitigating ML/FT risks, as well as significant investments in IT systems and technological solutions for monitoring, screening, and reporting. At the same time, it is necessary to allocate dedicated resources for prevention, continuous monitoring, and reporting to competent authorities.

Internal Regulatory Framework

The Group has implemented a unified internal system for preventing and combating money laundering, terrorist financing, corruption, and violations of international sanctions regimes, designed in accordance with applicable legal requirements and best practices in the field of AML/CFT. The system is built on an integrated, risk-based approach, supported by a unified framework of common rules, policies, and procedures applicable to Group entities, as well as by adequate internal controls.

This framework applies across the entire organization, including employees, management structures, and suppliers, and is supported by clear governance structures, well-defined responsibilities and monitoring/control mechanisms. The measures implemented

contribute significantly to reducing compliance and financial crime risks, though they cannot eliminate them entirely, given the complexity, dynamics, and continuous evolution of financial crime patterns.

At the BT Group level, the AML/CTF framework is integrated into a broader system of compliance, ethics, and accountability, which also includes anti-corruption measures, compliance with applicable legislation and competition rules, management of conflicts of interest, ensuring political neutrality, information security, protection of personal data, and respect for human rights.

Banca Transilvania has an internal regulatory framework structured around four main pillars that support the management of compliance and financial crime risks:

- regulations regarding know-your-customer
- policies related to the compliance function
- policies dedicated to the prevention of money laundering and terrorist financing
- general policies applicable across the entire organization

This set of regulations ensures a consistent approach that is aligned with legal requirements, helping to strengthen governance and a culture of compliance within the Bank.

Know Your Customer

The customer due diligence process aims to identify, analyze, and assess the risks associated with each customer prior to establishing or continuing a business relationship, by applying proportionate customer due diligence measures.

As defined by the Bank, the term “customer” includes any natural person, legal entity, or unincorporated entity with which the Bank conducts business relationships or with which it carries out other operations on a permanent or occasional basis. A customer is any person with whom, during its activities, the Bank has negotiated a transaction, even if that transaction was not finalized, as well as any person who benefits or has benefited in the past from the Bank’s services. Persons who hold only the following capacities are not considered clients: legal representative, authorized representative, delegate, beneficial owner, user of supplementary cards, guarantors/sureties/co-debtors in credit agreements.

Banca Transilvania accepts as customers:

- resident or non-resident individuals, provided they submit identification documents to the Bank and request the establishment of a business relationship;
- adult resident individuals who apply to establish a business relationship through digital channels;
- resident legal entities that prove, based on the documents submitted, their legal establishment and operation;

- resident legal entities applying to establish a business relationship through digital channels, provided the following conditions are met: the sole director and shareholder is a resident natural person, with no identified risk factors;
- non-resident legal entities that submit to the Bank documents proving their legal establishment and operation, in a notarized certified translation;
- any person or entity that uses a service or product offered by the Bank, whether or not the transaction involves opening a checking account.

Establishing a business relationship with clients entails the following requirements:

- identifying customers and verifying their identity;
- identifying the risk factors associated with customers;
- classifying customers into the associated risk score/category;
- establishing the hierarchical level of approval for accepting customers, namely:
 - the authority to verify and sign account opening documentation/supervision via the onboarding application;
 - the authority to approve the initiation of the business relationship, based on the assigned risk score/category;
- adopting decisions, highlighting the hierarchical positions, tasks, and level of responsibility assigned to the structures/persons involved in the application of customer due diligence measures.

During the enrollment and account opening/data update phase, the following requirements must be met:

- identifying risk factors associated with risk categories and automatically calculating the final risk score assigned to the customer based on the criteria in the risk matrix;
- classification into risk categories based on the calculated risk score;
- the authority to verify and sign account opening documentation, as well as supervision via the onboarding application;
- the authority to approve the initiation/continuation of the business relationship.

High-risk customers include, among others, non-residents, customers providing money or value transfer services (MVTs), entities providing financial services such as currency exchange, money transfers, or the issuance of payment instruments (MSB), politically exposed persons, and correspondent banking institutions. Enhanced due diligence measures apply to these customers, consisting of senior management approval, product allocation based on eligibility criteria, and continuous, risk-based monitoring of transactions.

The process of updating data at the customer portfolio level is carried out according to the assigned risk level, namely:

- high-risk clients / clients in the high-risk and very high-risk categories: annually;
- medium-risk customers / those in the standard-risk categories: every 3 (three) years;
- low-risk customers / from the low-risk categories: every 5 (five) years.

Assessment of ML/TF risks and international sanctions across the entire business

The Bank's risk-based assessment is a process through which the threats and vulnerabilities to which the Bank is exposed are identified, and the probability and impact of money laundering and terrorist financing risks are evaluated. Based on this assessment, high-risk areas are identified, which must be mitigated through proportionate measures and a continuous monitoring process.

The Bank conducts an ML/FT and international sanctions risk assessment across its entire operations considering risk factors such as: customer type, products/services, transactions, geographic areas, distribution channels, and risks related to territorial units. Stress tests are incorporated into the assessment processes to analyze the impact of increased transaction volumes, emerging patterns, systemic failures, and regulatory changes; the results are used in the strategic decision-making process, as well as to define remedial measures and optimize resource allocation.

As part of the ML/FT risk assessment process, the inherent risk associated with relevant risk factors is identified and evaluated; subsequently, the effectiveness and adequacy of existing controls are analyzed to determine the residual risk level, which reflects the actual exposure after the application of mitigation measures. ML/FT risk monitoring consists of actions to monitor the status of implementation of ML/FT risk mitigation measures and periodic testing of ML/FT risk mitigation measures to verify/identify whether: i) the Bank's own risk assessments and the methodology for conducting and updating them are relevant, and ii) there is a need to update the risk assessment. The Bank's ML/FT risk assessment, in accordance with the methodology, is updated annually or at 12–18-month intervals (depending on national assessments or feedback from the supervisory authority), as well as whenever necessary, depending on legislative developments at the national and European levels or operational changes at the Bank regarding customers, products, transactions, distribution channels, and geographic areas.

Product Governance

As part of the compliance risk management and product governance process, digital projects affecting the corporate and retail business lines are analyzed by the Compliance Division from a compliance risk perspective. This assessment aims to ensure that new initiatives or proposed changes comply with legal requirements regarding know-your-customer, anti-money laundering, and counter-terrorist financing.

Compliance risk opinions are issued as early as the initial stages of project development. Subsequently, product assessment documentation is prepared, based on which the compliance risk level for each banking product or service is determined, in line with the criteria set forth in Internal Rules of Procedure.

The assessment process focuses on identifying areas requiring additional risk management measures in the KYC/AML/CFT and international sanctions domains. The Compliance Division proposes proportionate monitoring and mitigation actions, depending on the identified cases. If the identified risks cannot be adequately mitigated, a negative compliance opinion may be issued, resulting in the non-approval of the launch of the respective product or service.

Classification of products based on ML/TF risk

Banking products are classified into risk categories based on a score derived from the assessment of their characteristics and the risks associated with their use from the perspective of money laundering, terrorist financing, and international sanctions. The assigned risk level determines the corresponding level of monitoring, the application of control mechanisms, and the approval level.

Low risk level: products that, by their nature and manner of use, present non-existent or insignificant risks. They allow for the full application of KYC measures, transaction monitoring, and record-keeping (e.g., mortgage loans for individuals, Credit Noua Casă, IMM Invest loans, bancassurance products, payroll distribution agreements).

Medium-low risk: products that involve minor but manageable risks from an AML/CFT perspective. They allow for the application of standard customer due diligence measures and adequate transaction monitoring (e.g., letters of credit, time deposits, savings accounts, working capital loans, credit cards, SME factoring).

Medium risk level: products that, depending on the nature and volume of use, may pose controllable but higher risks, requiring increased monitoring and the application of standard and additional due diligence measures (e.g., cash transactions, international transfers, currency exchange, BT Pay, internet banking, instant transfers, Western Union).

Medium-high risk level: products that may generate significant risks and for which there are limitations in the full application of identification, monitoring, or control measures. They require additional controls and approval at a higher management level.

High risk level: products that pose major or unacceptable -related risks, either due to control limitations or exposure to jurisdictions or activities with very high ML/TF risk. These are not undertaken by the bank without special approval or may be excluded from the offering.

The bank does not hold products classified as medium-high or high risk in its portfolio.

Roles and Responsibilities

The compliance function is organized centrally and is independent, reporting to the Deputy CEO and Chief Risk Officer, who is not involved in business activities and is responsible for coordinating risk management and the internal control system. The compliance function reports directly to executive management (the Leaders' Committee) and indirectly to the Board of Directors, in line with the requirements regarding the independence of the compliance function.

Main responsibilities of the Compliance Division:

- ensuring the implementation of compliance function requirements within the Bank, an independent Level II internal control function, as defined in the Compliance Policy of Banca Transilvania S.A.;
- assessing, quantifying, managing, and reporting compliance risk, both in the area of general compliance, including MiFID, and in the KYC/AML/CFT area;
- identifying compliance risk through continuous monitoring and Level II compliance control activities;
- approving new products or significant changes to existing products, processes, and systems;
- receiving draft Internal Rules of Procedure from the Bank's specialized organizational units and submitting them (depending on the assigned authority/mandate) for review/approval by the Leaders' Committee and the Board of Directors, respectively;
- managing the entire portfolio of Bank Transilvania's Internal Rules of Procedure;
- ensuring Banca Transilvania's compliance with legal requirements regarding know-your-customer (KYC), the prevention and combating of money laundering and terrorist financing, and the enforcement of international sanctions;
- monitoring the branch customer portfolio for compliance with KYC standards and identifying associated risks;
- maintaining relationships with competent authorities (e.g., ONPCSB) and managing requests regarding the accounts and activities of targeted customers;
- conducting training for all Bank staff on General Compliance and KYC/AML/CFT issues, and testing their knowledge following the training;
- developing the Annual Compliance Program;
- coordinating the alignment of principles regarding the compliance activities of Banca Transilvania's subsidiaries, both in terms of compliance risk management and

control, as well as standards for KYC and AML and counter-terrorist financing, including by providing specific support upon request; collaborating with other internal control functions, risk management and internal audit, on specific issues, whenever necessary.

AML/CFT governance is ensured through periodic reporting to senior management and relevant committees, clear mechanisms for escalating significant deficiencies, the involvement of the internal audit function in assessing the independence and effectiveness of the control framework, as well as through the systematic monitoring of identified deficiencies, followed by the implementation and tracking of remedial measures, in line with applicable prudential supervisory requirements.

At least once a year, the Coordinating Director of the Compliance Division submits an annual compliance report to management, which includes an assessment of the Bank's exposure to money laundering and terrorist financing risks, the level of residual risk, proposed or implemented mitigation measures, the status of their implementation, as well as other relevant aspects regarding the effectiveness of the AML/CFT governance and control framework.

Monitored indicators

The Bank tracks an extensive set of indicators in the areas of KYC/AML/CFT and international sanctions on a quarterly basis, which are subject to reporting to the supervisory authority. These are used to assess the effectiveness of the control framework and to identify areas requiring strengthening, operational optimization, or additional resource allocation.

CUSTOMERS	2025	2024
% of total customers of non-resident customers	2.10	1.76
% of total customers with origin/citizenship/residence/country of registration in countries identified by the European Commission/FATF as high-risk countries or as having strategic deficiencies in AML/CFT	0.31	0.15
% of total customers of customers having at least 1 beneficial owner with origin/citizenship/residence in countries on the list of countries identified by the European Commission/FATF as high-risk countries or as having strategic deficiencies in AML/CFT	0.35	0.19
% of total customers of customers having at least one non-resident beneficial owner	0.45	0.40
% of total non-resident customers of customers with residence/country of registration in offshore countries	0.27	0.24

% of total clients of private banking clients	0.11	0.10
% of total private banking clients of non-resident private banking clients	3.29	3.27
% of total customers of PEP customers	0.04	0.03
% of total PEP customers of non-resident PEP customers	1.99	1.53
% of total customers of customers with RTS during the reference period	0.0297	0.02
% of total customers with requests for information from authorities during the reference period	0.00962	0.01071
% of total customers who are in risk classes higher than the medium/standard/ordinary/normal category	2.73	2.50
% of total customers in risk classes lower than the medium/standard/ordinary/normal category	91.35	88.07
% of total customers who hold/have held accounts in foreign currency only	0.18	0.20
% of total customers with data not updated within the timeframe specified by Internal Rules of Procedure	0.49	0.98
% of total customers in risk classes higher than the medium/standard/usual/normal category at the end of the reference period/at the time of closing the business relationship of customers in risk classes higher than the medium/standard/ordinary/normal who held at least 1 high-risk product at the end of the reference period/at the time of closing the business relationship	0	0
% of total corporate and similar customers of payment institutions and electronic money institutions	0.00160	0.00035
% of total customers of payment institutions and electronic money institutions of non-resident customers of payment institutions and electronic money institutions	10.00	0
% of customers with a newly opened account in the customer portfolio (number of new customers / (number of customers in the reference period – number of closed accounts))	9.74	10.35
% of total customers to whom simplified customer due diligence measures are applied	0	0
Customers for whom a decision was made to initiate/continue the business relationship in the context of an unfavorable ML/FT opinion during the reporting period	4	0
Relationships rejected (not initiated or not maintained) due to incomplete customer information/inability to apply standard customer due diligence measures	94	16

PRODUCTS/SERVICES	2025	2024
Products assessed as high risk at the end of the reporting period	0	0
% of total customers in risk classes higher than the medium/standard/ordinary/normal category at the end of the reference period of customers in risk classes higher than the medium/standard/ordinary/normal category who held at least one of the IB/MB products	67.03	74.50
% of customers with increased card limits during the reference period out of the total number of customers holding at least one card	10.99	10.19
% of customers with increased IB/MB transaction limits during the reference period out of the total number of customers holding at least one of the two products (IB/MB)	0	0
% of customers holding at least one of the IB/MB products at the end of the reference period out of the total number of customers in the portfolio at the end of the reference period	46.11	51.62
Audit reports that included the assessment of KYC/AML/CFT processes/components/structures among their objectives	Internal Auditor (2025)	Internal Auditor (2024)
Number of audit engagements scheduled during the reporting period, including KYC/AML/CFT reviews (including at the level of relevant IT applications)	28	28
Number of actions performed during the reporting period, including KYC/AML/CFT checks (including at the level of relevant IT applications)	30	31
Total number of KYC/AML/CFT-related recommendations issued during the reporting period as part of these actions	47	33
Total number of KYC/AML/CFT-related recommendations for which an extension of the initially set implementation deadline was approved during the reference period	0	1
Total number of recommendations related to KYC/AML/CFT that have reached their deadline and remain unimplemented	0	0

Training

Banca Transilvania ensures, through its Compliance Division, ongoing training for all BT Financial Group personnel across all lines of defense. Within the Bank, staff training on matters related to know-your-customer standards, anti-money laundering, and counter-terrorist financing is conducted by: The Compliance Division, which is responsible for ensuring and monitoring employee training on issues related to know-your-customer standards and the prevention and combating of money laundering, as well as the financing of terrorist acts, across the entire BT Financial Group; The Deputy Director of Operations / Head of Operations / mentor, who are the individuals responsible for training employees at

each branch on issues related to know-your-customer standards and the prevention and combating of money laundering, as well as the financing of terrorist acts. The Risk / Compliance Director / Compliance Officer of each subsidiary, who is responsible for training employees to comply with requirements regarding customer due diligence standards and the prevention and combating of money laundering within the subsidiaries.

The staff training and testing program includes topics with appropriate levels of complexity and frequency, differentiated according to the type of responsibilities and specific competencies of the positions, across all lines of defense. Staff training on KYC/AML/CFT issues is determined based on the skills required for an employee to properly perform tasks in this area, depending on the compliance responsibilities established in the job description and the level/type of knowledge identified following the analysis of the assessment results. The assessment of knowledge regarding the prevention and combating of money laundering and terrorist financing is conducted annually for all eligible and active staff of the Bank, with the testing tailored to the specific knowledge level of each Group. The calculation and reporting of participation rates in the annual testing will be carried out in accordance with the quantitative assessment criteria, and the objective is considered achieved when: $\geq 90\%$ of all eligible staff participate in the courses intended for all BT Group staff; $\geq 95\%$ of scheduled staff participate in the mandatory tests.

Planned actions to improve performance in combating financial crime

The Group plans to implement a unified KYC process for shared customers, based on a single risk scoring model that applies uniformly across all entities. This initiative aims to standardize customer risk assessment criteria, reduce differences in approach among entities, and consolidate a unified perspective on the Group's exposure to money laundering and terrorist financing risks.

The single scoring model will integrate a coherent set of risk factors, including customer type, geographic exposure, products and services used, transactional behavior, and other relevant indicators, in accordance with the risk-based approach principle.

The implementation of this approach is intended to support consistent customer classification, the proportionate application of due diligence measures, and improved monitoring of business relationships across the entire Group, contributing to the strengthening of the capacity to identify, assess, and manage ML/TF risks.

ADDENDUM 1. Disclosure Requirements Covered by the Sustainability Statement

The table below presents the disclosure requirements from ESRS 2 and the material topic standards and indicates where information regarding each specific requirement can be found.

List of material disclosure requirements		Page number
BP-1	General basis for preparation of the sustainability statements	4
BP-2	Disclosures in relation to specific circumstances	6
GOV-1	The role of the administrative, management and supervisory bodies	11
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	22
GOV-3	Integration of sustainability- related performance in incentive schemes	24
GOV-4	Statement on sustainability due diligence	25
GOV-5	Risk management and internal controls over sustainability reporting	26
SBM-1	Market position, strategy, business model and value chain	28
SBM-2	Interests and views of stakeholders	56
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	60
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	279
E1	CLIMATE CHANGE	89
E1.GOV-3	Integration of sustainability-related performance in incentive schemes	24
E1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	62
E1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
E1-1	Transition plan for climate change mitigation	The Group does not yet have a climate transition plan, but its development is underway, in line with the strategic direction adopted.
E1-2	Policies related to climate change mitigation and adaptation	109
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	89
E5	RESOURCE USE AND CIRCULAR ECONOMY	115
E5.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
E5-1	Policies related to resource use and circular economy	115
E5-2	Actions and resources related to resource use and circular economy	118

E5-3	Targets related to resource use and circular economy	118
S1	OWN WORKFORCE	
S1.SBM-2	Interests and views of stakeholders	56
S1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	62
S1-1	Policies related to own workforce	124
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	142
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	145
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	147
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	149
S1-6	Characteristics of the undertaking's employees	119
S1-9	Diversity metrics	119
S1-10	Adequate wages	127
S1-13	Training and skills development metrics	129
S1-14	Health and safety metrics	137
S1-16	Remuneration metrics (pay gap and total remuneration)	127
S1-17	Incidents, complaints and severe human rights impacts	134
S4	CONSUMERS AND END-USERS	151
S4.SBM-2	Interests and views of stakeholders	56
S4.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	62
S4-1	Policies related to consumers and end-users	154
S4-2	Processes for engaging with consumers and end-users about impacts	162
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	178
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	166
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	179
G1	BUSINESS CONDUCT	253
G1.GOV-1	The role of the administrative, supervisory and management bodies	11
G1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	71
G1-1	Business conduct policies and corporate culture	253
G1-3	Prevention and detection of corruption and bribery	260
G1-4	Incidents of corruption or bribery	268
TS	SPECIFIC TOPICS	
TS1	Sustainable Finance	181
TS2	Entrepreneurship Education	219
TS3	General framework for preparing sustainability statements	238
TS4	Disclosures regarding specific circumstances	269

ADDENDUM 2. List of Indicators Deriving from other EU Legislation

The table below includes all ESRS indicators derived from other EU legislation and specifies where the information can be found, if it has been determined to be material.

Presentation requirement and related indicator	SFDR Reference	Reference Pillar 3	Benchmarks Regulation	Reference to European Climate Law	Material/ Not material	No. pag.
ESRS 2 GOV-1 Gender diversity of the board of directors, paragraph 21 (d)	Indicator 13 in Table 1 of Annex 1		EU Commission Delegated Regulation 2020/1816, Annex II		YES	11
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21(e)			Delegated Regulation (EU) 2020/1816, Annex II		YES	11
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator 10 in Table 3 of Annex 1				YES	25
ESRS 2 SBM-1 Involvement in fossil fuel-related activities, paragraph 40(d) i	Indicator 4 in Table 1 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on environmental and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II		NO	N/A
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40(d)(ii)	Indicator 9 in Table 2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		NO	N/A

ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d)(iii)	Indicator 14 in Table 1 of Annex 1	Delegated Regulation (EU) 2020/1818, Art. 12 (1) Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS 2 SBM-1 Involvement in activities related to the cultivation and production of tobacco, paragraph 40 (d) iv		Delegated Regulation (EU) 2020/1818, Art. 12 (1) Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS E1-1 Transition Plan for Achieving Climate Neutrality by 2050, paragraph 14		Regulament UE 2021/1119, Art. 2 (1)	YES	The Group does not yet have a climate transition plan, but its development is underway, in line with the strategic direction adopted.
ESRS E1-1 Entities excluded from Paris-aligned benchmarks, paragraph 16 (g)	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Model 1: Banking Book – Climate-related transition risk: Credit quality of exposures by sector, issuance, and residual maturity	Delegated Regulation (EU) 2020/1818, Art. 12.1(d) to (g) and Art. 12.2	NO	N/A

ESRS E1-4 Greenhouse gas (GHG) emission reduction targets, paragraph 34	Indicator 4 in Table 2 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Template 3: Banking Book – Climate-related transition risk: alignment indicators	Delegated Regulation (EU) 2020/1818, Art. 6	YES	The Group has not yet established GHG reduction targets.
ESRS E1-5 Energy consumption from fossil sources, broken down by source (only for sectors with high climate impact), paragraph 38	Indicator 5 in Table 1 and Indicator 5 in Table 2 of Annex 1			NO	N/A
ESRS E1-5 Energy consumption and energy mix, paragraph 37	Indicator 5 in Table 1 of Annex 1			NO	N/A
ESRS E1-5 Energy intensity associated with activities in sectors with high climate impact, paragraphs 40–43	Indicator 6 in Table 1 of Annex 1			NO	N/A
ESRS E1-6 Gross GHG emissions for Scopes 1, 2, and 3 and total greenhouse gas emissions, paragraph 44	Indicators 1 and 2 in Table 1 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Template 1: Banking Book – Climate-related transition risk: Credit quality of exposures by sector, emissions, and residual maturity	Delegated Regulation (EU) 2020/1818, Art. 5(1), 6, and 8(1)	YES	93

ESRS E1-6 Gross greenhouse gas emissions intensity, paragraphs 53–55	Indicator 3 in Table 1 of Annex 1	Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453 Template 3: Banking Book – Climate-related transition risk: alignment indicators	Delegated Regulation (EU) 2020/1818, Art. 8 (1)	YES	94
ESRS E1-7 Elimination of greenhouse gases (GHG) and carbon credits, paragraph 56			Regulament (UE) 2021/1119, Art. 2 (1)	NO	N/A
ESRS E1-9 Exposure of the reference portfolio to physical risks related to climate change, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS E1-9 Breakdown of monetary amounts by acute and chronic physical risk, paragraph 66(a)		Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47;		NO	N/A
ESRS E1-9 Location of significant assets exposed to material physical risk, paragraph 66 (c)		Template 5: Banking Book – Physical risk related to climate change: Exposures subject to physical risk			
ESRS E1-9 Breakdown of the carrying amount of its real estate assets by energy efficiency classes, paragraph 67(c)		Article 449a of EU Regulation 575/2013; Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Banking Book - Climate-related transition risk: Loans secured by real estate - Energy efficiency of the collateral		NO	N/A

ESRS E1-9 Degree of portfolio exposure to climate change opportunities, paragraph 69		Delegated Regulation (EU) 2020/1818, Annex II	NO	N/A
ESRS E2-4 The quantity of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) released into air, water, and soil, paragraph 28	Indicator 8 in Table 1 of Annex 1 Indicator 2 in Table 2 of Annex 1 Indicator 1 in Table 2 of Annex 1 Indicator 3 in Table 2 of Annex 1		NO	N/A
ESRS E3-1 Water and marine resources, paragraph 9	Indicator 7 in Table 2 of Annex 1		NO	N/A
ESRS E3-1 Dedicated policy, paragraph 13	Indicator 8 of Table 2 of Annex 1		NO	N/A
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator 12 of Table 2 of Annex 1		NO	N/A
ESRS E3-4 Total amount of water recycled and reused, paragraph 28 (c)	Indicator 6.2 in Table 2 of Annex 1		NO	N/A
ESRS E3-4 Total water consumption in m ³ relative to net revenue from own operations, paragraph 29	Indicator 6.1 of Table 2 of Annex 1		NO	N/A
ESRS 2-SBM 3 - E4 Paragraph 16 (a) i	Indicator 7 in Table 1 of Annex 1		NO	N/A
ESRS 2-SBM 3 - E4 Paragraph 16 (b)	Indicator 10 in Table 2 of Annex 1		NO	N/A

ESRS 2-SBM 3 - E4 Paragraph 16 (c)	Indicator 14 of Table 2 of Annex 1	NO	N/A
ESRS E4-2 Practices or policies for sustainable oceans/seas, paragraph 24 (c)	Indicator 11 of Table 2 of Annex 1	NO	N/A
ESRS E4-2 Practices or policies for sustainable oceans/seas, paragraph 24 (c)	Indicator 12 of Table 2 of Annex 1	NO	N/A
ESRS E4-2 Policies to combat deforestation, paragraph 24 (d)	Indicator 15 of Table 2 of Annex 1	NO	N/A
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator 13 of Table 2 of Annex 1	NO	N/A
ESRS E5-5 Hazardous and radioactive waste, paragraph 39	Indicator 9 in Table 1 of Annex 1	NO	N/A
ESRS 2-SBM3 - S1 Risk of forced labor incidents, paragraph 14 (f)	Indicator 13 of Table 3 of Annex 1	NO	N/A
ESRS 2-SBM3 - S1 Risk of child labor incidents, paragraph 14 (g)	Indicator 12 of Table 3 of Annex 1	NO	N/A
ESRS S1-1 Human Rights Policy Commitments, paragraph 20	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1	YES	125
ESRS S1-1 Due diligence policies regarding the issues addressed by the International Labor Organization's core conventions 1–8, paragraph 21	Delegated Regulation (EU) 2020/1816, Annex II	YES	125

ESRS S1-1 Processes and measures to prevent human trafficking, paragraph 22	Indicator 11 of Table 3 of Annex 1		NO	N/A
ESRS S1-1 Workplace Accident Prevention Policy or Management System, Paragraph 23	Indicator 1 in Table 3 of Annex 1		YES	137
ESRS S1-3 Mechanisms for resolving complaints, paragraph 32 (c)	Indicator 5 of Table 3 of Annex 1		YES	145
ESRS S1-14 Number of fatalities and number and rate of occupational accidents, paragraph 88 (b) and (c)	Indicator 2 in Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	138
ESRS S1-14 Number of days lost due to injuries, accidents, deaths, or illnesses, paragraph 88(e)	Indicator 3 in Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	138
ESRS S1-16 Gender pay gap, unadjusted, paragraph 97(a)	Indicator 12 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	128
ESRS S1-16 Annual remuneration rate of the CEO, paragraph 97(b)	Indicator 8 of Table 3 of Appendix 1		YES	128
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator 7 of Table 3 of Annex 1		YES	134
ESRS S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 104 (a)	Indicator 10 in Table 1 and Indicator 14 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	YES	134

ESRS 2-SBM3 – S2 Significant risk of child labor or forced labor in the value chain, paragraph 11(b)	Indicators 12 and 13 in Table 3 of Annex 1		NO	N/A
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		NO	N/A
ESRS S2-1 Policies related to workers in the value chain, paragraph 18	Indicators 11 and 4 in Table 3 of Annex 1		NO	N/A
ESRS S2-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Indicator 10 in Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	NO	N/A
ESRS S2-1 Due diligence policies regarding the issues addressed by the fundamental conventions of the International Labor Organization 1–8, paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II	NO	N/A
ESRS S2-4 Human rights issues and incidents in the upstream and downstream value chain, paragraph 36	Indicator 14 in Table 3 of Annex 1		NO	N/A
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		NO	N/A

ESRS S3-1 Non-compliance with the UN Guiding Principles on Business and Human Rights, ILO principles, or OECD guidelines, paragraph 17	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	NO	N/A
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator 14 of Table 3 of Annex 1		NO	N/A
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator 9 in Table 3 and Indicator 11 in Table 1 of Annex 1		YES	154
ESRS S4-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Indicator 10 of Table 1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)	YES	158
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator 14 of Table 3 of Annex 1		YES	158
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator 15 of Table 3 of Annex 1		YES	254
ESRS G1-1 Protection of Whistleblowers, paragraph 10 (d)	Indicator 6 of Table 3 of Annex 1		YES	256
ESRS G1-4 Fines for violations of anti-corruption and anti-bribery legislation, paragraph 24 (a)	Indicator 17 of Table 3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II	YES	268
ESRS G1-4 Standards on Anti-Corruption and Anti-Bribery Legislation, paragraph 24(b)	Indicator 16 of Table 3 of Annex 1		YES	260

ADDENDUM 3. Management Structures at the Subsidiary Level as of December 31, 2025

The subsidiaries of BT Group are managed under a unitary system, with each having a Board of Directors appointed by the General Meeting of Shareholders or Members, as applicable. For each subsidiary, executive powers have been delegated to one or more executive officers, scaled according to the scope of each company's operations and the specific characteristics of each company.

The company's supreme governing body is the General Meeting of Shareholders or Members, which determines its strategy based on key development directions, as recorded for each entity within the scope of consolidation.

Management structures are responsible for overseeing the business conduct of each subsidiary, ensuring the integration of ethical standards, compliance frameworks, and governance principles at all operational levels. Key responsibilities include establishing and updating ethical standards and policies, aligning them with the Group's Code of Conduct, anti-corruption policies, and fair competition policies, as well as overseeing compliance with regulations and industry practices in areas such as AML, anti-bribery, and data privacy.

Each entity operates under the supervision of the ASF, the NBR, or equivalent bodies in other countries, adapting the Group's standards to sector-specific regulations. Management monitors the effectiveness of internal controls and whistleblowing mechanisms, addressing misconduct. They are also responsible for integrating ESG factors into decision-making processes, extending the Sustainability Policy across the entire group.

Business conduct is overseen through a two-tiered system: the General Shareholders' Meeting who sets out the strategic direction, while the subsidiary's management, composed of experts with diverse qualifications, ensures its implementation. The Group proactively addresses challenges through its Policy on the Suitability Assessment of Management Board Members and Group-Level Evaluation.

At the level of each subsidiary of the Group, robust mechanisms for employee representation and social dialogue have been established. Each company has a collective bargaining agreement, negotiated with elected employee representatives for a two-year term. Employee representatives, elected every two years, play a crucial role in negotiating collective agreements, ensuring fair working conditions, fair wages, and workplace safety.

Starting in 2025, the Group's Sustainability Policy has been implemented at the subsidiary level, adapted to the specific context of each entity. The Boards of Directors of the subsidiaries monitor sustainability issues and oversee the companies' operations. Advisory

committees, such as those for audit, risk management, and compensation, formulate opinions on the identified impacts, risks, and opportunities.

To manage the complexity and novelty of these issues, the subsidiaries have developed training programs for staff and management and have engaged specialized experts to provide consulting on sustainability matters. Specific measures impacting sustainability are outlined in the sections dedicated to each company.

Remuneration of Subsidiary Staff and Management

The Group's primary objective regarding compensation is to uphold the principle of fairness, considering business and risk strategies, corporate culture and values, long-term institutional interests, and measures to mitigate conflicts of interest. The fundamental principles of the Remuneration Policy include driving long-term performance, attracting and retaining the best professionals, rewarding responsibility and professional track record, and generating profit under sustainable and competitive conditions.

The Group ensures fair and competitive compensation, based on skills and performance, with two components: fixed and variable. Fixed compensation reflects professional experience and organizational responsibility, while variable compensation reflects sustainable, risk-adjusted performance, subject to an annual review. The subsidiaries have their own remuneration policies, tailored to the business, risk appetite, and complexity of each company.

BT Microfinanțare IFN S.A. (BT Mic)

The management structure at BT Mic includes:

- The supervisory body – the Board of Directors, consisting of 3 non-executive members appointed by the General Meeting of Shareholders. The Board ensures the administration and supervision of the Institution, in accordance with the prerogatives set forth in the Articles of Incorporation and applicable legislation, and
- Senior executive management, consisting of 3 executive members – the CEO, who has coordination responsibilities regarding the overall operations, and the 2 Deputy CEOs, who are directly responsible for distinct areas of the company's operations, depending on their respective areas of expertise and the company's scope of business.

The managers of the Non-Bank Financial Institution (the CEO and the Deputy CEOs) must meet the specific requirements regarding qualifications, experience, and a good reputation by the legislation applicable to non-bank financial institutions. Their appointment is made by the Board of Directors, and they must undergo the procedures prescribed by the regulations of the National Bank of Romania.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Tiberiu Moisă	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Luminița-Delia Runcan	Member of the Board of Directors	Non-Executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies.
Cristina Sindile	Member	Non-Executive	Romanian	4 years	CEO with over 22 years of experience in the financial and banking sector, specializing in strategic management, risk management, and organizational process optimization. He has led complex microfinance projects and coordinated critical operational areas. He holds advanced degrees and has completed programs that reinforce his expertise.

Composition of the Board of Directors by gender and age

The Board of Directors of BT MIC	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	1	33.3	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	1	66.7	1	33.3	3	100

× × × ×

0.67 is the gender diversity rate at the Board of Directors level.

Top Management

The company's executive management (**Directors**) are appointed by the Board of Directors and must meet the legal requirements. Namely, they must be approved by the NBR before effectively assuming their duties. Pursuant to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-bank financial institution jointly and

severally (and, with certain exceptions, individually) to exercise the powers of organizing and managing its operations.

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Valentina Alexandru	Deputy Director	Executive	Romanian	4 years	Loan specialist with over 20 years of experience in the financial sector. Possesses skills in coordinating and developing credit strategies and implementing financial strategies for microenterprises.
Marian Ene	CEO	Executive	Romanian	4 years	CEO of the Business Division with over 20 years of experience in the financial and banking sector. He possesses well-developed skills in business, marketing, and PR, as well as in coordinating the activities of the SME department.
Dan Cojocaru	Deputy Director	Executive	Romanian	4 years	Risk management specialist with over 19 years of experience in the financial sector, gained in banking institutions. His experience covers the definition and implementation of the risk management framework at the institutional level, the development of control and monitoring tools, and the coordination of compliance and corporate governance processes.

Executive management structure, by gender and age

BT MIC's executive management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	2	66.7	3	100
>50 years	0	0	0	0	0	0
Total	1	33.3	2	66.7	3	100

× × × ×

0.33 is the gender diversity rate at the executive management level.

Business conduct rules have been defined and implemented by management to reflect the institution's values, integrity, and compliance with legal requirements. BT Microfinance's ESG strategy integrates ESG principles into lending and corporate practices, promoting financial inclusion, entrepreneurship, and sustainability. ESG performance is monitored continuously, and the Institutional Development and Business Development Support Departments are responsible for implementing lending products and developing digital tools.

Company executives monitor impacts, risks, and opportunities, reporting quarterly to the Board of Directors. The General Shareholders' Meeting and the Board of Directors define the principles for conducting business in a prudent manner, ensuring an optimal internal

control system. Staff receive ongoing training, and one employee has been nominated for training in the ESG field.

OCN Microinvest SRL

The management structure at OCN Microinvest includes:

- Supervisory Body – the Company’s Board, composed of members appointed by the General Meeting of Shareholders. The Board establishes the strategy, approves primary Internal Rules of Procedure, monitors the activities of the executive body and internal divisions, and ensures the prudent management and oversight of the company’s risks, and
- Executive Management – the Administrator (General Director)*.

*In accordance with the Regulations on the Management Framework, the institution's executive body is referred to as the "Administrator (Executive Director)"

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Sabaz Mehmet Murat	Member of the Board of Directors	Non-executive	Turkish	1 year	Solid professional experience in the banking sector, gained in environments marked by rapid change and organizational transformation. He is results-oriented and collaborative, with expertise in customer relationship management, debt restructuring, risk management, and business process optimization. His work spans various segments, including retail, corporate, and SME, contributing to a deep understanding of the different dimensions of banking. Since 2024: Member of the Board of Directors of Victoriabank, serving on the Risk Management Committee and the Audit Committee; 2024–2025: Member of the Supervisory Board of BCR Chişinău; 2018–2024: Member of the Board of Directors of Victoriabank, Chair of the Compensation Committee, and member of the Risk Management Committee; Since November 2025: Member of the Board of OCN Microinvest SRL.
Luminița-Delia Runcan	Member of the Board of Directors	non-executive	Romanian	1 year	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit

					risk analysis, and internal control, playing a central role in defining and implementing risk strategies.
Khanikyan Levon	Member of the Board of Directors	non-executive	Armenian	1 year	With over 20 years of experience in financial and risk management. He specializes in building and coordinating diverse teams, with a solid academic background, including an MBA in international management and CFA certification. His work in Romania and Eastern Europe provides a practical perspective on retail and SME banking, treasury, and capital markets.
Sindile Cristina Dalia	Member of the Board of Directors	non-executive	Romanian	1 year	CEO with over 22 years of experience in the financial and banking sector, specializing in strategic management, risk management, and organizational process optimization. She has led complex microfinance projects and coordinated critical operational areas. She holds advanced degrees and has completed programs that reinforce her expertise.

Composition of the Board of Directors by gender and age

Board of Directors of OCN Microinvest	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	25	1	25	2	50
>50 years	1	25	1	25	2	50
Total	2	50	2	50	4	100

XXXX

0.50 is the gender diversity rate on the Board of Directors.

Top Management

The Executive Director is the sole executive body, responsible for managing day-to-day operations, implementing approved strategies, risk management, AML/CFT compliance, and representing the Company in its dealings with third parties. He reports periodically to the General Meeting of Shareholders and the Board and may delegate duties to subordinate units.

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Svinarenco Dumitru	CEO	Executive	Moldovan	1 year	Executive with over 22 years of experience in the banking and microfinance sector, specializing in MSME lending, risk management, and business development. He has led Microinvest since 2015, with responsibilities including strategy, coordination of the company's operations, implementation of risk policies, and relations with regulatory authorities and international financiers.

Executive management structure, by gender and age

Executive management of BT Microinvest	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	100	1	100
>50 years	0	0	0	0	0	0
Total	1	0	1	100	1	100

❖ ❖ ❖

0 is the gender diversity rate at the executive management level.

Microinvest has committees dedicated to critical areas such as credit risk, operational risk, financial risk, AML/CFT, fraud prevention, recovery, human resources, IT & projects, audit follow-up, and the ESG Committee. These committees support the decisions of the Board and the CEO, monitor risks, and approve corrective measures.

The ESG strategy is coordinated by the ESG Committee, which monitors the implementation of ESG standards, assesses social and environmental impacts, analyzes green loans, and approves measures to integrate ESG criteria into lending and risk management.

Internal control is structured around independent functions (risk, legal compliance, AML/CFT, operational risk, information security, and internal audit), and IT systems and business continuity plans ensure stable, compliant, and responsible operations in line with sustainability requirements.

BT Leasing Transilvania IFN S.A. (BT Leasing)

Given the completion of the merger by absorption with OTP Leasing România IFN S.A. on December 1, 2024, and the integration process being fully completed, the information presented for the year 2025 is reported exclusively from the perspective of the entity resulting from the merger.

BT Leasing Transilvania IFN S.A. is managed under a unitary system: the Board of Directors exercises supervisory functions, while day-to-day management is carried out by senior executive management, consisting of at least two individuals. Directors and members of management have a solid professional reputation and experience appropriate to the company's activities. The company complies with the prudential requirements of the National Bank of Romania and notifies it of relevant changes regarding management structures and governance, in accordance with applicable regulations.

The management structure at BT Leasing includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 5 executive members, one with overall coordination responsibilities for the company's entire operations, and 4 of whom directly oversee different areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the industry, products, and location of the company
Tiberiu Moisă	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Ioan Alin Nistor	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Daniel Szeleky	Independent Non-Executive Member	Non-Executive	Romanian	4 years	Executive Director of Corporate Business with over 24 years of experience in the financial and banking sector. Previously held the position of SME & Microbusiness Director, consolidating his expertise in coordinating commercial activities for clients classified as SMEs and Micro Businesses, as well as monitoring aspects related to their interaction with the financial institution. He holds a university degree and is a member of the Board of Directors at ROCA X, Ebriza Software SRL, BT Leasing, BT Mic, GapMinder VC, and BT Club, the Romanian Entrepreneurs' Club. He has also participated in numerous training courses through which he has strengthened his skills in leadership and commercial strategy, risk and portfolio management, corporate governance, and customer relationship management

Composition of the Board of Directors by gender and age

Board of Directors of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	0	0	1	33.3	1	33.3
Total	0	0	3	100	3	100

× × × ×

0 is the gender diversity rate at the Board of Directors level.

Top Management

The company's executive management (**Directors**) are appointed by the Board of Directors and must meet the legal requirements. Namely, they must be approved by the NBR before effectively assuming their duties. Pursuant to the relevant legal provisions, the Board of Directors has mandated the Directors of the non-bank financial institution jointly and severally (and, with certain exceptions, individually) to exercise the powers of organizing and managing its operations.

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Ionuț-Călin Morar	CEO	Executive	Romanian	4 years	Over 25 years of experience in the leasing industry. His professional career reflects a constant commitment to the company's strategic development, coordination of lending and risk management activities, implementation of operational policies, and representation of the company in its relations with institutional partners and third parties.
Mihai Nicolescu	Deputy Director	Executive	Romanian	4 years	Deputy CEO of Finance with over 20 years of experience in the financial sector. He is one of the four executives at BT Leasing Transilvania. He has expertise in coordinating and managing the finance, accounting, and reporting departments.
Liviu-Onuț Șerban	Deputy	Executive	Romanian	4 years	Deputy General Commercial Director with over 16 years of experience in lease financing. Possesses expertise in coordinating and auditing the activities of organizational structures, developing strategies and policies for the company's growth, and analyzing economic indicators. Academic background provides a solid foundation in financial regulations.
Corina Portase	Deputy Director	Executive	Romanian	4 years	Deputy CEO for Risk and Compliance with over 24 years of experience in the field of lease financing. He possesses expertise in representing the company, ensuring and implementing its strategy and development policy, overseeing risk

Pop Marian Rodion	Deputy Director	Executive	Romanian	4 years	management, and coordinating the activities of subordinate organizational units. Marian Rodion Pop has over 15 years of experience in finance and operations, with expertise in leasing, portfolio management, and the coordination of organizational processes. Since 2018, he has served as Chief Operations Officer at BT Leasing, responsible for planning and managing external funds, reporting to management and regulatory authorities, managing environmental risks, and digitizing operational processes.

Executive management structure by gender and age.

Executive Management of BT Leasing	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	20	4	80	5	100
>50 years	0	0	0	0	0	0
Total	1	20	4	80	5	100

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0.20 is the gender diversity rate at the executive management level.

The responsibilities for monitoring and controlling sustainability impacts, risks, and opportunities at BT Leasing are carried out by the Environmental Officer (Director of Operations) and the CEO. The company maintains a well-trained workforce, with professional development programs monitored monthly by the Board of Directors. The Board is informed monthly about impacts, risks, opportunities, and the effectiveness of the measures adopted. Risk analysis and information mapping are performed internally by the Risk Department.

BT Pensii S.A.F.P.F. SA (BT Pensii)

The management structure at BT Pensii includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 2 executive members, one with coordination responsibilities for the company's overall operations, and the other directly overseeing various areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Members of the management body (executive and non-executive) are subject to a fitness assessment and prior approval by the Financial Supervisory Authority and may assume their duties only after the FSA has issued its approval decision. The entity conducts its own

suitability assessment in advance and submits the necessary documentation to the authority, in accordance with applicable regulations.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Aurel Bernat	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Executive Director of Financial Institutions and International Relations with over 20 years of experience in the financial and banking sector. She has expertise in investment management, investor relations, and international relations. She holds a university degree, supplemented by a Doctorate (PhD) in Management.
Anca-Eugenia Crăciun	Member of the Board of Directors	Non-Executive	Romanian	4 years	Coordinating Director of Private, Premium Banking, and Retail Products with over 26 years of experience in the financial and banking sector. She possesses expertise in establishing and expanding the Private Banking network, as well as its specific products, coordinating, maintaining, and developing business relationships with existing and potential clients, and promoting and selling the Bank's products.
Cosmin Antoine Constantin Călin	Independent Non-Executive Member	Non-Executive	Romanian	4 years	Executive Director of Large Corporate Clients with over 24 years of experience in the financial and banking sector. Expertise in developing the portfolio of relationships with large corporate clients, coordinating, maintaining, and developing business relationships with existing and potential clients, as well as coordinating and organizing numerous departments.

Composition of the Board of Directors by gender and age

Board of Directors of BT Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.30	0	0	1	33.30
Total	1	33.3	2	66.7	3	100

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0.33 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Dana Corina Benea	Deputy CEO	Executive	Romanian	4 years	Over 13 years of experience in private pension administration. She holds dual degrees in mechanical engineering and economics, which combine analytical thinking regarding financial processes and risk management.
Ionuț Florentin Stroe	Chief Executive Officer	Executive	Romanian	4 years	Over 15 years of experience in the banking sector and pension fund management. He has expertise in coordinating marketing and sales departments, as well as in promoting and selling banking products. Also holds a college degree that reinforces the skills acquired.

Executive management structure, by gender and age

Executive management of BT Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	50	1	50
>50 years	1	50	0	0	0	50
Total	1	50	1	50	2	100

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0.50 is the gender diversity rate at the executive management level.

The Board of Directors oversees sustainability impacts, risks, and opportunities, while effective management is carried out by the Directors. They may propose the establishment of committees to manage critical issues. Employee programs are diverse, tailored to the company's needs and the employees' potential.

The management structures, the Board of Directors and the Executive Directors, ensure an adequate internal control framework. The Internal Audit Department establishes and maintains an audit plan, assessing the effectiveness and adequacy of risk management, internal control, investments, and marketing. Internal control and risk management represent the second level of control, ensuring compliance with legal prudential obligations and the management of sustainability issues.

BT Asset Management S.A.I. SA (BTAM)

The management structure at BT Asset Management includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 3 executive members, one with coordination responsibilities for the company's overall operations, and 2 of whom directly oversee different areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Members of the management structure (executive and non-executive) are subject to a suitability assessment and prior approval by the Financial Supervisory Authority, and the exercise of their mandate is possible only after the FSA issues its approval decision. The entity conducts its own suitability assessment and submits the necessary documentation to the authority, in accordance with applicable regulations. Due to the complexity of the company's regulatory and operational framework, the Board of Directors is responsible for overseeing sustainability-related impacts, risks, and opportunities pertaining to BTAM.

Board of Directors

Member Name	Position	Member Type	Nationality	Length of the assignment	Relevance of experience to the industry, products, and company location
Luminița-Delia Runcan	Chair of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies.
Aurel Bernat	Member of the Board of Directors	Non-Executive	Romanian	4 years	Executive Director of Financial Institutions and International Relations with over 20 years of experience in the banking sector. Possesses solid expertise in investment management, investor relations, and international relations. Holds a higher education degree, complemented by a PhD in management.
Oana Ilaș	Member of the Board of Directors	Non-Executive	Romanian	4 years	Relevant experience as per CV, available here.

Composition of the Board of Directors, by gender and age

BTAM Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	1	33.3	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	2	66.7	1	33.3	3	100

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0.67 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Dan Dascăl	Chief Executive Officer	Executive	Romanian	4 years	Chief Executive Officer with over 25 years of experience in the capital markets. He joined the Banca Transilvania Group in 2002, overseeing asset analysis and management activities. He has expertise in portfolio management, financial analysis, and fund management.
Călin Condor	Deputy CEO	Executive	Romanian	4 years	Deputy CEO with over 29 years of experience within the Banca Transilvania Group and in the financial sector. He also holds two postgraduate degrees in Business Administration and Banking and Capital Markets.
Irimiea Victor Tudor	Deputy CEO	Executive	Romanian	4 years	Tudor Irimiea has over 15 years of experience in the capital markets, investments, and commercial management. Since 2022, he has been coordinating marketing and sales activities at BT Asset Management, with responsibilities in developing the commercial strategy and increasing market share.

Executive management structure, by gender and age

BTAM's executive management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	33.3	1	33.3
>50 years	0	0	2	66.7	2	66.7
Total	0	0	3	100	3	100

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0 is the gender diversity rate at the executive management level.

The Board of Directors sets the company's development directions, and the executive management implements the measures decided upon. BTAM's governance system ensures proper, efficient, and prudent management in accordance with legal regulations. The organizational structure is designed to best serve the interests of the investors in the managed funds.

Internal control lines include risk management and compliance, and control at the parent company level verifies adherence to Group standards. The availability of the skills necessary for sustainability oversight is valued at all hierarchical levels. Management structures promote diversity and ensure continuous professional development, adhering to principles of ethics and conduct.

The compensation policy is reviewed by the Compensation and Nomination Committee and approved by the Board of Directors. The General Shareholders' Meeting provides strategic leadership, setting organizational objectives and allocating the necessary resources. The principles of conduct include moral integrity, professionalism, transparency, compliance with the law, confidentiality, prevention of corruption, social responsibility, and avoidance of conflicts of interest.

BT Capital Partners S.A. (BTCP)

The management structure at BT Capital Partners includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 4 executive members, one with coordination responsibilities for the company's overall operations, and 3 of whom directly oversee different areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

The entire management of the entity, whether executive or non-executive, must be authorized by the ASF. Thus, regardless of the body appointing the members of the management team (the general meeting of shareholders or the board of directors), each of them must pass the suitability assessment conducted by the authority before assuming their mandate.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Costel Lionăchescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in the financial, banking, and investment sectors, with a solid track record in the management and administration of financial institutions. He has held top management positions, with expertise in corporate governance, strategy, financial restructuring, and investor relations. His work spans both the banking sector and the capital markets.
Ömer Tetik	Member of the Board of Directors	non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Leontin Toderici	Member of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here

Composition of the Board of Directors by gender and age

The Board of Directors of BTCP	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	0	0	0	0
>50 years	0	0	3	100	3	100
Total	0	0	3	100	3	100

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0 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Daniela Secară	CEO	Executive	Romanian	4 years	Relevant experience as per CV, available here.
Mihai Milchiş	Deputy CEO	Executive	Romanian	4 years	Deputy CEO for Finance, has over 19 years of experience in the capital market. She has been a tax consultant since 2007 and is a member of the Chamber of Tax

					Consultants, holding a bachelor's degree in economics from Babeş-Bolyai University, specializing in Business Management.
Mirela-Lenuța Buduroiu	Deputy CEO	Executive	Romanian	4 years	Deputy CEO for Risk, has 20 years of experience in the capital market, holding leadership and risk management positions at BTCP and SSIF Target Capital. She holds multiple certifications in financial risk and has a bachelor's degree in economics from the Bucharest Academy of Economic Studies (ASE), specializing in Economic Planning and Cybernetics.
Vlad Pintiile	Deputy CEO	Executive	Romanian	4 years	Deputy CEO of Trading, has over 14 years of experience in the capital market, having held management and financial analysis positions at BTCP and NBG Securities, and holds degrees from ASE, City University, and the Bucharest International School of Management.

Executive management structure, by gender and age

BTCP Executive Management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	25	2	50	3	75
>50 years	1	25	0	0	1	25
Total	2	50	2	50	4	100

✖ ✖ ✖ ✖

0.5 is the gender diversity rate at the executive management level.

The Board of Directors implements the company's strategy approved by the general meeting, and executive management implements the necessary measures. Oversight of sustainability impacts, risks, and opportunities is ensured by the Board of Directors and advisory committees. BTCP collaborates with the ESG Integration & IR Department to update the internal framework and appoints a sustainability officer who participates in ongoing training programs.

Compensation policies do not create incentives that favor self-interest at the expense of clients. BTCP develops sustainability policies and procedures, integrating sustainability risks and issues into day-to-day operations. Sustainability information is published on its website to inform investors.

BTCP analyzes the quality of ESG information from issuers to assess and monitor the environmental and social characteristics of investments. It periodically reassesses the situation and intends to consider the negative effects of investment decisions on sustainability factors. The findings of the risk assessment are integrated into new procedures and policies. Information is provided during executive management meetings whenever necessary.

BT Direct IFN S.A. (BT Direct)

The management structure at BT Direct includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, consisting of 3 executive members.

Board of Directors

Member Name	Position	Member type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Gabriela Nistor	Chair of the Board of Directors	Non-executive	Romanian	4 years	Gabriela Nistor has nearly 30 years of experience in the banking sector, holding key roles in the development and digitalisation of Banca Transilvania, as well as in the transformation of Idea:Bank into Salt Bank, a project she led between 2022 and 2025. Her professional activity is distinguished by strategic leadership, the development of banking products, and the implementation of major digital modernisation initiatives.
Florentina Virginia Mircea	Member of the Board of Directors	Independent non-executive	Romanian	4 years	With over 21 years of experience in the financial sector, having held leadership positions such as Executive Director at TBI Bank EAD Sofia for 9 years and country-level executive roles at TBIF Financial Services for over 14 years, with expertise in banking management, strategic planning, and business development
Oana Ilaș	Member of the Board of Directors	Independent Non-Executive	Romanian	4 years	Relevant experience as per CV, available here.

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0.67% of the members of the Board of Directors are independent.

Composition of the Board of Directors by gender and age

The Board of Directors of BT Direct	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.3	0	0	1	33.3
>50 years	2	66.7	0	0	2	66.7
Total	3	100	0	0	3	100

XXXX

0 is the gender diversity rate at the Board of Directors level

Top Management

Members of the company's management with executive responsibilities (Directors), appointed by decision of the Board of Directors from among its directors, are subject to prior approval by the National Bank of Romania, for the purpose of confirming the competence and integrity necessary to exercise leadership and management responsibilities in the provision of payment services. This procedure supports BT Direct's commitment to sound principles of governance, transparency, and compliance, contributing to the maintenance of a secure, ethical, and regulatory-compliant operational framework.

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Nicoleta Bott	CEO	Executive	Romanian	4 years	With over 21 years of experience in the financial industry, progressing from operational and back-office roles to top management positions, she is currently CEO at BT Direct IFN SA, with expertise in operational, administrative, and strategic management.
Gabriel Gogu	Deputy CEO	Executive	Romanian	4 years	With over 29 years of experience in financial management and risk management, he has held strategic leadership positions in the banking and financial sector. Currently, Deputy CEO for Risk at BT Direct IFN SA, where she coordinates the company's risk management divisions. For 16 years, she served as CEO of BT Direct and CEO at RALFI S.A.
Iuliana Puhalschi	Deputy CEO	Executive	Romanian	4 years	Deputy CEO, Finance, with over 19 years of experience in the financial and economic

sector. Expertise in managing tax-related activities and ensuring timely reporting to the relevant authorities, maintaining contact with other financial institutions, coordinating internal and external audits and tax inspections, economic strategy, and process optimization. In her current position, she oversees the finance, reporting, and data management departments. She holds a bachelor's degree in economics, supplemented by a master's degree and an Executive MBA. She is also a member of ACCA and CECCAR.

Executive management structure, by gender and age

BT Direct's executive management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	2	66.7	0	0	2	66.7
>50 years	0	0	1	33.3	1	33.3
Total	2	66.7	1	33.3	3	100

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0.67 is the gender diversity rate at the executive management level

BT Direct's customer portfolio focuses on individuals, including personal loans and card products, in line with the company's business scope and operational structure . At the organizational level, BTD has a dedicated sustainability role, the ESG Governance and Risk Specialist, who works within the Risk Control and Management Division, reporting to the Deputy CEO for Risk, with responsibilities for analyzing/monitoring risks and coordinating internal/external/BT Group reporting in the ESG area.

The Board of Directors sets the objectives/strategy, approves the risk management framework, and exercises oversight over executive management, with the ability to delegate responsibilities within legal limits. The Risk Management Committee advises the Board of Directors on strategy and risk appetite, oversees implementation, develops procedures, and reports to the Board at least quarterly. Its scope also includes sustainability risks.

Internal audit is conducted internally or through the parent company's specialized department, in accordance with applicable regulations.

Currently, sustainability risks are considered insignificant, given the nature of the business (loans to individuals in Romania) and the operational profile. BTD monitors climate risks

(physical/transition) and aligns with the Group's policies. BTD contributes to the Group's consolidated reporting (including carbon footprint, Scope 1/2/3).

Improvement Credit Collection S.R.L. (ICC)

Board of Directors

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Bogdan Pleşuvescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available_here.
Luminița-Delia Runcan	Member of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies
George Călinescu	Member of the Board of Directors	Non-Executive	Romanian	4 years	Relevant experience as per CV, available_here

Composition of the Board of Directors, by gender and age

ICC Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	1	33.3	2	66.7	3	100

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0.33 is the gender diversity rate on the Board of Directors

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Paul Țupa	Chief Executive Officer	Executive	Romanian	4 years	27 years of experience in the financial and banking sector.

Ștefan-Dan Dragomir	Deputy CEO	Executive	Romanian	4 years	24 years of experience in the financial and banking sector.

Executive management structure, by gender and age

ICC Executive Management	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	50	1	50
>50 years	0	0	1	50	1	50
Total	0	0	2	100	2	100

✖ ✖ ✖ ✖

0 is the gender diversity rate at the executive management level.

The Board of Directors oversees and manages the company's operations, while day-to-day management is delegated to the Chief Executive Officer and the Deputy Chief Executive Officer. The Board of Directors meets at least once a month, and executive management ensures the reporting and communication framework necessary for the implementation of approved strategies and policies. The main aspects of the company's risk management and internal control framework are represented by the three-line control system, operational risk management, the compliance and internal audit functions, and anti-fraud and information security activities, supplemented by the internal audit function organized at the BT Group level. The assessment and monitoring of these risks and related controls are carried out at all organizational levels, in accordance with the internal procedural framework.

ICC applies a compensation policy aligned with the business strategy and prudent risk management, without encouraging excessive risk-taking. The principles include long-term performance, attraction and retention, accountability, professional track record, profitability, transparency, and customer interests. Variable remuneration is granted based on individual and collective performance, taking into account the risks assumed and the company's results. Independent control functions receive predominantly fixed remuneration. The roles and responsibilities of the Board of Directors and the Chief Executive Officer include approving, monitoring, and verifying the sustainability of the variable remuneration package from a prudential perspective.

With regard to business conduct, the provisions of the Code of Ethics and Conduct applicable at the BT Group level are applicable within ICC. Additionally, the Procedure on Know Your Customer, the Prevention and Combating of Money Laundering and Terrorist Financing, as well as the Fraud Risk Management Policy, apply. ICC employees participate in regular training sessions organized by the BT Academy.

BT Leasing Moldova S.R.L. (BT Leasing MD)

The management structure at BT Leasing Moldova includes:

- The governing body with supervisory functions is the General Meeting of Shareholders, which manages the company through the Board of Directors, consisting of 4 non-executive members;
- Senior executive management is provided by the administrator, the General Director, who serves as the sole executive body and coordinates the company's entire operations.

Board of Directors

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Bogdan Pleşuvescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	Relevant experience as per CV, available here.
Ionuț-Călin Morar	Member of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in the leasing sector Her professional career reflects a consistent commitment to the company's strategic development, the coordination of credit and risk management activities, the implementation of operational policies, and the representation of the company in its relations with institutional partners and third parties.

Composition of the Board of Directors by gender and age

Board of Directors of BT Leasing MD	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	0	100	2	100
>50 years	0	0	0	0	0	0
Total	0	0	0	100	2	100

XXXX

0 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member type	Nationality	Term of office	Relevance of experience to the industry, products, and company location
Marius-Călin Crăciunaș	Chief Executive Officer	Executive	Romanian	indefinite	More than 20 years of experience in the financial and banking sector.

Given that executive responsibilities are assigned to a single person, the diversity indicators applicable to the management body are not relevant to the current governance structure.

The management structure of O.C.N. BT Leasing MD S.R.L. provides a solid framework for administration and supervision, which supports the institution's vision of operating in a prudent, responsible, and efficient manner. Through the clear distribution of decision-making roles and robust internal control mechanisms, management ensures the necessary conditions for the integration of sustainable governance and for conducting business in accordance with the principles of transparency, compliance, and long-term development.

BT Broker de Asigurări S.R.L. (BT Broker)

The management structure at BT Broker de Asigurări SRL includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- senior executive management, exercised by the CEO (authorized by the ASF) and the Deputy CEO, as well as by division and department heads, within the limits of their delegated authority.

At the same time, the management structure is responsible for identifying, assessing, and managing the significant risks associated with the company's operations, ensuring a robust internal control framework that complies with ASF requirements, so that strategic and operational decisions are made in a prudent and well-founded manner.

Board of Directors

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Bogdan Pleșuvescu	Chairman of the Board of Directors	Non-executive	Romanian	4 years	<u>Relevant experience as per CV, available here.</u>
Luminița-Delia Runcan	Member of the Board of Directors	Non-executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in

					defining and implementing risk strategies.
Ionuț-Călin Morar	Member of the Board of Directors	Non-Executive	Romanian	4 years	Over 25 years of experience in the leasing sector. Her professional career reflects a consistent commitment to the company's strategic development, coordination of lending and risk management activities, implementation of operational policies, and representation of the company in relations with institutional partners and third parties.

Board of Directors Structure, by Gender and Age

Executive Management of BT Broker de Asigurare	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	1	33.3
Total	1	33.3	2	66.7	3	100

❖❖❖❖

0.33 is the gender diversity rate at the Board of Directors level

Top Management

Name	Position	Member type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Coroiu Valentin	CEO	Executive	Romanian	4 years	Over 20 years of experience in the insurance industry, holding leadership roles throughout his career. He has coordinated sales, underwriting, claims, operations, risk, compliance, and internal control activities, with extensive expertise in strategic and operational management.
Laura Cheșa	Deputy CEO	Executive	Romanian	4 years	Over 25 years of experience in the insurance sector. Skilled in negotiating employment contracts, developing the insurance portfolio, as well as in cooperating with insurance companies and preparing reports for auditors and shareholders.

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0.50 is the gender diversity rate at the executive management level.

Salt Bank

The management structure at Salt Bank includes:

- The Board of Directors, which sets Salt Bank's strategic direction and oversees the implementation of policies, including those related to sustainability. The Board ensures that the bank operates within a robust governance framework, with transparent and efficient processes, effective internal controls, and responsible risk management, including ESG risks.
- The Executive Management Committee, the bank's executive body, consists of the CEO and Deputy CEOs.

Board of Directors

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Ivo Gueorguiev	Chairman of the Board of Directors	Independent non-executive	Bulgarian, British	4 years	<u>Relevant</u> experience as per CV, available here
Costel Lionachescu	Member of the Board of Directors	Independent non-executive	Romanian	4 years	Over 25 years of experience in the financial, banking, and investment sectors, with a solid track record in the management and administration of financial institutions. He has held top management roles, with expertise in corporate governance, strategy, financial restructuring, and investor relations. His work spans both the banking sector and the capital markets.
Ömer Tetik	Member of the Board of Directors	Non-executive	Romanian	4 years	<u>Relevant</u> experience as per CV, available here
Gabriela Nistor	Member of the Board of Directors	Non-Executive	Romanian	4 years	Gabriela Nistor has nearly 30 years of experience in the banking sector, holding key roles in the development and digitalisation of Banca Transilvania, as well as in the transformation of Idea::Bank into Salt Bank, a project she led between 2022 and 2025. Her professional activity is distinguished by strategic leadership, the development of banking products, and the implementation of major digital modernisation initiatives.

Luminița-Delia Runcan	Member of the Board of Directors	Non-Executive	Romanian	4 years	Over 25 years of experience in banking management, risk management, compliance, anti-fraud, and treasury. She has coordinated the areas of risk, compliance, security, anti-fraud, credit risk analysis, and internal control, playing a central role in defining and implementing risk strategies

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40% of the members of the Board of Directors are independent.

Composition of the Board of Directors by gender and age

Salt Bank Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
30–50 years	0	0	0	0	0	<u>0</u>
>50 years	2	40	3	60	5	100
Total	<u>2</u>	40	<u>3</u>	60	<u>5</u>	100

XXXX

0.4 is the gender diversity rate at the Board of Directors level.

The Steering Committee, the bank's executive body, organizes and coordinates day-to-day operations, implementing the strategy approved by the Board of Directors. The Steering Committee integrates ESG principles into operational processes, risk management, organizational culture, and the development of products and services.

Steering Committee

Name	Position	Member Type	Nationality	Term	Relevance of experience to the company's industry, products, and location
Gabriela Nistor	CEO	Executive	Romanian	3 years	Gabriela Nistor has nearly 30 years of experience in the banking sector, holding key roles in the development and digitalisation of Banca Transilvania, as well as in the transformation of Idea::Bank into Salt Bank, a project she led between 2022 and 2025. Her professional activity is distinguished by strategic leadership, the development of banking products, and the implementation of major digital modernisation initiatives.
Sorin Dumitrescu	Deputy CEO	Executive	Romanian	4 years	Sorin Dumitrescu has over 20 years of experience in the banking sector,

					specializing in risk management, internal control, and the coordination of operational structures. He has held leadership positions at institutions such as Credit Europe Bank and Techventures Bank, directly managing areas such as risk management, compliance, anti-fraud, lending, and legal affairs.
Sinan Kircali	Deputy CEO	Executive	Turkish	4 years	Sinan Kircali has over 30 years of experience in the banking sector, having held leadership roles in operations, risk, IT, and support functions. He has held executive positions in Romania, Turkey, Bulgaria, and Malta, where he was responsible for coordinating operational activities, implementing business and IT strategies, and managing post-merger processes.
Robert Anghel	Deputy CEO	Executive	Romanian	4 years	Robert Mihai Anghel has over 20 years of industry experience, with solid expertise in strategy, digitalization, and banking product development. He has led major digital transformation projects internationally. His experience spans business strategy, digital channel development, and business process optimization.
Vikram Tikoo	Deputy CEO	Executive	British	4 years	Over 20 years of international experience in technology, digital transformation, and the management of global payment platforms. He has held senior management roles at corporations such as Fiserv and American Express. He has led technology modernization strategies, product development, and compliance programs across more than 20 international markets.

Board of Directors composition by gender and age

Board of Directors of	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
30–50 years	0	0	3	60	3	60
>50 years	1	20	1	20	2	40
Total	1	20	4	80	5	100

XXXX

0.20 is the gender diversity rate at the Board of Directors level.

Through its organizational structure, Salt Bank consistently integrates ESG principles into all critical management functions. The independent control functions, Risk Management, Compliance, and Internal Audit, play an essential role in the Governance component, ensuring a robust framework for oversight, assessment, and reporting. These structures monitor relevant risks (compliance, reputational, legal, conduct, ESG, and ICT - IT & Communications), assess the effectiveness of internal processes, and ensure compliance with European and national regulations.

Together, the oversight exercised by the Board of Directors, the coordination of the Steering Committee, and the work of independent and specialized functions create a modern, ethical, and sustainability-oriented governance ecosystem that promotes transparency, accountability, and alignment with European best practices in the ESG field.

Victoriabank

Governance Structures at Victoriabank

At Victoriabank, the General Meeting of Shareholders (GMS) is the Bank’s supreme authority. Resolutions adopted by the GMS are binding on all shareholders and the Bank’s management bodies.

The organization, operation, and powers of the GMS are established by the Law on Joint-Stock Companies, the Bank’s Articles of Association, and the Regulations of the General Meeting of Shareholders.

The Bank’s management bodies are: the Board of Directors (BoD) and the Executive Committee (EC).

The Board of Directors (BoD) is the governing body responsible for overseeing and monitoring the decision-making process and is accountable for the Bank’s overall operations and financial soundness. The BoD oversees the activities of the executive body, monitoring its actions to ensure they align with the Bank’s strategy and policies.

Members of the Board of Directors

Name	Position	Type of Member	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Thomas Grasse	Chairman of the Board of Directors	Non-executive, independent	German	4 years	Relevant experience as per CV, available here
Mehmet Murat Sabaz	Member of the Board of Directors	Non-executive, independent	Turkish	4 years	Solid professional experience in the banking sector, gained in environments marked by rapid change and organizational transformation. He is results-oriented and collaborative, with expertise in customer relationship management, debt restructuring, risk management, and business process

optimization. His work spans various segments, including retail, corporate, and SME, contributing to a strong understanding of the different dimensions of banking.

Since 2024: Member of the Board of Directors of Victoriabank, serving on the Risk Management Committee and the Audit Committee;

2024–2025: Member of the Supervisory Board of BCR Chişinău;

2018–2024: Member of the Board of Directors of Victoriabank, Chair of the Compensation Committee, and member of the Risk Management Committee;

Since November 2025: Member of the Board of OCN Microinvest SRL.

Tiberiu Moisă	Member of the Board of Directors	Non-Executive,	Romanian	4 years	Relevant experience, as per CV available here
Peter Franklin Morris	Member of the Board of Directors	Non-executive, independent	British	4 years	Peter Franklin has over 40 years of experience in the financial services industry, with solid expertise in corporate and retail banking. Throughout his career, he has held key positions in corporate treasury, finance, and client relationship management at renowned institutions such as HSBC, Chase Manhattan, ANZ, and General Electric. He has also served on supervisory boards and executive committees, contributing to the strategic development of the organizations in which he has been involved.
Ludmila Costin	Member of the Board of Directors	Non-Executive, Independent	Moldovan	4 years	Ludmila Costin is a professional with over 24 years of experience in the insurance and consulting sectors, possessing solid expertise in the business environments of Moldova and Romania. Her career includes leadership roles at companies such as PwC and Grant Thornton, as well as work as an independent consultant. She specializes in compliance with financial crime regulations, internal control, and risk management.
Turcan Victor	Member of the Board of Directors	Non-Executive	Moldovan	4 years	Founder of BC "Victoriabank" S.A., the first commercial bank in the Republic of Moldova. Over the years, he has held several leadership positions within the institution, actively contributing to its development and consolidation. Following Victoriabank's integration into the BT Financial Group in 2018, he was re-elected as Chairman of the Board of Directors, a position he held until January 2024. August 2024: Member and Vice-Chairman of the Board of Directors (approved by the

					NBM in March 2025), Chairman of the Nomination and Governance Committee; 1993 – January 2024: Various positions within the Bank's senior management, including a long tenure as Chairman of the Board of Directors.
Russell Henry Emanuel	Member of the Board of Directors	Non-Executive	British	4 years	Extensive experience in the investment field, with a career focused on Eastern Europe and Asia. His work focuses on project financing, lending, and equity investments in the private and public sectors. He has held senior positions at leading international financial institutions. Since August 2024: Elected member of the Board of Directors of Victoriabank, subject to approval by the National Bank of Moldova; member of the Risk Management Committee and the Nomination Committee; 2021–2025: Chair of the Investment Committee and the Foreign Exchange Committee at the European Fund for Southeast Europe; 2021–present: Member of the Supervisory Board at Union Bank, Albania; 2010–2021: Director for the Western Balkans, Belarus, Moldova, and Ukraine at the EBRD.

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57% of the members of the Board of Directors are independent.

Composition of the Board of Directors by gender and age

Victoriabank Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	1	14.3	1	14.3
>50 years	0	0	6	85.7	6	85.7
Total	0	0	7	100	7	100

XXXX

0% is the gender diversity rate on the Board of Directors.

The Steering Committee is the Bank's executive body, which organizes, directs, and is responsible for day-to-day operations, manages the Bank's activities efficiently and prudently in accordance with the strategy and governance framework approved by the Board of Directors, and exercises its powers under the Board's supervision.

Members of the Steering Committee

Name	Position	Type of Member	Nationality	Term	Relevance of experience to the industry, products, and company location
Levon Khanikyan	President	Executive	Armenian	4 years	With over 20 years of experience in financial and risk management. He specializes in building and leading diverse teams, backed by a strong academic background, including an MBA in International Management and CFA certification. His work in Romania and Eastern Europe provides a practical perspective on retail and SME banking, treasury, and capital markets. He has led complex projects in the retail, SME, corporate, and capital markets sectors, contributing to the operational and digital transformation of the institutions with which he has collaborated. He joined Victoriabank in 2023, playing a key role in the bank's strategic development.
Donica Vasile	Vice President	Executive	Moldovan	4 years	An executive director with extensive experience. During her tenure as an executive director at Victoriabank, she oversaw key business lines, including retail, SMEs, and corporate banking. Under her leadership, the bank saw growth in loans, deposits, and market share.
Elena-Ionela Maloş	Vice President	Executive	Romanian	4 years	With experience in planning and coordinating banking operations, specializing in cash management, foreign currency payments, and loan processing, ensuring compliance with Internal Rules of Procedure and financial legislation. She is actively involved in the Bank's digital transformation, contributing to projects such as Digital Onboarding, the MIA service, and the mobile app update. Since 2021, she has been coordinating the Bank's operations, making a significant contribution to the digitalization of processes.
Vitalie Corniciuc	Executive Vice President	Executive	Moldovan	4 years	With expertise in auditing, IFRS 9, and international auditing standards. At the Bank, he oversees accounting, financial reporting, budgeting, and financial analysis activities. Her achievements

					include the development and implementation of a project to restructure the financial and accounting departments at CB Victoriabank SA, aligning these functions with the Banca Transilvania model.
Mircea Aursulesei	Executive Vice President	Executive	Romanian	4 years	Since the beginning of his career at the bank, Mircea Aursulesei has managed the branch network, which includes 25 branches and 42 agencies. He has experience in developing banking products for retail and SME clients, contributing to the improvement of operations in these business segments. He has experience in developing the service network and banking products, both in Romania and in the Republic of Moldova.
Popa Bogdan-Dumitru	Vice President	Executive	Romanian	4 years	Mr. Bogdan Popa has substantial experience in risk management, demonstrated through his work in implementing and overseeing complex frameworks such as Basel III, IFRS 9, and operational risk assessment.

Composition of the Board of Directors by gender and age

Victoriabank's Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	16.7	5	83.3	6	100
>50 years	0	0	0	0	0	0
Total	1	16.7	5	83.3	6	100

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16.7% is the gender diversity rate on the Board of Directors.

The Bank integrates sustainability principles into its operations through an ESG Coordinator, who is responsible for coordinating environmental, social, and governance initiatives across the entire organization. This person monitors the implementation of ESG reporting requirements, supports the integration of sustainability criteria into operational and risk management processes, and ensures collaboration with relevant internal structures to align with regulatory standards and best practices in the field. ESG risk analysis is also included in the lending process for corporate clients, with a dedicated opinion issued to assess the potential impact on the bank and on transactions.

At the same time, operational sustainability is reinforced through the Bank's control and continuity mechanisms, such as the Business Continuity Committee, which manages the Business Continuity Management System, and the Crisis Management Committee, responsible for activating the recovery plan and coordinating necessary measures in unforeseen situations. These structures contribute to maintaining operational resilience and the Bank's ability to respond effectively to risks and disruptive events.

INNO Investments

The management structure at INNO Investments SAI SA includes:

- the supervisory body, the Supervisory Board, consisting of 3 independent non-executive members, and
- senior executive management, consisting of 3 executive members, one with coordination responsibilities for the entire business, and 2 of these having direct oversight of various areas of the company's operations, depending on their respective competencies and the company's scope of business.

Members of the management structure (executive and non-executive) are subject to a suitability assessment and prior approval by the Financial Supervisory Authority, and the exercise of their mandate is possible only after the FSA issues its approval decision.

Members of the Supervisory Board

Name	Position	Member Type	Nationality	Term Office	of Relevance of experience to the company's industry, products, and location
Cătălin Ioan Caragea	Chairman	Non-executive	Romanian	4 years	Relevant experience as per CV, available here .
Diana Ioana Mazurchievici	Member	Non-executive	Romanian	4 years	Over 15 years of solid experience in the financial sector, with expertise in ESG, sustainability reporting, investor relations, and mergers and acquisitions. Held leadership roles at Banca Transilvania and previously in financial auditing, overseeing non-financial reporting, complex due diligence processes, and interactions with institutional investors and regulatory authorities.
Corina Elena Stoica	Member	Non-executive	Romanian	4 years	Over 20 years of experience in the financial-banking sector and the capital market, with solid expertise in private banking, fund management, private pensions, treasury, and investments. Her expertise covers both strategic and operational areas, as well as product development, customer relationship management, and market analysis.

Supervisory Board	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	33.33%	1	33.33%	2	66.67%
>50 years	1	33.33%	0	00	1	33.33%
Total	2	66.67%	1	33.33%	3	100%

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66.67% is the gender diversity rate at the Supervisory Board level

Members of Senior Management

Name	Position	Member Type	Nationality	Term	Relevance of experience to the industry, products, and company location
Vlad Teodor Micu	CEO & President	Executive	Romanian	4 years	Over 25 years of experience in the banking sector, with a focus on corporate banking, investment banking, and distressed credit management. He has held executive leadership positions at major banking institutions, coordinating financing, reorganization, and remediation strategies for corporate clients.
Adrian Anghel	Deputy CEO	Executive	Romanian	4 years	With over 18 years of experience in asset management, Adrian has solid expertise in fund sales. His professional career includes approximately 18 years spent in various key positions in capital markets and investor relations, as well as in diversifying distribution channels and developing the product range, including their market positioning. He is a graduate of the Faculty of Finance, Insurance, Banking, and Stock Exchanges at the Bucharest Academy of Economic Studies.
Dragoş Gabriel Manolescu	Deputy CEO	Executive	Romanian	4 years	Executive with in-depth knowledge acquired through specialized programs in the financial field, including CFA certification and a master's degree in international project management from the Bucharest Academy of Economic Studies. Has approximately 18 years of professional experience in the capital markets sector, gained at several investment management firms and banking institutions, with expertise focused on fixed-income and listed equity portfolios.

Senior Executive Management Structure, by Gender and Age

Executive Committee	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.67%	2	66.67%
>50 years	0	0	1	33.33%	1	33.33%
Total	0	0	3	100%	3	100.00%

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0% is the gender diversity rate at the Senior Executive Management level.

BRD S.A.F.P.P. SA (BRD Pensii)

BRD Societate de Administrare a Fondurilor de Pensii Private S.A. was acquired by Banca Transilvania and BT Investments S.R.L. on November 28, 2025

The management structure at BRD Pensii includes:

- the supervisory body, the Board of Directors, consisting of 3 non-executive members, and
- the executive management, consisting of two executive members, one with coordination responsibilities for the company's overall operations, and the other directly overseeing various areas of the company's operations, depending on their respective responsibilities and the company's scope of business.

Members of the management structure (executive and non-executive) are subject to a suitability assessment and prior approval by the Financial Supervisory Authority, and the exercise of their mandate is possible only after the FSA issues its approval decision. The entity conducts its own suitability assessment in advance and submits the necessary documentation to the authority, in accordance with applicable regulations.

Board of Directors

Member Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the company's industry, products, and location
Anca Eugenia Crăciun	Chair of the Board of Directors	Non-executive	Romanian	4 years	Managing Director of Private, Premium Banking, and Retail Products, with over 26 years of experience in the financial and banking sector. He has expertise in establishing and expanding the Private Banking network and its specific products,

					coordinating, maintaining, and developing business relationships with existing and potential clients, as well as promoting and selling the Bank's products.
Bogdan-Lucian Duma	Member of the Board of Directors	non-executive	Romanian	4 years	Deputy Director of Corporate Governance and Legal Affairs for Subsidiaries, with over 15 years of experience in the financial, banking, and investment sectors. He possesses solid expertise in coordinating corporate governance at the group level, ensuring the legal framework for subsidiaries, and managing relations with regulatory authorities.
Mihai Stelian Rotaru	Member of the Board of Directors	Non-Executive	Romanian	4 years	Head of the Legal Department, with over 18 years of experience in the financial and banking legal field, both in credit institutions and in complex transformation and M&A projects. She possesses solid expertise in coordinating corporate, retail, and litigation legal structures, as well as in managing strategic projects at the group level, and is actively involved in the development of the legal profession.

Composition of the Board of Directors by gender and age

BRD Pensii Board of Directors	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	0	0	2	66.7	2	66.7
>50 years	1	33.3	0	0	0	0
Total	1	33.3	2	66.7	3	100

✖ ✖ ✖ ✖

0.33 is the gender diversity rate at the Board of Directors level.

Top Management

Name	Position	Member Type	Nationality	Term of Office	Relevance of experience to the industry, products, and company location
Corina Mădălina Cojocaru	CEO	Executive	Romanian	4 years	Over 18 years of experience in investment management and private pension funds. She possesses solid expertise in strategic organizational leadership, implementing governance and compliance frameworks, and managing relationships with regulatory authorities, leading complex transformation, digitalization, and risk management processes.
Mihail-Dan Nicu	Executive Director	Executive	Romanian	4 years	Over 30 years of experience in investment management, pension funds, and the capital market. He has held top management positions

at SAI BRD Asset Management, including CEO and Chairman of the Board of Directors, overseeing investment, risk, accounting, and treasury activities.

Executive management structure, by gender and age

Executive management of BRD Pensii	Women		Men		Total	
	No.	%	No.	%	No.	%
< 30	0	0	0	0	0	0
30–50 years	1	50	0	0	1	50
>50 years	0	0	1	50	1	50
Total	1	50	1	50	2	100

xxxx

0.5 is the gender diversity rate at the executive management level.

The Board of Directors provides strategic leadership for the Company, continuously assessing the impacts, risks, and opportunities associated with its operations. It establishes development directions, major policies, and the governance framework, ensuring the proper implementation of strategies, internal control systems, and risk and compliance policies. Operational management is carried out by executive management, which may propose the establishment of committees dedicated to critical issues, contributing to efficient and prudent administration. Together, the management structures ensure robust oversight, a transparent decision-making framework, and a risk management system aligned with legal requirements and the Company's long-term objectives.

ADDENDUM 4. KPIs Disclosed under Article 8 Taxonomy Regulation

Template 1:

Assets for the calculation of GAR (Turnover)

Disclosure reference date/period 31.12.2025

Stock/Flow (Million EUR)	a	b	c	Breakdown per environmental objective						j	k	l	m	n	o	p
	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO	Of which Use of Proceeds	Of which transitional	Of which enabling	Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7(9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)
1 GAR – Covered assets in both numerator and denominator																
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	50,075.61	6,001.53	4,543.56	4,543.50	0.06	-	-	-	-	4,147.52	-	-	14,557.11	-	-	1,943.92
3 Financial undertakings	10,099.75	266.37	26.53	26.47	0.06	-	-	-	-	-	-	-	9,858.14	-	-	15.94
4 Loans and advances	7,572.97	250.23	18.46	18.44	0.02	-	-	-	-	-	-	-	7,554.51	-	-	15.05
5 Debt securities, including UoP	2,311.70	16.14	8.07	8.03	0.04	-	-	-	-	-	-	-	2,303.63	-	-	0.89
6 Equity instruments	215.08	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Non-financial undertakings	9,847.98	2,823.93	1,767.26	1,755.95	-	-	-	-	-	1,386.44	-	-	4,698.96	-	-	1,927.99
8 Loans and advances	9,769.34	2,773.59	1,767.26	1,755.95	-	-	-	-	-	1,386.44	-	-	4,698.96	-	-	1,927.99
9 Debt securities, including UoP	78.64	50.33	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Households	27,819.94	2,911.24	2,761.08	2,761.08	-	-	-	-	-	2,761.08	-	-	-	-	-	-
12 of which loans collateralised by residential immovable property	27,449.37	2,911.24	2,761.08	2,761.08	-	-	-	-	-	2,761.08	-	-	-	-	-	-
13 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 of which motor vehicle loans	370.57	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Local governments financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Other local government financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Collateral obtained by taking possession: residential and commercial immovable properties	45.64	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Exposures included on a voluntary basis (3)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Total GAR assets	50,121.24	6,001.53	4,543.56	4,543.56	0.06	-	-	-	-	4,147.52	-	-	14,557.11	-	-	1,943.92
21 Assets not covered for GAR calculation	175,225.01															
22 Central governments and Supranational issuers	77,889.55															
23 Central banks exposure	19,637.43															
24 Trading book	3,530.91															
25 Undertakings and entities not subject to CSRD	62,294.07															
26 SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	59,278.71															
27 Loans and advances	58,755.92															
28 of which loans collateralised by commercial immovable property	15,818.04															
29 of which building renovation loans																

Stock/Flow (Million EUR)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling				
				Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO				Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7(9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)
30	Debt securities	475.00														
31	Equity instruments	47.78														
32	Non-EU country counterparties not subject to CSRD disclosure obligations	3,015.36														
33	Loans and advances	2,508.03														
34	Debt securities	506.69														
35	Equity instruments	0.64														
36	Derivatives	145.82														
37	On demand interbank loans	2,042.68														
38	Cash and cash-related assets	5,548.23														
39	Other categories of assets (e.g. Goodwill, commodities etc.)	4,136.32														
40	Total assets	225,346.25	6,001.53	4,543.56	4,543.50	0,06	-	-	-	-	4,147.52	-	-	-	-	1,943.92
Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments																
41	Financial guarantees	1,225.38	20.89	20.01	20.01	-	-	-	-	-	-	-	1,205.37	-	-	-
42	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	of which equity instrument	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
- Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Assets for the calculation of GAR (CapEx)

Disclosure reference date/period 31.12.2025

Stock/Flow (Million EUR)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7 (9)	Of which not assessed consid- ered nonmaterial by the credit institution (2)
					Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO							
1	GAR – Covered assets in both numerator and denominator																
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	50,075.61	7,179.44	4,622.04	4,621.88	0.16	-	-	-	-	4,147.52	-	-	14,478.62	-	-	1,943.92
3	Financial undertakings	10,099.75	281.44	34.81	34.65	0.16	-	-	-	-	-	-	-	9,849.86	-	-	15.94
4	Loans and advances	7,572.97	257.18	22.68	22.61	0.07	-	-	-	-	-	-	-	7,550.29	-	-	15.05
5	Debt securities, including UoP	2,311.70	24.26	12.13	12.04	0.09	-	-	-	-	-	-	-	2,299.57	-	-	0.89
6	Equity instruments	215.08	-	-	-	-	-	-	-	-		-	-	-	-	-	-
7	Non-financial undertakings	9,847.98	3,986.76	1,826.15	1,826.15	-	-	-	-	-	1,386.44	-	-	4,628.76	-		1,927.99
8	Loans and advances	9,769.34	3,918.34	1,826.15	1,826.15	-	-	-	-	-	1,386.44	-	-	4,628.76	-		1,927.99
9	Debt securities, including UoP	78.64	68.42	-	-	-	-	-	-	-	-	-	-	-	-		-
10	Equity instruments	-	-	-	-	-	-	-	-	-		-	-	-	-		-
11	Households	27,819.94	2,911.24	2,761.08	2,761.08	-	-		-		2,761.08	-	-	-	-		-
12	of which loans collateralised by residential immovable property	27,449.37	2,911.24	2,761.08	2,761.08	-	-		-		2,761.08	-	-	-	-		-
13	of which building renovation loans	-	-	-	-	-	-		-		-	-	-	-	-		-
14	of which motor vehicle loans	370.57	-	-	-	-	-				-	-	-	-	-		-
15	Local governments financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-		-
16	Housing financing	-	-	-	-	-		-			-	-	-	-	-		-
17	Other local government financing	2,307.94	-	-	-	-	-	-	-	-	-	-	-	-	-		-
18	Collateral obtained by taking possession: residential and commercial immovable properties	45.64	-	-	-	-	-	-	-		-	-	-	-	-		-
19	Exposures included on a voluntary basis (3)	-	-	-	-	-		-			-	-	-	-	-		
20	Total GAR assets	50,121.24	7,179.44	4,622.04	4,621.88	0.16	-	-	-	-	4,147.52	-	-	14,478.62	-	-	1,943.92
21	Assets not covered for GAR calculation	175,225.01															
22	Central governments and Supranational issuers	77,889.55															
23	Central banks exposure	19,637.43															
24	Trading book	3,530.91															
25	Undertakings and entities not subject to CSRD	62,294.07															
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	59,278.71															
27	Loans and advances	58,755.92															
28	of which loans collateralised by commercial immovable property	15,818.04															
29	of which building renovation loans																
30	Debt securities	475.00															
31	Equity instruments	47.78															
32	Non-EU country counterparties not subject to CSRD disclosure obligations	3,015.36															
33	Loans and advances	2,508.03															

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
				Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling				
				Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO				Non assessed exposures	Of which financing non material activities of counterparties (1)	Of which exposures financing counter parties reporting in accordance with Article 7(9)	Of which not assessed considered nonmaterial by the credit institution (2)
Stock/Flow (Million EUR)	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned													
34	Debt securities	506.69														
35	Equity instruments	0.64														
36	Derivatives	145.82														
37	On demand interbank loans	2,042.68														
38	Cash and cash-related assets	5,548.23														
39	Other categories of assets (e.g. Goodwill, commodities etc.)	4,136.32														
40	Total assets	225,346.25	7,194.44	4,622.04	4,621.88	0.16	-	-	-	4,147.52	-	-	14,478.62	-	-	1,943.92
Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments																
41	Financial guarantees	1,225.38	75.91	25.26	25.26	-	-	-	-	-	-	-	1,200.12	-	-	-
42	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	of which equity instrument	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8)(a) and (b) of this Regulation.

(2) In accordance with Article 4(1a) of this Regulation.

(3) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange for cancellation of debts.
- Credit institutions shall duplicate this template for reporting on stocks for the calculation of GAR stock, and reporting on new assets for the calculation of GAR flow.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 2:

GAR sector information (Turnover)

Disclosure reference date/period 31.12.2025

A		b	c	d	e	f	g	h	i	j
Breakdown by sector - NACE 4 digits level (code and label)		Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO
1	H 49.50 Transport via pipeline	797.15	-	-	-	-	-	-	-	-
2	G 47.11 Non-specialised retail sale of predominately food, beverages or tobacco	709.84	-	-	-	-	-	-	-	-
3	C 29.10 Manufacture of motor vehicles	429.23	407.77	-	-	-	-	-	-	-
4	K 61.10 Wired, wireless, and satellite telecommunication activities	392.66	71.07	-	-	-	-	-	-	-
5	G 47.54 Retail sale of electrical household appliances	251.58	-	-	-	-	-	-	-	-
6	D 35.22 Distribution of gaseous fuels through mains	240.79	12.04	12.04	12.04	-	-	-	-	-
7	H 53.20 Other postal and courier activities	215.01	-	-	-	-	-	-	-	-
8	F 41.00 Construction of residential and non-residential buildings	199.55	-	-	-	-	-	-	-	-
9	C 24.42 Aluminium production	198.55	163.73	163.73	163.73	-	-	-	-	-
10	C 11.07 Manufacture of soft drinks and bottled waters	185.28	-	-	-	-	-	-	-	-
11	Nuclear activities (1)	-								
12	Fossil gas activities (2)	-								
13	Of which non-assessed exposures (3)	3,446.27								

(1) Referred to in Sections 4.26, 4.27 and 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(2) Referred to in Sections 4.29, 4.30 and 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(3) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- Credit institutions shall disclose in this template information on top ten exposures in the banking book towards top ten sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.
- The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

GAR – Informații pe sectoare (CapEx)

Disclosure reference date/period 31.12.2025

A	b	c	d	e	f	g	h	i	j
Breakdown by sector - NACE 4 digits level (code and label)	Total [gross] carrying amount	Of which Taxonomy eligible	Of which Taxonomy aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO
1 H 49.50 Transport via pipeline	797.15	779.86	-	-	-	-	-	-	-
2 G 47.11 Non-specialised retail sale of predominately food, beverages or tobacco	709.84	-	-	-	-	-	-	-	-
3 C 29.10 Manufacture of motor vehicles	429.23	412.06	-	-	-	-	-	-	-
4 K 61.10 Wired, wireless, and satellite telecommunication activities	392.66	173.16	-	-	-	-	-	-	-
5 G 47.54 Retail sale of electrical household appliances	251.58	-	-	-	-	-	-	-	-
6 D 35.22 Distribution of gaseous fuels through mains	240.79	223.94	223.94	223.94	-	-	-	-	-
7 H 53.20 Other postal and courier activities	215.01	-	-	-	-	-	-	-	-
8 F 41.00 Construction of residential and non-residential buildings	199.55	-	-	-	-	-	-	-	-
9 C 24.42 Aluminium production	198.55	70.63	70.63	70.63	-	-	-	-	-
10 C 11.07 Manufacture of soft drinks and bottled waters	185.28	-	-	-	-	-	-	-	-
11 Nuclear activities (1)	-								
12 Fossil gas activities (2)	-								
13 Of which non-assessed exposures (3)	3,421.38								

(1) Referred to in Sections 4.26, 4.27 and 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(2) Referred to in Sections 4.29, 4.30 and 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139.

(3) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- Credit institutions shall disclose in this template information on top ten exposures in the banking book towards top ten sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.
- The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 3:

GAR KPI stock (Turnover)

Disclosure reference date 31.12.2025

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible												
			Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems					
				CCM	CCA	WTR	CE	PPC	BIO					
1	GAR – Covered assets in both numerator and denominator													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	11.98%	9.07%	9.07%	-	-	-	-	-	8.28%	-	-	75.71%	29.07%
3	Financial undertakings	2.64%	0.26%	0.26%	-	-	-	-	-	-	-	-	9.96%	97.61%
4	Loans and advances	3.30%	0.24%	0.24%	-	-	-	-	-	-	-	-	7.38%	99.76%
5	Debt securities, including UoP	0.70%	0.35%	0.35%	-	-	-	-	-	-	-	-	50.00%	99.65%
6	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
7	Non-financial undertakings	28.68%	17.83%	17.83%	-	-	-	-	-	14.08%	-	-	62.18%	47.71%
8	Loans and advances	28.39%	17.97%	18.09%	-	-	-	-	-	14.19%	-	-	63.31%	48.10%
9	Debt securities, including UoP	64.00%	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
11	Households	10.46%	9.92%	9.92%	-		-			9.92%	-	-	94.84%	-
12	of which loans collateralised by residential immovable property	10.61%	10.06%	10.06%	-		-			10.06%	-	-	94.84%	-
13	of which building renovation loans	-	-	-	-		-			-	-	-	-	-
14	of which motor vehicle loans	-	-	-						-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-		-			-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-		-			-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-		-			-	-	-	-	
20	Total GAR assets	11.97%	9.07%	9.07%	-	-	-	-	-	8.27%	-	-	75.71%	29.04%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on stock of exposures calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

GAR KPI stock (CapEx)

Disclosure reference date 31.12.2025

	a	b	c	d	e	f	g	h	i	j	k	l	m
	Taxonomy-eligible	Taxonomy-aligned	Climate Change Mitigation CCM	Climate Change Adaptation CCA	Water and marine resources WTR	Circular economy CE	Pollution PPC	Biodiversity and Ecosystems BIO	Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non-assessed exposures (1)
% (compared to corresponding total covered assets in the denominator)													
1	GAR – Covered assets in both numerator and denominator												
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	14.34%	9.23%	9.23%	-	-	-	-	8.28%	-	-	64.38%	28.89%
3	Financial undertakings	2.79%	0.34%	0.34%	-	-	-	-	-	-	-	12.37%	97.53%
4	Loans and advances	3.40%	0.30%	0.30%	-	-	-	-	-	-	-	8.82%	97.53%
5	Debt securities, including UoP	1.05%	0.52%	0.52%	-	-	-	-	-	-	-	50.00%	99.70%
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	0.00%
7	Non-financial undertakings	40.60%	18.54%	18.54%	-	-	-	-	14.08%	-	-	45.81%	47.00%
8	Loans and advances	40.22%	18.69%	18.69%	-	-	-	-	14.19%	-	-	46.61%	47.38%
9	Debt securities, including UoP	87.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
11	Households	10.46%	9.92%	9.92%	-	-	-	-	9.92%	-	-	94.84%	-
12	of which loans collateralised by residential immovable property	10.61%	10.06%	10.06%	-	-	-	-	10.06%	-	-	94.84%	-
13	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-
14	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-	-	-	-	-	-	-	-	-
20	Total GAR assets	14.32%	9.22%	9.22%	-	-	-	-	8.27%	-	-	64.38%	28.89%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on stock of exposures calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 4: GAR KPI flow (Turnover)

Disclosure reference date 31.12.2025

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy-aligned in Taxonomy-eligible	Non-assessed exposures (%)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems					
				CCM	CCA	WTR	CE	PPC	BIO					
1	GAR – Covered assets in both numerator and denominator													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	19.31%	13.36%	7.84%	-	-	-	-	-	11.69%	-	-	69.19%	28.36%
3	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
7	Non-financial undertakings	32.89%	19.18%	19.18%	-	-	-	-	-	15.09%	-	-	58.31%	69.38%
8	Loans and advances	32.89%	19.18%	19.18%	-	-	-	-	-	15.09%	-	-	58.31%	69.38%
9	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-		-	-	-	-
11	Households	10.72%	10.08%	-	-		-			10.08%	-	-	94.09%	-
12	of which loans collateralised by residential immovable property	11.05%	10.40%	-	-		-			10.40%	-	-	94.09%	-
13	of which building renovation loans	-	-	-	-		-			-	-	-	-	-
14	of which motor vehicle loans	-	-	-			-			-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-		-			-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-		-			-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-		-			-	-	-	-	
20	Total GAR assets	19.24%	13.31%	7.81%	-	-	-	-	-	11.65%	-	-	69.19%	28.24%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on flow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

GAR KPI flow (CapEx)

Disclosure reference date 31.12.2025

%	(compared to corresponding total covered assets in the denominator)	Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of Taxonomy-aligned in Taxonomy-eligible	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems					
				CCM	CCA	WTR	CE	PPC	BIO					
1	GAR – Covered assets in both numerator and denominator													
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	23.35%	13.46%	13.46%	-	-	-	-	-	11.69%	-	-	57.65%	28.36%
3	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Non-financial undertakings	42.75%	19.41%	19.41%	-	-	-	-	-	15.09%	-	-	45.41%	69.38%
8	Loans and advances	42.75%	19.41%	19.41%	-	-	-	-	-	15.09%	-	-	45.41%	69.38%
9	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Households	10.72%	10.08%	10.08%	-	-	-	-	-	10.08%	-	-	94.09%	-
12	of which loans collateralised by residential immovable property	11.05%	10.40%	10.40%	-	-	-	-	-	10.40%	-	-	94.09%	-
13	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
14	of which motor vehicle loans	0.00%	0.00%	0.00%	-	-	-	-	-	-	-	-	-	-
15	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Exposures included on a voluntary basis (2)	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Total GAR assets	23.25%	13.41%	13.41%	-	-	-	-	-	11.65%	-	-	57.65%	28.24%

(1) In accordance with Article 7(8) of this Regulation.

(2) In accordance with Article 7(3) of this Regulation.

Explanatory notes:

- Institutions shall disclose in this template the GAR KPIs on flow of new loans and advances, debt securities, equity instruments, and repossessed collateral during the financial year prior to the disclosure reference date calculated based on the data disclosed in template 1, on covered assets.
- Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

Template 5
 KPI off-balance sheet exposures -stock (Turnover)

Disclosure reference date 31.12.2025

(compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective									Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems	Of which Use of Proceeds	Of which transitional	Of which enabling	
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	1.70%	1.63%	1.63%	-	-	-	-	-	-	-	-	98.37%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

KPI off-balance sheet exposures -stock (CapEx)

Disclosure reference date 31.12.2025

%(compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective									Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems	Of which Use of Proceeds	Of which transitional	Of which enabling	
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	6.19%	2.06%	2.06%	-	-	-	-	-	-	-	-	97.94%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8) of this Regulation.

- Explanatory notes:
- Institutions shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets.
 - Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures.
 - Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

KPI off-balance sheet exposures -flow (Turnover)

Disclosure reference date 31.12.2025

% (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems				
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	0.13%	0.04%	0.04%	0.00%	0.00%	-	-	-	-	-	-	99.96%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

KPI off-balance sheet exposures -flow (CapEx)

Disclosure reference date 31.12.2025

% (compared to corresponding total off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l
		Taxonomy-eligible	Taxonomy-aligned	Breakdown per environmental objective						Of which Use of Proceeds	Of which transitional	Of which enabling	Non-assessed exposures (1)
				Climate Change Mitigation	Climate Change Adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and Ecosystems				
				CCM	CCA	WTR	CE	PPC	BIO				
1	Financial guarantees (FinGuar KPI)	4.64%	0.38%	0.38%	-	-	-	-	-	-	-	-	98.37%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-

(1) In accordance with Article 7(8) of this Regulation.

Explanatory notes:

- 1. Institutions shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets.
- 2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures.
- 3. Credit institutions shall duplicate this template for turnover-based and CapEx-based disclosures.

1. Assets for the calculation of GAR (Turnover)

Million RON		Total [gross] carrying amount	Year End at 31.12.2024																															
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)									
			Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)									
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling				
	GAR - Covered assets in both numerator and denominator																																	
1	Loan and advances, debt securities and equity instruments not HFT eligible for GAR calculation	52,992.93	5,198.49	2,558.77	2,543.82	-	93.06	1,772.96	11.50	-	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	9,024.32	2,558.77	2,543.82	-	93.06
2	Financial undertakings	12,762.87	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
3	Credit institutions	9,586.54	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
4	Loans and advances	7,352.93	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	Debt securities, including UoP	2,233.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	Equity instruments	0.47	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-		
7	Other financial corporations	3,176.33	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
8	of which investment firms	1,799.87	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9	Loans and advances	3.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	1,647.68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
11	Equity instruments	148.45	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-		
16	of which insurance undertakings	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
17	Loans and advances	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-		
20	Non-financial undertakings	6,942.82	2,729.39	93.06	78.11	-	93.06	146.86	-	-	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	4,929.12	93.06	78.11	-	93.06
21	Loans and advances	6,868.84	2,655.42	93.06	78.11	-	93.06	146.86	-	-	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	4,929.12	93.06	78.11	-	93.06
22	Debt securities, including UoP	73.97	73.97	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
23	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-		
24	Households	25,998.75	2,465.71	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-								2,465.71	2,465.71	2,465.71	-	-		
25	of which loans collateralized by residential immovable property	25,905.83	2,465.71	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-								2,465.71	2,465.71	2,465.71	-	-		
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-								-	-	-	-	-		
27	of which motor vehicle loans	92.92	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-								-	-	-	-	-		
28	Local governments financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	41.46	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	53,492.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
33	Financial and non-financial undertakings	41,632.21																																
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	39,157.49																																
35	Loans and advances	39,127.71																																
36	of which loans collateralised by commercial immovable property	11,275.74																																
37	of which building renovation loans	-																																

1. Assets for the calculation of GAR (Turnover)

		Total [gross] carrying amount	Year End at 31.12.2024																															
			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)											
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling						
Million RON																																		
38	Debt securities	-																																
39	Equity instruments	29.78																																
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,474.73																																
41	Loans and advances	1,490.99																																
42	Debt securities	584.30																																
43	Equity instruments	399.44																																
44	Derivatives	173.03																																
45	On demand interbank loans	2,422.20																																
46	Cash and cash-related assets	5,227.28																																
47	Other categories of assets (e.g. Goodwill, commodities etc.)	4,037.40																																
48	Total GAR assets	106,526.52	5,198.49	2,558.77	2,543.82	-	93.06	1,772.96	11.50	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	-	9,024.32	2,558.77	2,543.82	-	93.06
49	Assets not covered for GAR calculation	88,665.45																																
50	Central governments and Supranational issuers	67,996.60																																
51	Central banks exposure	17,087.07																																
52	Trading book	3,581.78																																
53	Total assets	195,191.97	5,198.49	2,558.77	2,543.82	-	93.06	1,772.96	11.50	-	-	-	-	-	2,050.39	-	-	-	-	34.07	-	-	-	-	42.39	-	-	-	-	9,024.32	2,558.77	2,543.82	-	93.06
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																																		
54	Financial guarantees	720.70	198.53	714	714	-	714	21.64	-	-	-	-	-	-	183.98	-	-	-	-	-	-	-	-	-	-	-	-	-	404.15	714	714	-	714	
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

1. Assets for the calculation of GAR (CapEx)

Million RON		Total [gross] carrying amount	Year End at 31.12.2024																													
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)							
			Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)							
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator																															
1	Loan and advances, debt securities and equity instruments not HFT eligible for GAR calculation	52,992.93	5,670.37	2,835.45	2,543.82	-	369.73	1,772.96	11.50	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	9,553.48	2,836.00	2,543.82	-	370.29		
2	Financial undertakings	12,762.87	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
3	Credit institutions	9,586.54	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	Loans and advances	7,352.93	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	2,233.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6	Equity instruments	0.47	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	
7	Other financial corporations	3,176.33	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	1,799.87	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	3.74	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	1,647.68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	148.45	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	66.47	-	-	-	-	-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	66.47	-	-	-		-	-	11.50	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	6,942.82	3,201.27	369.73	78.11	-	369.73	146.86	-	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	5,458.28	370.29	78.11	-	370.29		
21	Loans and advances	6,868.84	3,127.30	369.73	78.11	-	369.73	146.86	-	-	-	-	-	2,107.67	0.55	-	0.55	34.07	-	-	-	42.39	-	-	-	5,458.28	370.29	78.11	-	370.29		
22	Debt securities, including UoP	73.97	73.97	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	25,998.75	2,465.71	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-								2,465.71	2,465.71	2,465.71	-	-			
25	of which loans collateralized by residential immovable property	25,905.83	2,465.74	2,465.71	2,465.71	-	-	-	-	-	-	-	-	-	-	-	-								2,465.71	2,465.71	2,465.71	-	-			
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-								-	-	-	-	-	-	-	
27	of which motor vehicle loans	92.92	-	-	-	-	-	-	-	-	-	-	-												-	-	-	-	-	-	-	
28	Local governments financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	7,288.50	3.39	-	-	-	-	1,626.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,629.49	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	41.46	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	53,492.12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33	Financial and non-financial undertakings	41,632.21																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	39,157.49																														
35	Loans and advances	39,127.71																														
36	of which loans collateralised by commercial immovable property	11,275.74																														
37	of which building renovation loans	-																														

1. Assets for the calculation of GAR (CapEx)

[illegible]

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	C 2910 Manufacture of motor vehicles	288.41	-			-	-			-	-			-	-			-	-			-	-			288.41	-		
2	F 4120 Construction of residential and non-residential buildings	245.06	-			-	-			-	-			-	-			-	-			-	-			245.06	-		
3	D 3522 Distribution of gaseous fuels through mains	23712	-			-	-			-	-			-	-			-	-			-	-			23712	-		
4	D 3523 Trade of gas through mains	228.09	78.11			-	-			-	-			-	-			-	-			-	-			228.09	78.11		
5	C 2442 Aluminium production	203.51	-			-	-			-	-			-	-			-	-			-	-			203.51	-		
6	C 2751 Manufacture of electric domestic appliances	194.85	-			-	-			-	-			-	-			-	-			-	-			194.85	-		
7	H 5320 Other postal and courier activities	183.82	-			-	-			-	-			-	-			-	-			-	-			183.82	-		
8	D 3514 Trade of electricity	113	-			-	-			-	-			-	-			-	-			-	-			113	-		
9	D 3513 Distribution of electricity	95.34	14.95			-	-			-	-			-	-			-	-			-	-			95.34	14.95		
10	C 2221 Manufacture of plastic plates, sheets, tubes and profiles	134.50	-			-	-			-	-			-	-			-	-			-	-			134.50	-		
11	C 2361 Manufacture of concrete products for construction purposes	127.36	-			-	-			-	-			-	-			-	-			-	-			127.36	-		
12	N 7711 Renting and leasing of cars and light motor vehicles	124.95	-			-	-			-	-			-	-			-	-			-	-			124.95	-		
13	J 6110 Wired telecommunications activities	124.33	-			-	-			-	-			-	-			-	-			-	-			124.33	-		
14	C 2223 Manufacture of builders' ware of plastic	85.81	-			-	-			-	-			-	-			-	-			-	-			85.81	-		
15	J 6120 Wireless telecommunications activities	0.55	-			-	-			-	-			-	-			-	-			-	-			0.55	-		
16	C 3020 Manufacture of railway locomotives and rolling stock	55.89	-			-	-			-	-			-	-			-	-			-	-			55.89	-		
17	C 2511 Manufacture of metal structures and parts of structures	49.98	-			-	-			-	-			-	-			-	-			-	-			49.98	-		
18	H 5110 Passenger air transport	43.62	-			-	-			-	-			-	-			-	-			-	-			43.62	-		
19	C 2932 Manufacture of other parts and accessories for motor vehicles	41.63	-			-	-			-	-			147.01	-			-	-			-	-			188.64	-		
20	H 4920 Freight rail transport	36.25	-			-	-			-	-			-	-			-	-			-	-			36.25	-		
21	C 2732 Manufacture of other electronic and electric wires and cables	34.93	-			-	-			-	-			-	-			-	-			-	-			34.93	-		
22	C 2363 Manufacture of ready-mixed concrete	22.72	-			-	-			-	-			-	-			-	-			-	-			22.72	-		
23	E 3811 Collection of non-hazardous waste	16.43	-			-	-			-	-			-0.01	-			-	-			-	-			16.42	-		
24	C 2612 Manufacture of loaded electronic boards	15.89	-			-	-			-	-			-	-			-	-			-	-			15.89	-		
25	C 2015 Manufacture of fertilisers and nitrogen compounds	15.55	-			-	-			-	-			-	-			-	-			-	-			15.55	-		
26	H 5224 Cargo handling	0.15	-			-	-			-	-			-	-			-	-			-	-			0.15	-		
27	F 4321 Electrical installation	7.73	-			-	-			-	-			-	-			-	-			-	-			7.73	-		
28	E 3600 Water collection, treatment and supply	6.42	-			-	-			-	-			-	-			-	-			-	-			6.42	-		
29	C 3030 Manufacture of air and spacecraft and related machinery	5.86	-			-	-			-	-			-	-			-	-			-	-			5.86	-		
30	C 2341 Manufacture of ceramic household and ornamental articles	4.86	-			-	-			-	-			-	-			-	-			-	-			4.86	-		
31	H 4931 Urban and suburban passenger land transport	4.65	-			-	-			-	-			-	-			-	-			-	-			4.65	-		
32	C 2815 Manufacture of bearings, gears, gearing and driving elements	3.24	-			-	-			-	-			-	-			-	-			-	-			3.24	-		
33	M 7120 Technical testing and analysis	3.16	-			-	-			-	-			-	-			-	-			-	-			3.16	-		
34	M 7112 Engineering activities and related technical consultancy	3.08	-			-	-			-	-			-	-			-	-			-	-			3.08	-		
35	F 4222 Construction of utility projects for electricity and telecommunications	2.26	-			-	-			-	-			-	-			-	-			-	-			2.26	-		

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
36	L 6832 Management of real estate on a fee or contract basis	1.44	-			-	-			-	-			-	-			-	-			1.44	-						
37	H 4910 Passenger rail transport, interurban	1.05	-			-	-			-	-			-	-			-	-			1.05	-						
38	C 2572 Manufacture of locks and hinges	0.96	-			-	-			-	-			-	-			-	-			0.96	-						
39	C 2351 Manufacture of cement	0.93	-			-	-			-	-			-	-			-	-			0.93	-						
40	C 2420 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.70	-			-	-			-	-			-	-			-	-			0.70	-						
41	C 2611 Manufacture of electronic components	0.69	-			-	-			-	-			-	-			-	-			0.69	-						
42	J 6311 Data processing, hosting and related activities	0.23	-			-	-			-	-			-	-			-	-			0.23	-						
43	C 2813 Manufacture of other pumps and compressors	0.22	-			-	-			-	-			-	-			-	-			0.22	-						
44	C 2229 Manufacture of other plastic products	0.22	-			-	-			-	-			-	-			-	-			0.22	-						
45	H 4941 Freight transport by road	0.18	-			-	-			-	-			-	-			-	-			0.18	-						
46	C 3011 Building of ships and floating structures	0.16	-			-	-			-	-			-	-			-	-			0.16	-						
47	C 2550 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0.12	-			-	-			-	-			-	-			-	-			0.12	-						
48	C 2931 Manufacture of electrical and electronic equipment for motor vehicles	0.09	-			-	-			-	-			-	-			-	-			0.09	-						
49	F 4211 Construction of roads and motorways	0.07	-			142.47	-			-	-			-	-			-	-			142.54	-						
50	F 4299 Construction of other civil engineering projects nec	-	-			-	-			-	-			-	-			-	-			-	-						
51	C 2825 Manufacture of non-domestic cooling and ventilation equipment	-	-			-	-			-	-			-	-			-	-			-	-						
52	C 3317 Repair and maintenance of other transport equipment	-	-			-	-			-	-			-	-			-	-			-	-						
53	D 3511 Production of electricity	-0.72	-			-	-			-	-			-	-			-	-			-0.72	-						
54	H 5310 Postal activities under universal service obligation	-0.05	-			-	-			-	-			-	-			-	-			-0.05	-						
55	B 0910 Support activities for petroleum and natural gas extraction	-	-			2.36	-			-	-			-	-			-	-			2.36	-						
56	C 1011 Processing and preserving of meat	-	-			-	-			-	-			31.67	-			-	-			31.67	-						
57	C 1012 Processing and preserving of poultry meat	-	-			-	-			-	-			86.64	-			-	-			86.64	-						
58	C 1013 Production of meat and poultry meat products	-	-			-	-			-	-			22.38	-			-	-			22.38	-						
59	C 1061 Manufacture of grain mill products	-	-			-	-			-	-			13.25	-			-	-			13.25	-						
60	C 1071 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-			-	-			-	-			0.41	-			-	-			0.41	-						
61	C 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	-	-			-	-			-	-			10.49	-			-	-			10.49	-						
62	C 1105 Manufacture of beer	-	-			-	-			-	-			2.79	-			-	-			2.79	-						
63	C 1107 Manufacture of tobacco products	-	-			-	-			-	-			168.86	-			-	-			168.86	-						
64	C 1413 Manufacture of other outerwear	-	-			-	-			-	-			0.60	-			-	-			0.60	-						
65	C 1520 Manufacture of footwear	-	-			-	-			-	-			-	-			-	-			-	-						
66	C 1712 Manufacture of paper and paperboard	-	-			-	-			-	-			23.41	-			-	-			23.41	-						
67	C 2110 Manufacture of basic pharmaceutical products	-	-			-	-			-	-			-	-			33.74	-			33.74	-						
68	C 2120 Manufacture of pharmaceutical preparations	-	-			-	-			-	-			-	-			0.33	-			0.33	-						
69	C 3102 Manufacture of kitchen furniture	-	-			-	-			-	-			8.10	-			-	-			8.10	-						

2. GAR – Information by Sector (Turnover)

Breakdown by sector - NACE 4 digits level (code and label)		Year end at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
70	C 3109 Manufacture of other furniture	-	-			-	-			-	-			23.70	-			-	-			-	-			23.70	-		
71	G 4621 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-			-	-			-	-			1.05	-			-	-			-	-			1.05	-		
72	G 4635 Wholesale of tobacco products	-	-			-	-			-	-			2.78	-			-	-			-	-			2.78	-		
73	G 4639 Non-specialised wholesale of food, beverages and tobacco	-	-			-	-			-	-			24.85	-			-	-			-	-			24.85	-		
74	G 4645 Wholesale of perfume and cosmetics	-	-			-	-			-	-			-0.04	-			-	-			-	-			-0.04	-		
75	G 4646 Wholesale of pharmaceutical goods	-	-			-	-			-	-			1.87	-			-	-			-	-			1.87	-		
76	G 4671 Wholesale of solid, liquid and gaseous fuels and related products	-	-			-	-			-	-			0.26	-			-	-			-	-			0.26	-		
77	G 4673 Wholesale of wood, construction materials and sanitary equipment	-	-			-	-			-	-			0.49	-			-	-			-	-			0.49	-		
78	G 4674 Wholesale of hardware, plumbing and heating equipment and supplies	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
79	G 4677 Wholesale of waste and scrap	-	-			-	-			-	-			2.96	-			-	-			-	-			2.96	-		
80	G 4690 Non-specialised wholesale trade	-	-			-	-			-	-			10.11	-			-	-			-	-			10.11	-		
81	G 4711 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-			-	-			-	-			1,327.05	-			-	-			-	-			1,327.05	-		
82	G 4719 Other retail sale in non-specialised stores	-	-			-	-			-	-			0.66	-			-	-			-	-			0.66	-		
83	G 4742 Retail sale of telecommunications equipment in specialised stores	-	-			-	-			-	-			0.37	-			-	-			-	-			0.37	-		
84	G 4752 Retail sale of hardware, paints and glass in specialised stores	-	-			-	-			-	-			42.06	-			-	-			-	-			42.06	-		
85	G 4754 Retail sale of electrical household appliances in specialised stores	-	-			-	-			-	-			92.57	-			-	-			-	-			92.57	-		
86	G 4764 Retail sale of sporting equipment in specialised stores	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
87	G 4773 Dispensing chemist in specialised stores	-	-			-	-			-	-			1.25	-			-	-			-	-			1.25	-		
88	G 4778 Other retail sale of new goods in specialised stores	-	-			-	-			-	-			0.36	-			-	-			-	-			0.36	-		
89	I 5510 Hotels and similar accommodation	-	-			-	-			-	-			2.45	-			-	-			-	-			2.45	-		
90	O 8425 Fire service activities	-	-			-	-			-	-			-	-			-	-			42.39	-			42.39	-		
91	Q 8690 Other human health activities	-	-			1.03	-			-	-			-	-			-	-			-	-			1.03	-		
92	G 4775 Retail sale of cosmetic and toilet articles in specialised stores	-	-			1.00	-			-	-			-	-			-	-			-	-			1.00	-		
93	H 4950 Transport via pipeline	-	-			-	-			-	-			-	-			-	-			-	-			0.00	-		

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
1	H 4950 Transport via pipeline	519.03	276.21			-	-			-	-			-	-			-	-			-	-			519.03	276.21		
2	C 2910 Manufacture of motor vehicles	288.41	-			-	-			-	-			-	-			-	-			-	-			288.41	-		
3	F 4120 Construction of residential and non-residential buildings	245.06	-			-	-			-	-			-	-			-	-			-	-			245.06	-		
4	D 3522 Distribution of gaseous fuels through mains	237.15	0.04			-	-			-	-			-	-			-	-			-	-			237.15	0.04		
5	D 3523 Trade of gas through mains	228.09	78.11			-	-			-	-			-	-			-	-			-	-			228.09	78.11		
6	C 2442 Aluminium production	159.11	-			-	-			-	-			-	-			-	-			-	-			159.11	-		
7	C 2751 Manufacture of electric domestic appliances	194.85	-			-	-			-	-			-	-			-	-			-	-			194.85	-		
8	H 5320 Other postal and courier activities	183.82	-			-	-			-	-			-	-			-	-			-	-			183.82	-		
9	D 3514 Trade of electricity	2.42	-			-	-			-	-			-	-			-	-			-	-			2.42	-		
10	D 3513 Distribution of electricity	84.20	15.39			-	-			-	-			-	-			-	-			-	-			84.20	15.39		
11	C 2221 Manufacture of plastic plates, sheets, tubes and profiles	134.50	-			-	-			-	-			-	-			-	-			-	-			134.50	-		
12	C 2361 Manufacture of concrete products for construction purposes	127.36	-			-	-			-	-			-	-			-	-			-	-			127.36	-		
13	N 7711 Renting and leasing of cars and light motor vehicles	124.95	-			-	-			-	-			-	-			-	-			-	-			124.95	-		
14	J 6110 Wired telecommunications activities	124.33	-			-	-			-	-			-	-			-	-			-	-			124.33	-		
15	C 2223 Manufacture of builders' ware of plastic	85.81	-			-	-			-	-			-	-			-	-			-	-			85.81	-		
16	J 6120 Wireless telecommunications activities	0.16	-			-	-			-	-			-	-			-	-			-	-			0.16	-		
17	C 3020 Manufacture of railway locomotives and rolling stock	55.89	-			-	-			-	-			-	-			-	-			-	-			55.89	-		
18	C 2511 Manufacture of metal structures and parts of structures	49.98	-			-	-			-	-			-	-			-	-			-	-			49.98	-		
19	H 5110 Passenger air transport	43.62	-			-	-			-	-			-	-			-	-			-	-			43.62	-		
20	C 2832 Manufacture of other parts and accessories for motor vehicles	41.63	-			-	-			-	-		147.01	-			-	-			-	-				188.64	-		
21	H 4920 Freight rail transport	36.25	-			-	-			-	-			-	-			-	-			-	-			36.25	-		
22	C 2732 Manufacture of other electronic and electric wires and cables	34.93	-			-	-			-	-			-	-			-	-			-	-			34.93	-		
23	C 2363 Manufacture of ready-mixed concrete	22.72	-			-	-			-	-			-	-			-	-			-	-			22.72	-		
24	E 3811 Collection of non-hazardous waste	16.43	-			-	-			-	-		(0.01)	-			-	-			-	-				16.42	-		
25	C 2612 Manufacture of loaded electronic boards	15.89	-			-	-			-	-			-	-			-	-			-	-			15.89	-		
26	C 2015 Manufacture of fertilisers and nitrogen compounds	15.55	-			-	-			-	-			-	-			-	-			-	-			15.55	-		
27	H 5224 Cargo handling	7.60	-			-	-			-	-			-	-			-	-			-	-			7.60	-		
28	F 4321 Electrical installation	7.73	-			-	-			-	-			-	-			-	-			-	-			7.73	-		
29	E 3600 Water collection, treatment and supply	6.42	-			-	-			-	-			-	-			-	-			-	-			6.42	-		
30	C 3030 Manufacture of air and spacecraft and related machinery	5.86	-			-	-			-	-			-	-			-	-			-	-			5.86	-		
31	C 2341 Manufacture of ceramic household and ornamental articles	4.86	-			-	-			-	-			-	-			-	-			-	-			4.86	-		
32	H 4931 Urban and suburban passenger land transport	4.65	-			-	-			-	-			-	-			-	-			-	-			4.65	-		
33	C 2815 Manufacture of bearings, gears, gearing and driving elements	3.24	-			-	-			-	-			-	-			-	-			-	-			3.24	-		
34	M 7120 Technical testing and analysis	3.16	-			-	-			-	-			-	-			-	-			-	-			3.16	-		
35	M 7112 Engineering activities and related technical consultancy	3.08	-			-	-			-	-			-	-			-	-			-	-			3.08	-		
36	F 4222 Construction of utility projects for electricity and telecommunications	2.26	-			-	-			-	-			-	-			-	-			-	-			2.26	-		

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
37	L 6832 Management of real estate on a fee or contract basis	1.44	-			-	-			-	-			-	-			-	-			-	-			1.44	-		
38	H 4910 Passenger rail transport, interurban	1.05	-			-	-			-	-			-	-			-	-			-	-			1.05	-		
39	C 2572 Manufacture of locks and hinges	0.96	-			-	-			-	-			-	-			-	-			-	-			0.96	-		
40	C 2351 Manufacture of cement	0.93	-			-	-			-	-			-	-			-	-			-	-			0.93	-		
41	C 2420 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.70	-			-	-			-	-			-	-			-	-			-	-			0.70	-		
42	C 2611 Manufacture of electronic components	0.69	-			-	-			-	-			-	-			-	-			-	-			0.69	-		
43	J 6311 Data processing, hosting and related activities	0.23	-			-	-			-	-			-	-			-	-			-	-			0.23	-		
44	C 2813 Manufacture of other pumps and compressors	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
45	C 2229 Manufacture of other plastic products	0.22	-			-	-			-	-			-	-			-	-			-	-			0.22	-		
46	H 4941 Freight transport by road	0.18	-			-	-			-	-			-	-			-	-			-	-			0.18	-		
47	C 3011 Building of ships and floating structures	0.16	-			-	-			-	-			-	-			-	-			-	-			0.16	-		
48	C 2550 Forging, pressing, stamping and roll-forming of metal; powder metallurgy	0.12	-			-	-			-	-			-	-			-	-			-	-			0.12	-		
49	C 2931 Manufacture of electrical and electronic equipment for motor vehicles	0.09	-			142.47	-			-	-			-	-			-	-			-	-			142.56	-		
50	F 4211 Construction of roads and motorways	0.07	-			-	-			-	-			-	-			-	-			-	-			0.07	-		
51	F 4299 Construction of other civil engineering projects n.e.c.	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
52	C 2825 Manufacture of non-domestic cooling and ventilation equipment	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
53	C 3317 Repair and maintenance of other transport equipment	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
54	D 3511 Production of electricity	-0.72	-			-	-			-	-			-	-			-	-			-	-			-0.72	-		
55	H 5310 Postal activities under universal service obligation	-0.05	-			2.36	-			-	-			-	-			-	-			-	-			2.31	-		
56	B 0910 Support activities for petroleum and natural gas extraction	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
57	C 1011 Processing and preserving of meat	-	-			-	-			-	-			31.67	-			-	-			-	-			31.67	-		
58	C 1012 Processing and preserving of poultry meat	-	-			-	-			-	-			86.64	-			-	-			-	-			86.64	-		
59	C 1013 Production of meat and poultry meat products	-	-			-	-			-	-			22.38	-			-	-			-	-			22.38	-		
60	C 1061 Manufacture of grain mill products	-	-			-	-			-	-			13.25	-			-	-			-	-			13.25	-		
61	C 1071 Manufacture of bread; manufacture of fresh pastry goods and cakes	-	-			-	-			-	-			0.41	-			-	-			-	-			0.41	-		
62	C 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	-	-			-	-			-	-			10.49	-			-	-			-	-			10.49	-		
63	C 1105 Manufacture of beer	-	-			-	-			-	-			2.79	-			-	-			-	-			2.79	-		
64	C 1107 Manufacture of tobacco products	-	-			-	-			-	-			168.86	-			-	-			-	-			168.86	-		
65	C 1413 Manufacture of other outerwear	-	-			-	-			-	-			0.60	-			-	-			-	-			0.60	-		
66	C 1520 Manufacture of footwear	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
67	C 1712 Manufacture of paper and paperboard	-	-			-	-			-	-			23.41	-			-	-			-	-			23.41	-		
68	C 2110 Manufacture of basic pharmaceutical products	-	-			-	-			-	-			-	-			33.74	-			-	-			33.74	-		
69	C 2120 Manufacture of pharmaceutical preparations	-	-			-	-			-	-			-	-			0.33	-			-	-			0.33	-		
70	C 3102 Manufacture of kitchen furniture	-	-			-	-			-	-			8.10	-			-	-			-	-			8.10	-		

2. GAR – Information by sector (CapEx)

Breakdown by sector - NACE 4 digits level (code and label)		Year End at 31.12.2024																											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD					
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount					
		Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (CCA)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (WTR)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (CE)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (PPC)	Mn RON	Of which environmentally sustainable (BIO)	Mn RON	Of which environmentally sustainable (CCM)	Mn RON	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		
71	C 3109 Manufacture of other furniture	-	-			-	-			-	-			23.70	-			-	-			-	-			23.70	-		
72	G 4621 Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-			-	-			-	-			1.05	-			-	-			-	-			1.05	-		
73	G 4635 Wholesale of tobacco products	-	-			-	-			-	-			2.78	-			-	-			-	-			2.78	-		
74	G 4639 Non-specialised wholesale of food, beverages and tobacco	-	-			-	-			-	-			24.85	-			-	-			-	-			24.85	-		
75	G 4645 Wholesale of perfume and cosmetics	-	-			-	-			-	-			-0.04	-			-	-			-	-			-0.04	-		
76	G 4646 Wholesale of pharmaceutical goods	-	-			-	-			-	-			2.18	-			-	-			-	-			2.18	-		
77	G 4671 Wholesale of solid, liquid and gaseous fuels and related products	-	-			-	-			-	-			0.26	-			-	-			-	-			0.26	-		
78	G 4673 Wholesale of wood, construction materials and sanitary equipment	-	-			-	-			-	-			0.49	-			-	-			-	-			0.49	-		
79	G 4674 Wholesale of hardware, plumbing and heating equipment and supplies	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
80	G 4677 Wholesale of waste and scrap	-	-			-	-			-	-			2.96	-			-	-			-	-			2.96	-		
81	G 4690 Non-specialised wholesale trade	-	-			-	-			-	-			10.11	-			-	-			-	-			10.11	-		
82	G 4711 Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-			-	-			-	-			1,384.03	0.55			-	-			-	-			1,384.03	0.55		
83	G 4719 Other retail sale in non-specialised stores	-	-			-	-			-	-			0.66	-			-	-			-	-			0.66	-		
84	G 4742 Retail sale of telecommunications equipment in specialised stores	-	-			-	-			-	-			0.37	-			-	-			-	-			0.37	-		
85	G 4752 Retail sale of hardware, paints and glass in specialised stores	-	-			-	-			-	-			42.06	-			-	-			-	-			42.06	-		
86	G 4754 Retail sale of electrical household appliances in specialised stores	-	-			-	-			-	-			92.57	-			-	-			-	-			92.57	-		
87	G 4764 Retail sale of sporting equipment in specialised stores	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
88	G 4773 Dispensing chemist in specialised stores	-	-			-	-			-	-			1.25	-			-	-			-	-			1.25	-		
89	G 4778 Other retail sale of new goods in specialised stores	-	-			-	-			-	-			2.45	-			-	-			-	-			2.45	-		
90	I 5510 Hotels and similar accommodation	-	-			1.03	-			-	-			-	-			-	-			42.39	-			43.42	-		
91	O 8425 Fire service activities	-	-			1.00	-			-	-			-	-			-	-			-	-			1.00	-		
92	Q 8690 Other human health activities	-	-			-	-			-	-			-	-			-	-			-	-			-	-		
93	G 4775 Retail sale of cosmetic and toilet articles in specialised stores	-	-			-	-			-	-			0.36	-			-	-			-	-			0.36	-		

3. GAR KPI concerning stock (Turnover)

		Year End at 31.12.2024																																
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)											
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)											
	Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling						
% (compared to total covered assets in the denominator)																																		
	GAR - Covered assets in both numerator and denominator																																	
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	9.81%	4.83%	4.80%	-	0.18%	3.35%	0.02%	-	-	-	-	-	3.87%	-	-	-	-	0.06%	-	-	-	-	0.08%	-	-	-	-	17.03%	4.83%	4.80%	-	0.18%	49.75%
2	Financial undertakings	-	-	-	-	-	-	0.09%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11.98%		
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%		
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.90%		
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.10%		
6	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	-	-	-	-	-	-	0.36%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.98%		
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.69%		
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.55%		
11	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%		
17	Loans and advances	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%		
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	Non-financial undertakings	39.31%	1.34%	1.12%	-	1.34%	2.12%	-	-	-	-	-	-	29.53%	-	-	-	-	0.49%	-	-	-	-	0.61%	-	-	-	-	71.00%	1.34%	1.12%	-	1.34%	6.52%
21	Loans and advances	38.66%	1.35%	1.14%	-	1.35%	2.14%	-	-	-	-	-	-	29.85%	-	-	-	-	0.50%	-	-	-	-	0.62%	-	-	-	-	71.76%	1.35%	1.14%	-	1.35%	6.45%
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%		
23	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	Households	9.48%	9.48%	9.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.48%	9.48%	9.48%	-	-	24.41%	
25	of which loans collateralised by residential immovable property	9.52%	9.52%	9.52%	-	-	-	-	-					-	-	-	-										2.31%	2.31%	2.31%	-	-	24.32%		
26	of which building renovation loans	-	-	-	-	-	-	-	-	-				-	-	-	-										-	-	-	-	-	-		
27	of which motor vehicle loans	-	-	-	-	-																										0.09%		
28	Local governments financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	-	6.84%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%		
32	Total GAR assets	4.88%	2.40%	2.39%	-	0.09%	1.66%	0.01%	-	-	-	-	-	1.92%	-	-	-	-	0.03%	-	-	-	-	0.04%	-	-	-	-	8.47%	2.40%	2.39%	-	0.09%	49.79%

3. GAR KPI concerning stock (CapEx)

		Year End at 31.12.2024																															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL					Proportion of total assets covered	
																											(CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)										
% (compared to total covered assets in the denominator)					Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling									
GAR - Covered assets in both numerator and denominator																																	
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	10.70%	5.35%	4.80%	-	0.70%	3.35%	0.02%	-	-	-	-	-	3.98%	-	-	-	-	0.06%	-	-	-	-	0.08%	-	-	-	18.03%	5.35%	4.80%	-	0.70%	49.75%
2	Financial undertakings	-	-	-	-	-	-	0.09%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11.98%		
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.00%		
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6.90%		
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.10%		
6	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	-	-	-	-	-	-	0.36%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.98%		
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.69%		
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.55%		
11	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%		
17	Loans and advances	-	-	-	-	-	-	17.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.06%		
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	Non-financial undertakings	46.11%	5.33%	1.12%	-	5.33%	2.12%	-	-	-	-	-	-	30.36%	0.01%	-	0.01%	0.49%	-	-	-	-	0.61%	-	-	-	78.62%	5.33%	1.12%	-	5.33%	6.52%	
21	Loans and advances	45.53%	5.38%	1.14%	-	5.38%	2.14%	-	-	-	-	-	-	30.68%	0.01%	-	0.01%	0.50%	-	-	-	-	0.62%	-	-	-	79.46%	5.39%	1.14%	-	5.39%	6.45%	
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.07%		
23	Equity instruments	-	-		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	Households	9.48%	9.48%	9.48%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9.48%	9.48%	9.48%	-	-	24.41%		
25	of which loans collateralised by residential immovable property	9.52%	9.52%	9.52%	-	-	-	-	-					-	-	-	-									2.31%	2.31%	2.31%	-	-	24.32%		
26	of which building renovation loans	-	-	-	-	-	-	-	-					-	-	-	-									-	-	-	-	-	-		
27	of which motor vehicle loans	-	-	-	-	-																									0.09%		
28	Local governments financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	6.84%		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	0.05%	-	-	-	-	22.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.36%	-	-	-	-	6.84%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.04%		
32	Total GAR assets	5.32%	2.66%	2.39%	-	0.35%	1.66%	0.01%	-	-	-	-	-	1.98%	-	-	-	-	0.03%	-	-	-	-	0.04%	-	-	-	8.97%	2.39%	2.39%	-	0.35%	49.79%

4. GAR KPI regarding flow (Turnover)

[illegible]

4. GAR KPI regarding flow (CapEx)

		Year End at 31.12.2024																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
		Of which Use of Proceeds Of which transitional Of which enabling					Of which Use of Proceeds Of which enabling				Of which Use of Proceeds Of which enabling				Of which Use of Proceeds Of which enabling				Of which Use of Proceeds Of which enabling				Of which Use of Proceeds Of which enabling									
% (compared to flow of total eligible assets)																																
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	32.31%	5.58%	5.36%	-	4.45%	8.18%	-	-	-	-	-	-	8.90%	-	-	-	0.43%	-	-	-	-	-	-	-	49.82%	5.58%	5.36%	-	4.45%	17.56%	
2	Financial undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.78%		
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.32%		
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.14%		
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%		
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3.46%		
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.59%		
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.01%		
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.41%		
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.18%		
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance undertakings	-	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	-	0.11%	
17	Loans and advances	-	-	-	-	-	17.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17.00%	-	-	-	-	0.11%	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	Non-financial undertakings	60.01%	8.57%	8.15%	-	8.57%	1.72%	-	-	-	-	-	-	17.13%	-	-	-	0.82%	-	-	-	-	-	-	-	79.68%	8.57%	8.15%	-	8.57%	13.48%	
21	Loans and advances	59.90%	8.59%	8.17%	-	8.59%	1.72%	-	-	-	-	-	-	17.18%	-	-	-	0.82%	-	-	-	-	-	-	-	79.63%	8.59%	8.17%	-	8.59%	13.45%	
22	Debt securities, including UoP	100.00%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100.00%	-	-	-	-	-	0.04%	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	Households	4.31%	4.31%	4.31%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.31%	4.31%	4.31%	-	-	6.80%	
25	of which loans collateralised by residential immovable property	4.46%	4.46%	4.46%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.46%	4.46%	4.46%	-	-	6.57%	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.23%		
28	Local governments financing	0.21%	-	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	-	1.90%	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	0.21%	-	-	-	-	99.67%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	99.88%	-	-	-	-	1.90%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.12%		
32	Total GAR assets	8.39%	1.45%	1.39%	-	1.16%	2.12%	-	-	-	-	-	-	2.31%	-	-	-	0.11%	-	-	-	-	-	-	-	12.94%	1.45%	1.39%	-	1.16%	26.08%	

5. KPI off-balance sheet exposures regarding stock (Turnover)

		Year End at 31.12.2024																							
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds			
1	Financial guarantees (FinGuar KPI)	27.55%	0.99%	0.99%	-	0.99%	3.00%	-	-	-	-	-	-	25.53%	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

5. KPI off-balance sheet exposures regarding stock (CapEx)

		Year End at 31.12.2024																							
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds				Of which Use of Proceeds			
1	Financial guarantees (FinGuar KPI)	35.10%	8.79%	0.26%	-	8.79%	3.00%	-	-	-	-	-	-	25.67%	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

6. . KPI off-balance sheet exposures regarding flow (Turnover)

		Year End at 31.12.2024																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
		% (compared to total eligible off-balance sheet assets)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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6. . KPI off-balance sheet exposures regarding flow (CapEx)

		Year End at 31.12.2024																												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
% (compared to total eligible off-balance sheet assets)				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling			
1	Financial guarantees (FinGuar KPI)	32.11%	67.11%	0.44%	-	67.11%	0.01%	-	-	-	-	-	-	10.24%	-	-	-	-	-	-	-	-	-	-	42.36%	67.11%	0.44%	-	67.11%	
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

Anexa XII

Reporting period 31.12.2024

Template 1 Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total applicable KPI	-	-	-	-	-	-

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	-	-	-	-	-	-

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	22.8	100%	22.8	100%	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	22.8		22.8			

Template 5 Taxonomy non-eligible economic activities

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-
7	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	-	-
8	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	-	-




A2

**REMUNERATION REPORT
OF BANCA TRANSILVANIA'S
MANAGEMENT BODY
IN 2025**

GENERAL INFORMATION

Banca Transilvania is a joint stock company, managed by a Board of Directors consisting of seven directors, elected by the General Meeting of Shareholders, which exercises supervisory functions and is responsible for the implementation of its decisions. Its main task is to guide, coordinate, supervise and control the Bank's activity between two General Meetings.

At the organisational level, the Bank consists of the management structure (the Board of Directors and the Leaders' Committee) and the operational structure (the head office and the units that form the territorial network). The management structure includes the management body in its supervisory function (the Board of Directors) and the senior management bodies: those that perform the management function (the Leaders/Leaders' Committee).

The senior management of the Bank is provided by individuals who exercise management functions within the credit institution and who are empowered with the day-to-day management of the credit institution and are accountable to the management body in its supervisory capacity for its performance. The senior management is represented by the Bank's Leaders.

The management body, within the meaning of the legislation applicable to this report, consists of the members of the Board of Directors and those of the Leaders' Committee (the Chief Executive Officer and Deputy Executive Officers). Both the members of the Board of Directors and those of the Leaders' Committee are considered Identified Staff within the meaning of national and European banking legislation, as well as executives within the meaning of the provisions of the legislation on issuers.

This remuneration report contains information on the remuneration paid during 2025, in accordance with the remuneration policy approved by the General Meeting of Shareholders of April 2025. Given that the remuneration policy has implemented a consolidated remuneration framework in line with sound remuneration practices in the field, this report will refer to the remuneration paid under this framework.

We note that the year-on-year variation takes into account the increase in equity in relation to Banca Transilvania S.A., combined with the expansion of the Banca Transilvania Financial Group (BTFG hereinafter) and the increase in the average trading price of TLV shares, generated by the socio-economic context caused by international political instability, including in relation to ongoing armed conflicts. During the reference period, TLV shares performed consistently well and, despite political instability at national level, BT's rating remained stable, at times exceeding the country rating.

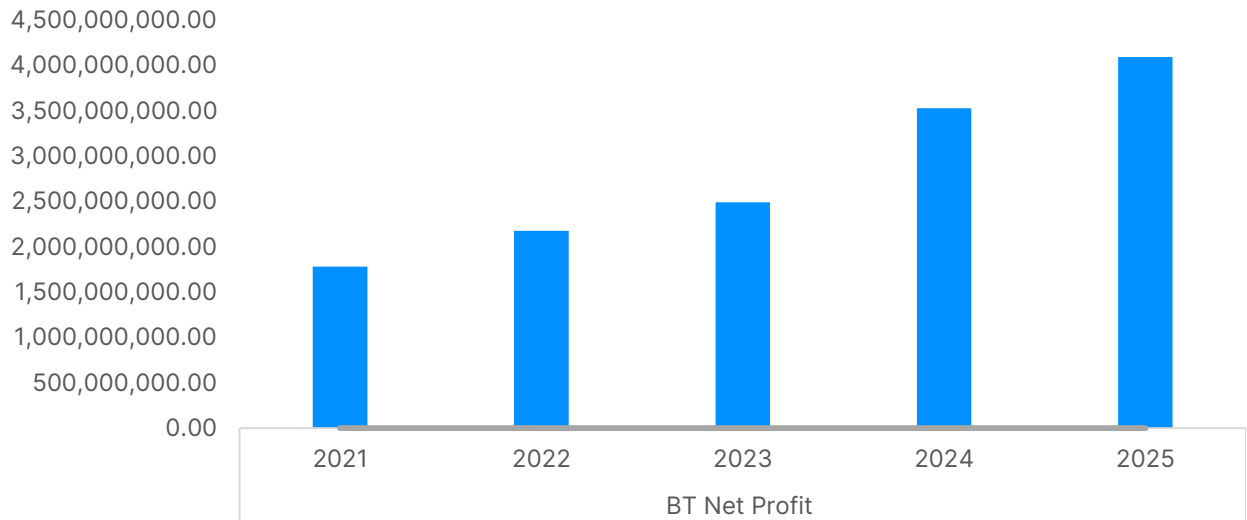
Furthermore, market opportunities were seized, resulting in consolidating BTFG's presence in both Romania and the Republic of Moldova, solidifying its leading position as a financial services provider through the acquisition of O.C.N. Microinvest S.R.L., the largest non-bank financial institution in terms of market share, by Victoriabank S.A.. The integration of OTP Bank was also completed, with its customers being taken over by BT. In addition, BTFG consolidated its position in the private pension sector through the acquisition of the entire capital of BRD Pensii S.A.F.P.P. S.A., completed in the fourth quarter of 2025.

This information can be confirmed by consulting Banca Transilvania's financial statements and the Directors' Report as of December 31st, 2025, information verified by the Risk Management Committee, the Remuneration Committee, the Board of Directors and the external auditor, adjusted for the associated risks, on the reference dates relevant to this remuneration report (December 31st, 2021; December 31st, 2022; December 31st, 2023; December 31st, 2024 and December 31st, 2025).

At the same time, we would like to point out that the YOY variation (namely from 2024 to 2025, from 2023 to 2025, from 2022 to 2025 and from 2021 to 2025) related to the remuneration of key employees at group level, represents an increase of 33.59% compared to 2024, 55.82% compared to 2023, 73.02% compared to 2022 and 101.65% compared to 2021. Regarding the issuer's non-executive employees, the evolution of the average remuneration from one year to the next (namely from 2024 to 2025, from 2023 to 2025, from 2022 to 2025 and from 2021 to 2025) represents an increase of 6.40% compared to 2024, 25.65% compared to 2023, 39.70% compared to 2022 and 58.55% compared to 2021.

Bellow you can consult the evolution of the issuers' profits, so as to allow their correlation with the whole management body's remunerations' evolution and that of Banca Transilvania's staff:

PROFIT EVOLUTION



REMUNERATION POLICY AND MECHANISMS

The remuneration policy for Banca Transilvania’s management body is reviewed periodically by the General Meeting of Shareholders, in accordance with the applicable legal provisions, the current version being approved by the General Meeting of Shareholders in April 2025.

In addition to the formal governance process, the Bank maintained a continuous and constructive dialogue throughout the year, through specific channels, with shareholders, institutional investors and voting service providers that support investors in exercising their voting rights, complying with governance standards and integrating ESG considerations into their decision-making processes. Interactions included both regular exchanges of information and ad hoc clarifications on the Bank's policies, regulatory developments and issues relevant to corporate responsibility.

During these discussions, no serious deficiencies in the defining elements of performance or significant structural objections to the Remuneration Policy, governance practices or other elements included in the documentation submitted for approval at the General Meetings were identified. On the contrary, the dialogue with shareholders facilitated and confirmed the alignment of the Bank's policies, best practices in the capital market and, in particular, with those of the banks traded on it, as well as the maintenance of a solid, transparent and responsible governance framework.

At the same time, the Bank reaffirms its commitment to constantly strengthen the process of engaging with shareholders and investors, including by expanding communication

channels, improving access to non-financial information and further integrating ESG principles into its reporting, dialogue and corporate strategy activities.

The policy establishes general principles for the management body's remuneration, in compliance with the principles set out in the applicable national and European regulations. Banca Transilvania's main objective regarding remuneration is to comply with the principle of fairness, taking into account the institution's business and risk strategy, corporate culture and values, the institution's long-term interests and the measures used to avoid conflicts of interest, without encouraging excessive risk-taking and promoting sound and effective risk management. The internal remuneration framework supports the institution in achieving and maintaining a sound capital base. When assessing the health of its capital base, the Bank takes into account its total own funds, in particular its Tier 1 own funds, and the restrictions on distributions set out in Article 141 of Directive 2013/36/EU applicable to the variable remuneration of all staff, as well as the outcome of the internal capital adequacy assessment process. Banca Transilvania regularly updates and improves its internal rules and standards to promote best practices in staff remuneration.

The periodic assessment of how the incentives offered by the remuneration system take into account risks, capital, liquidity, and the probability and timing of profits is carried out in accordance with the internal regulatory framework, taking into account compliance with the defined thresholds of relevant risk indicators, including conduct risk, as defined in the applicable internal regulations. This way, the Bank ensures a strong link between remuneration, responsibility and performance. Additionally, prior to each release of deferred tranches of financial instruments for which the Beneficiary has exercised their option, a report shall be prepared on the fulfilment of the stipulated performance criteria.

The Board of Directors is responsible for approving and maintaining the remuneration policy for the executive management body and monitoring its implementation to ensure that it is fully functional, with a view to submitting it for approval to the General Meeting of Shareholders. The Board of Directors also approves any subsequent significant exceptions to the remuneration policy granted to a member of the management body and carefully examines and monitors their effects, establishing the duration of the derogation and its justification. We note that in 2025 no exceptions to the Remuneration Policy were applied regarding any remuneration.

The Remuneration Committee's activity mainly concerns remuneration policies and practices, the remuneration of staff involved in risk management, and the adequacy of the Bank's capital and liquidity, in accordance with regulatory requirements. It analyses and ensures that the general principles and policies for staff remuneration and benefits are in line with the Bank's business strategy, values and long-term objectives. The Remuneration Committee meets at least twice a year or whenever necessary, at the request of one of its members or the Bank's executive management.

The Nomination Committee functions as an advisory committee reporting to the Board of Directors, with the role of issuing independent opinions on nomination policies and exercising the powers mandated by the Board of Directors in relation to this area.

This committee reviews and ensures that the general principles and policies regarding the suitability and nomination of members of the management bodies are aligned with the rules established by the Board of Directors, the business strategy, values, and long-term objectives of Banca Transilvania. The Nomination Committee meets at least twice a year or whenever necessary, at the request of one of its members or the Bank's Leaders.

The Risk Management Committee exercises, among other duties, specific ones in relation to the assessment of remuneration risks, namely verifying, without prejudice to the tasks of the Remuneration Committee, whether the incentives offered by the remuneration system take into account risks, capital, liquidity, and the probability and timing of profits, in order to support the establishment of sound remuneration policies and practices.

The Audit Committee, together with the Nomination Committee, the Risk Management Committee, and the internal audit function support the Remuneration Committee and are only involved in the risk audit and compliance elements of the remuneration policy to ensure their consistent application and alignment with the Bank's risk management framework, internal control system and audit principles. These bodies do not decide on any quantitative or qualitative elements of the remuneration, except from the ones indicated above.

REMUNERATION PRINCIPLES AND CRITERIA

In accordance with the legislative provisions in force regarding sound remuneration policies, there are two types of remuneration granted, namely fixed remuneration (FR hereinafter) and variable remuneration (VR hereinafter - the breakdown of its components can be consulted below, as per the individual graphs inserted in each of the corresponding sections for the persons included in this report). Remuneration is variable when it does not meet the regulatory requirements for classification as fixed remuneration. The variable part will be granted in accordance with the following principles:

- When measuring the performance of financial and non-financial indicators for the purpose of determining remuneration, both individual managerial aspects and the objectives of the Bank as a whole shall be taken into account.
- The variable component may not exceed 100% of the fixed component of the total annual remuneration.
- In order to support the establishment of sound remuneration policies and practices, the Risk Management Committee shall verify, without prejudice to the tasks of the Remuneration Committee, whether the incentives offered by the remuneration

system take into account risks, capital, liquidity, as well as the probability and timing of profits and, after verification, shall issue an advisory opinion to the Board of Directors;

- Performance assessments shall be carried out in a multi-annual framework to ensure that the assessment process is based on long-term performance and that the actual payment of performance-based remuneration components is spread over a period that takes into account the business cycle of the credit institution and the risks specific to its activity;
- The total variable remuneration does not limit BT's ability to maintain a sound capital base;
- The fixed and variable components of total remuneration are appropriately balanced, and the fixed component represents a sufficiently large proportion of total remuneration to allow for a fully flexible policy on variable remuneration components, including the possibility of paying none;
- Payments relating to the early termination of a contract reflect performance over time and are designed in such a way as not to reward failure or unprofessional conduct;
- Guaranteed variable remuneration is exceptional and occurs only in the context of hiring new staff, being limited to the first year of employment;
- Remuneration packages that are linked to compensation or the acquisition of rights under contracts concluded for previous periods of employment must be aligned with the long-term interests of the credit institution, including mechanisms for retention, deferral and clawback agreements;
- The performance measurement used to calculate the variable remuneration components or portfolios of variable remuneration components includes an adjustment for all types of current and future risks and takes into account the cost of capital and the necessary liquidity;
- The allocation of variable remuneration components within Banca Transilvania also takes into account all types of current and future risks;
- For members of the Identified Staff, at least 50% of any variable remuneration must be represented by a balanced combination of shares and, where possible, other instruments such as Additional Tier 1 own funds instruments or Tier 2 own funds instruments. Thus, at least 50% of the annual variable remuneration linked to performance is paid in BT shares, purchased by the Bank for this purpose and granted through a Stock Option Plan.
- If the annual variable remuneration granted to Identified Staff (including members of the management body) exceeds a certain amount (1.5 million RON), at least 60% of the amount is deferred for a minimal period of 5 years.

Moreover, we note that, under Romanian law, amounts received as compensation under mandate agreements are treated as salaries for tax purposes, which means that the company must withhold the amounts due to the state budget, including mandatory pension

contributions. Banca Transilvania does not ensure the payment of other contributions to any pension system, apart from those established by the national regulatory framework.

KEY POINTS REGARDING REMUNERATION

MANDATE AND MANAGEMENT AGREEMENTS

Between Banca Transilvania and members of its management – both those in supervisory roles (members of the Board of Directors) and those in executive roles (Leaders` Committee) – mandate or management agreements are concluded, drafted in accordance with the applicable legislation, internal regulations, and corporate governance best practices at both national and European level.

These agreements include, but are not limited to, the following categories of provisions:

- i) **The duration of the agreements** established in accordance with the applicable legal framework and with best practices in the corporate governance of banks and companies listed on regulated capital markets, in all cases the maximum duration being up to 4 years.
- ii) **Remuneration rights and benefits** related to the mandate, integrated into the Bank's annual remuneration process and aligned with the performance indicators (KPIs) as detailed in this report. The contractual clauses include, without being limited to:
 - **Reimbursement or coverage of expenses** incurred in the interest of the business, such as travel expenses, in accordance with the Internal Regulations and applicable internal procedures;
 - **Provisions concerning vacation bonuses** applicable to executive positions, in accordance with the Bank's remuneration policy;
 - **Logistics necessary for the performance of the mandate**, including, as necessary, an individual office, telephone, fax, computer, secretarial services, and a company car, made available for the purpose of performing the duties;
 - **Payment by the Bank of all taxes, contributions, or other tax obligations due under the relevant legislation.** Banca Transilvania does not provide for the payment of other contributions to the pension system, apart from those established by the national legal framework.
 - Payments that may be owed by the Bank to managers or directors whose agreements are terminated, by virtue of such termination (termination payments), are exceptional in nature, limited to a period of no more than 6 months and are determined on a case-by-case basis by the Board of Directors and the Remuneration Committee at the time of contract termination. Such payments, where applicable, are strictly linked to

performance throughout their tenure and will not reward failure or unprofessional conduct.

Besides the aspects above and those that constitute the subject matter of the present report, we point out that there are no other non-wage benefits provided for Banca Transilvania's Leaders or Directors.

iii) Clauses ensuring a predictable succession framework:

- **Confidentiality clause**, applicable throughout the term of the mandate and after its termination, so that the Bank can ensure good governance of internal information and a responsible information flow that does not harm its shareholders or investors.
- **Exclusivity clause**, applicable for a period of between **3 and 6 months after the termination of the contract**, under the conditions provided for in the contract (e.g. activation conditional on the Bank's decision and, where applicable, the payment of compensation), in accordance with the institutions provided for by Romanian law. This provision ensures a predictable framework for the candidate's professional career, limiting any disputes after the termination of the contract between the Bank and the Leader or director, as the case may be.
- **Non-compete and Prohibitions**, relating to the conduct of competing activities, the holding of incompatible positions, etc.
The purpose of these restrictions is to ensure the loyalty of the director or Leader concerned throughout their term of office, so that any possible derogations from these restrictions are directly approved and monitored independently. With regard to non-competition clauses, compliance with them is of essential importance in the context of executive management responsibilities, in particular, as they may have a direct impact on conflicts of interest, which are governed by a strict regulatory regime.
- **Directors'/Leaders' Liability**, including provisions on the recovery of damages caused by breach of contractual or legal obligations.
- **Clauses on the protection of the Bank's intellectual property rights**, covering the protection and ownership of rights relating to materials and documents produced in the exercise of the mandate.

AVOIDING GUARANTEED AND DISCRETIONARY REMUNERATION

Banca Transilvania complies with the principles set out in national and European legislation, including prudential requirements and EBA Guidelines on sound remuneration policies that prohibit guaranteed remuneration, except in strictly limited and justified situations.

To avoid guaranteed and discretionary remuneration, the Bank:

- imposes strict, measurable, ex-ante and ex-post criteria for the award of variable remuneration, which is conditional on the company's performance and is awarded only after analysis of quantifiable criteria (KPIs developed according to the SMART methodology) – please see the section regarding *The mechanism for evaluating the performance of the management body and the structure of the performance objectives* of this Report - and is subject to ex post deferrals and risk adjustments, including malus/clawback, thus excluding the creation of expectations of rewards unrelated to performance or risk, which would only distort behavior and encourage excessive risk-taking. Therefore, the granting of variable remuneration in accordance with the provisions of this Report results in the alignment of remuneration with risks, the avoidance of conflicts of interest, and the promotion of long-term performance.
- The Banca Transilvania Board of Directors constantly monitors the avoidance of exceptions, but to date no derogations from the Remuneration Policy have been approved, no structural deficiencies have been identified, and the Policy is fully aligned with capital market practices and prudential requirements.

SIGN-ON INDUCEMENT PAYMENTS

Any sign-on inducement payments (guaranteed variable remuneration), where applicable, would be awarded exclusively in cash and only subject to the full compliance with the following conditions (in accordance with EBA/GL/2021/04):

- are granted only on an exceptional basis and on a one-off basis to the same member of executive staff;
- are granted exclusively in the context of new recruitment;
- are strictly limited to the first year of employment;
- are granted only if Banca Transilvania maintains a solid capital base;
- are subject to "malus" and "clawback" agreements, together with any additional requirements imposed by applicable law.

We note that no such bonuses were granted during 2025, and the company does not intend to grant any in the future, except in exceptional circumstances, and will publish this information in a dedicated section of the Remuneration Report.

THE MECHANISM FOR EVALUATING THE PERFORMANCE OF THE MANAGEMENT BODY AND THE STRUCTURE OF PERFORMANCE OBJECTIVES

Below, we will further detail the executive management performance components. The types of objectives that make up the final score for the performance objectives that determine variable remuneration are detailed below as well.

The performance evaluation criteria took into account a sufficient period of time to measure actual performance, using quantifiable qualitative and quantitative criteria. Leaders were assigned at least one sustainability and responsibility/ESG-related objective (where applicable). The use of such individual performance objectives ensured alignment between the Bank's remuneration practices, the interests of senior management and the Bank's overall sustainability and responsibility/ESG objectives. With regard to the approval of results, *the Working Methodology for the Approval and Evaluation of SMART* (S – Specific, M – Measurable, A – Accessible, R – Relevant, T – Time-bound) *Objectives* approved within the company sets out the criteria for evaluating the annual individual performance of the members of the Leaders' Committee. Each Leader must comply with the following rules for determining the criteria, which are ultimately approved by the Remuneration Committee:

- objectives must be correlated and related to the current year's strategy, long-term strategy and approved budget;
- they must cover the main areas of activity for which they are responsible;
- if they have an Executive Manager under their authority, then the latter's individual qualitative criteria must be consolidated into the criteria of the Leader (Chief Executive Officer/Deputy Executive Officer) for the aforementioned area of activity;
- they must meet the conditions of at least one qualitative criterion for each department subordinated to the Leader (Chief Executive Officer/Deputy Executive Officer), up to a maximum of 10 qualitative criteria, as well as a set of relevant indicators for quantifying the criteria (which can be measured quantitatively and independently);
- an exception to this rule is the Chief Risk Officer, whose performance criteria will be approved by the Risk Management Committee (RC);
- each criterion must have clear quantification rules that can be assessed by an independent entity (any unclear, vague or repetitive wording must be avoided);
- each criterion must include a clear deadline, no later than the end of the year. If a criterion can only be completed in the following year, one possibility would be to divide the criteria and set the stages and final deadline accordingly. Any criterion with a deadline that has passed by the end of the year will be rejected and will lower the assessment score in proportion to its significance;
- The summary of the stated objectives represents the Bank's strategy for the relevant area of activity during the assessment period.

The quantitative objectives were set differently depending on whether the respective Leader is responsible for the Bank's business lines or for activities with an impact on risk management, the two types of qualitative criteria not being cumulative.

With regard to the procedure for determining and approving the results, based on the established objectives, the Methodology provides a rating from 1 to 5, with 1 being *unacceptable* (the established performance level not being achieved) and 5 being *excellent* (the established performance level being exceeded). The above score is assigned to each

qualitative and quantitative criterion for each person. The overall score that determines the final rating is calculated as the average of the individual scores for each objective. It is rounded to the nearest value, while a score of .5 is rounded up. The minimum overall score for remuneration is 3, and once it is achieved, the remuneration is allocated in full, considering the ambitious nature of the targets set by Banca Transilvania and for which its Leaders, as persons with executive responsibilities, part of the issuer's management, are directly responsible and interested.

All KPIs weight the same and have the same impact on the general score for granting the variable remuneration. By not fulfilling any of their KPIs or the quantitative criteria, the Leaders' forfeit their right to receive the variable remuneration. A score of 3 signifies a 100% degree of accomplishment. Any additional points accrued above the score of 3 do not give rise to any extra level of remuneration.

The objectives of senior management mainly focused on areas related to:

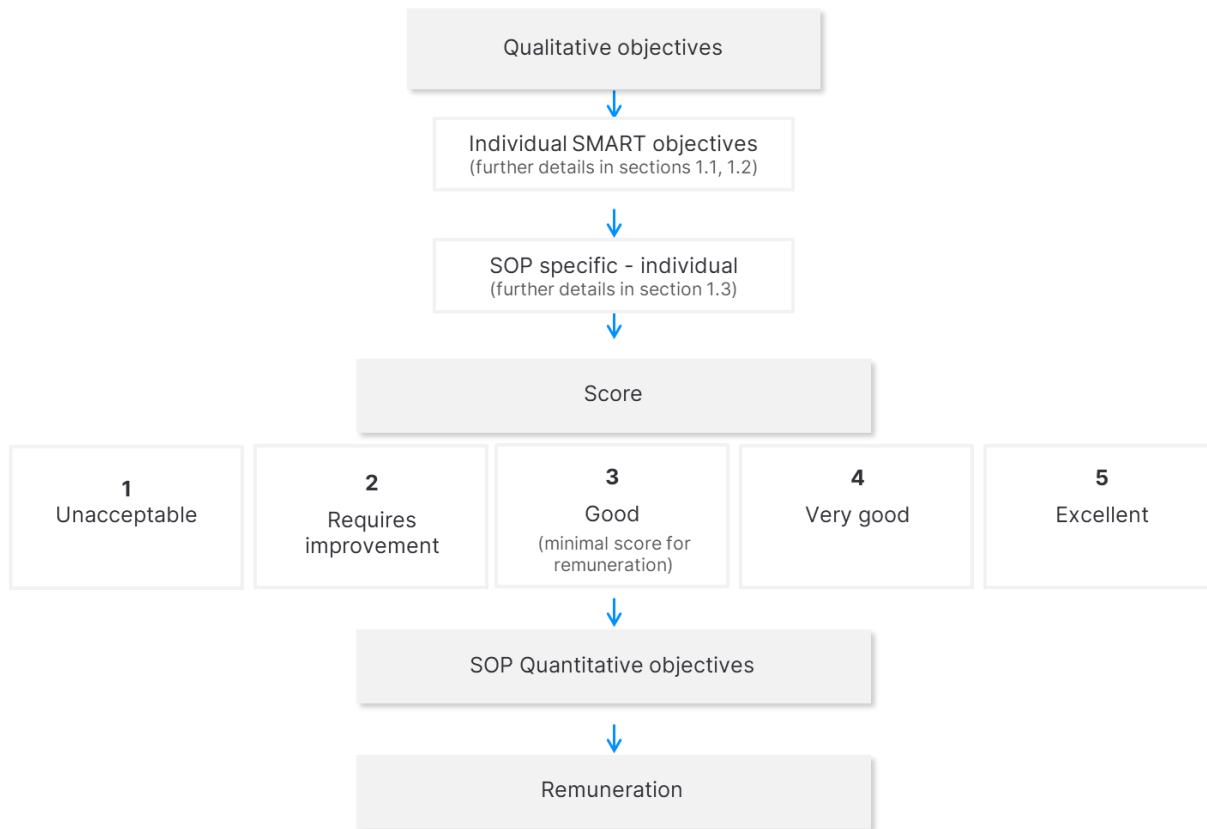
- improving service quality,
- improving capital and liquidity indicators,
- continuous digitisation of the retail and corporate sectors,
- improving the quality of the loan portfolio,
- strategic and business integration of BTFG subsidiaries, as well as optimisation of network-level processes from a corporate governance perspective,
- improving cybersecurity,
- inventorying the loan portfolio based on their carbon footprint,
- issuing MREL-eligible bonds with environmental and social components.

These objectives and their actual results are detailed below, in the chapter specific to the Leaders' Committee and their remuneration.

Thus:

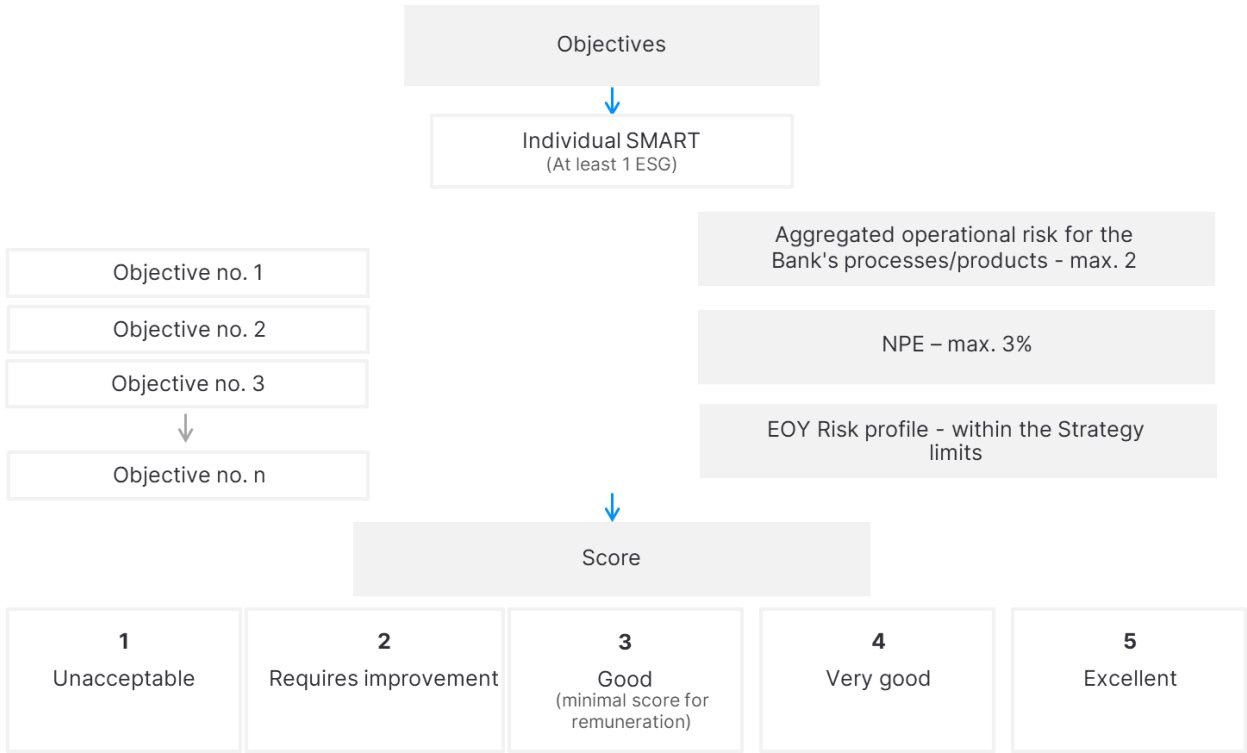
PERFORMANCE EVALUATION PROCESS

(Basis for granting variable remuneration)



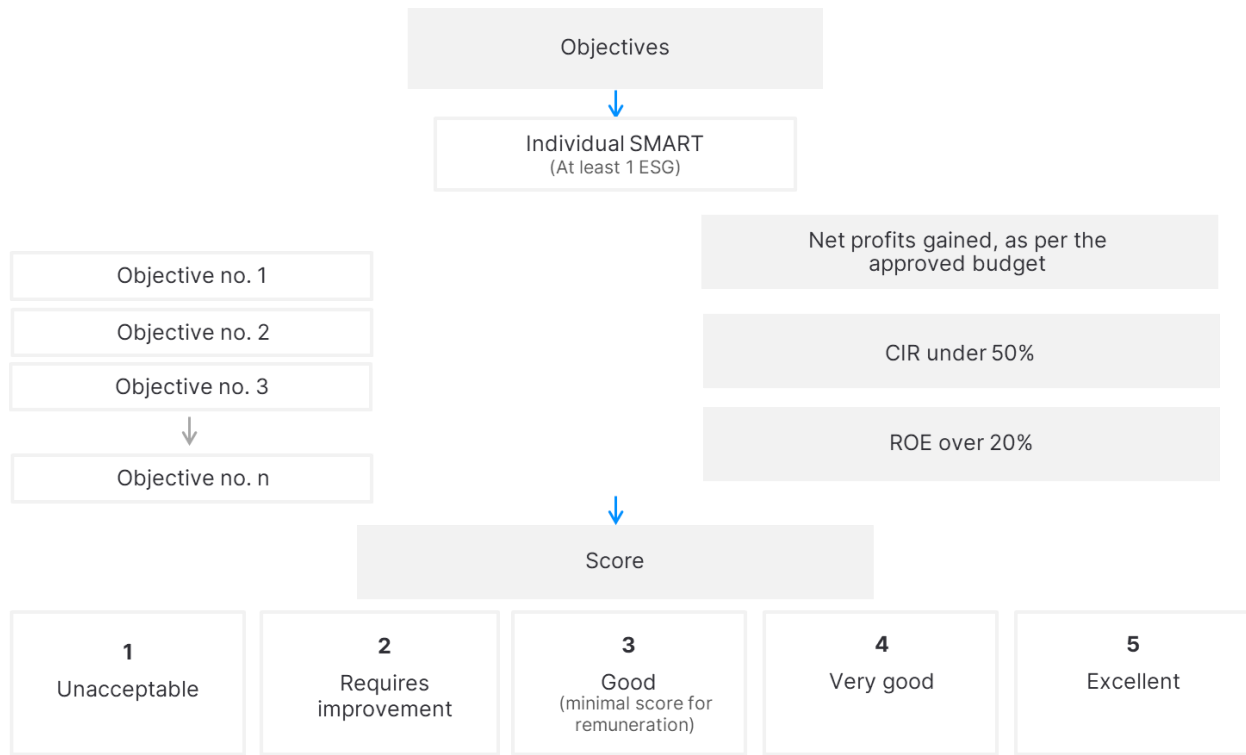
In terms of qualitative and quantitative objectives, they are differentiated according to the whether the member of the management body carries out activities in the risk or support areas, or business areas, as can be seen in the two graphs below:

1.1. Individual qualitative objectives evaluation process
(Risk related Roles)



1.2. Individual qualitative objectives evaluation process

(Business & Support Roles)



In addition to the SMART objectives mentioned above, the quantitative objectives for the Stock Option Plan must be met in order to be eligible for remuneration. For the 2024 SOP, the criteria are as follows:

1.3. SOP – Quantitative

(Cumulative targets that must be wholly met)

Attaining at least 90% of the gross profits target for 2024 (before tax). Not applicable to Leaders with Risk related Roles, who do NOT have criteria correlated with profits, in accordance with legal requirements

Maintaining capital adequacy and liquidity indicators, as well as the Bank's placement within the limits of the Bank's general risk profile as per the Risk Appetite Statement (RAS)

Maintaining the Bank within the Top 3 of the local banks' ranking from an asset perspective as of December 31st, 2024



Remuneration

For the remuneration to be paid in the current year under the stock option plan, the achievement of the quantitative objectives set will be taken into account after the analysis of the results for the individual qualitative objectives, as the former depend on the consideration of individual objectives for the granting of remuneration. These criteria are outlined in a similar manner to those for the reporting year, taking into account the evolution of the economic climate throughout the entire reference period.

We also note that the individual performance targets for the issuer's management for the financial year mainly concern:

- Increasing the contribution of subsidiaries and achieving financial targets by increasing volumes and streamlining processes.
- Maintaining a solid risk profile, with a focus on NPL, loan recovery, anti-fraud strategies and the implementation of new EBA/Basel/CSRD requirements.
- Developing and expanding green and sustainable financing.
- Accelerating digital transformation: BT Pay, BT Go, digital onboarding, automation, customer migration, digital payments and new platforms.
- Optimising operational processes, with a focus on efficiency and automation.

- Technology upgrades: reducing complexity, adopting cloud infrastructure, refining IT processes and consolidating data infrastructure.
- Team development: integrating new members, increasing skills and implementing the succession plans.
- Growth of business segments by achieving targets set in relation to portfolio, P&L and assets under management.
- Strengthening operational resilience and continuously updating the governance model in order to maintain its modern, transparent and European requirements aligned character.

The Remuneration paid in 2025 was granted based on the following KPI`s structure:

2025

Position	KPIs	Type of KPIs	Weight	Fulfilment	Evaluation
CEO	Merger execution - OTP Romania Group	Financial	11.11%	Merger fully completed; systems fully integrated; client base largely maintained by end of February 2025	100% Achieved
	Capital & MREL planning, with E and S components when it comes to bond issuance	Non-Financial (ESG)	11.11%	Completed capital buffers to support growth, and established an encouraging yield curve	
	Portfolio quality in Large Corporate sector	Financial	11.11%	Quality maintained with strong risk management	
	Digital channels	Non-Financial (ESG)	11.11%	Roadmap delivered for BT Pay new features; adoption of BT Go and the base for further development is assured.	
	Data platform (DWH)	Financial	11.11%	DWH is functional and supports both LoBs and Risk/Finance functions, more improvements are planned and/or in progress	

	Succession planning	Financial	11.11%	Successors identified; external options monitored	
	Corporate governance/ ESG, including subsidiaries management, data management and protection, while maintaining transparency with authorities and capital market participants.	Non-Financial (ESG)	11.11%	Projects achieved, with positive recognition externally; clear forward plan defined	
	People & engagement	Financial	11.11%	Key talent retained; lower-rank turnover decreased	
	Cybersecurity	Financial	11.11%	Strong external posture attained, the bank is best practice; further focus on anti-fraud protections	
Deputy CEO Legal	Remedial portfolio management	Financial	16.67%	Fulfilled as per financial reports	
	REO and Foreclosures portfolio management	Financial	16.67%	Fulfilled as per financial reports	
	Workout portfolio management	Non-Financial (ESG)	16.67%	Fulfilled as per financial reports	
	Implementing ESG specific objectives for all financial subsidiaries' units	Non-Financial (ESG)	16.67%	Fulfilled as per ESG report	100% Achieved
	Subsidiaries increase of leads by BT Network and expanding products	Financial	16.67%	Fulfilled as per financial reports	
	Merger execution and integration process - OTP Romania Group	Financial	16.67%	Responsibilities fulfilled as of end of February for the streams assigned	
CFO	Capital & MREL planning, that allows for business growth	Non-Financial (ESG)	14.29%	Cross-functional teams established to analyze MREL needs during the early stages, based on budget and forecast projections; Resulted improved forward	100% Achieved

				planning and reporting	
	Month-end close redesign	Financial	14.29%	Processes streamlined, automated, and accelerated; earlier target reached	
	Implement budgeting tool	Financial	14.29%	Implemented per plan with centralized data and automated reporting	
	ARCA use-case adoption	Financial	14.29%	Standardized ROI use, enabling prioritization discussions, aiming to internalize file analysis; streamlining operations and allocating resources more efficiently within the network.	
	Monthly consolidation for the group companies	Financial	14.29%	Data flows automated and quality improved	
	SAP FPSL	Financial	14.29%	Reconciled and implemented; parallel run initiated	
	Sustainability reporting support	Non-Financial (ESG)	14.29%	Financial support granted for ESG/CSRD taxonomy reporting; financial auditor support for review	
Deputy CEO IMM&Micro	Core lending/P&L targets SMEs / Micro	Financial	14.29%	Budgets met or exceeded across segments	100% Achieved
	Agribusiness / Healthcare divisions budgets	Financial	14.29%	Portfolio growth above plan	
	BT Microfeature Loans/P&L targets	Financial	14.29%	Targets achieved	
	BT Leasing Loans/P&L targets	Financial	14.29%	Targets achieved	

COO	ESG lending	Non-Financial (ESG)	14.29%	Group-wide production target achieved	100% Achieved
	ARCA-driven flow improvements	Financial	14.29%	Multiple simplifications, centralizations, and automation steps reducing workload fulfilled	
	BT GO	Non-Financial (ESG)	14.29%	Onboarding target achieved; migration waves prepared for execution, as per plan	
	Core system stabilization due to upgrade	Non-Financial (ESG)	11.11%	Post-upgrade stability confirmed; performance measures implemented	
	OTP Romania Group migration operations	Financial	11.11%	Prepared and executed per calendar with multiple rehearsals and load mitigations.	
	Succession for branch managers	Non-Financial (ESG)	11.11%	Successors identified; transitions and training executed	
	Green energy supply	Non-Financial (ESG)	11.11%	Consolidated sourcing: high share of green energy achieved group-wide	
	Cash strategy - operations	Financial	11.11%	Controls strengthened; coverage expanded; new center prepared	
	Head-office successors	Financial	11.11%	Candidate pool identified; professional development paths defined	
	Operational integrations	Financial	11.11%	Network and physical security functions integrated with upgraded practices	
	Cash optimization	Financial	11.11%	Limit capabilities prepared and applied; top suppliers reviewed	
	Ops performance overview	Financial	11.11%	Activity volumes (transactions) and revenues grew; market position	

				strengthened (through network and ATMs)	
Deputy CEO Retail Banking	Retail loan growth	Financial	16.67%	Target fulfilled, new production delivered; portfolio balanced through bundled protection products	100% Achieved
	Non-risk revenues & bancassurance increase	Financial	16.67%	Notable year-over-year increases in said sectors (above 10%); digital channels leveraged for grow	
	Growing Digital payments	Financial	16.67%	Multiple enhancements delivered across issuing/acquiring, security, and merchant experiences	
	Digital origination & lifecycle	Non-Financial (ESG)	16.67%	Online onboarding and origination features launched; value-added in-app services expanded	
	Sustainability:	Non-Financial (ESG)	16.67%	Digital journeys expanded; access points maintained; green products and campaigns promoted	
	Call Center digital transformation	Non-Financial (ESG)	16.67%	All planned objectives completed, including assistant, authentication, proactive support, and leads	
CTO	Merger readiness & execution of OTP Romania Group from a technology perspective	Financial	16.67%	Completed successfully. Merger successful as of 28.02.2025.	100% Achieved
	Omnichannel platform	Non-Financial (ESG)	16.67%	Scope maintained	
	Data capabilities roadmap	Financial	16.67%	Executed per plan; governance aligned to future products; competencies onboarded.	

CRO	Cards/operations resiliency	Financial	16.67%	Infrastructure improved; scope adjusted after solution limits identified	100% Achieved
	24/7 monitoring & change management	Financial	16.67%	High maturity in detection and responsiveness; change management process strengthened	
	Revised Data Center strategy for Business Continuity Planning and Disaster Recovery execution.	Financial	16.67%	Capabilities revised and tested, moving toward fuller site-to-site posture with cloud readiness	
	Risk Management Structure	Financial	33.33%	New organizational structure implemented without disruptions	
	Risk roadmap regarding EBA Stress Test and external rating exercises	Financial	33.33%	Roadmap approved; concrete actions delivered across capital, fraud, and digital risk initiatives; key external exercises set up; rating - investment grade achieved	
	ESG disclosures - Pillar 3 disclosure, CO2 footprint calculation, and CSRD contribution	Non-Financial (ESG)	33.33%	All tasks performed and delivered	

The quantitative targets are complemented by the KPI's listed above and are applicable to all members:

2025 QUANTITATIVE TARGETS

KPIs (that add to the individual criteria)	Type	Result	Evaluation of KPIs
Aggregate operational risk of the bank's processes/products - max 2	Objective for risk related individuals	1.7	Achieved
NPE - max 3%		2.40%	Achieved

Risk profile at EOY - in limits as per Strategy		In limits, as per Strategy	Achieved
Net profit reached, in accordance with budget (3.918 bln budget)	Objective for non-risk related individuals	4.095 bln profit	Achieved
CIR below 50%		44.44%	Achieved
ROE above 20%		25.23%	Achieved
Attaining at least 90% of the gross profits target for 2024 (before tax). <i>Not applicable to Leaders with Risk related Roles, who do NOT have criteria correlated with profits, in accordance with legal requirements</i>	Stock Option Plan Cumulative quantitative targets	104.52%, as per budget	Achieved
Maintaining capital adequacy and liquidity indicators, as well as the Bank's placement within the limits of the Bank's general risk profile as per the Risk Appetite Statement (RAS)		Maintained	Achieved
Maintaining the Bank within the Top 3 of the local banks' ranking from an asset perspective as of December 31st, 2024		Maintained	Achieved

SUSTAINABILITY AS A PERFORMANCE OBJECTIVE

Banca Transilvania recognises the concept of sustainability as a factor embedded in every activity and initiative, fundamental to sustainable growth, progress and the responsible conduct of our financial activities. This is why we are committed to the inclusive development of the Romanian economy through our sustained efforts to generate a positive impact on the economy and society, both within our organisation and through initiatives for our customers, which in turn multiply this impact for a healthy economy.

The Bank's sustainable approach is based on three pillars:

- People
- Performance
- Environment

We are aware that, with our leading position, we have extensive responsibilities towards our customers, but also towards the environment and the community. We therefore aim to ensure that our financing is sustainable in terms of its impact on the environment,

supplementing traditional analysis with customer environmental compliance assessments regarding environmental protection and employee health and safety.

In this complex process of defining and integrating sustainability standards, we take into account all stakeholders:

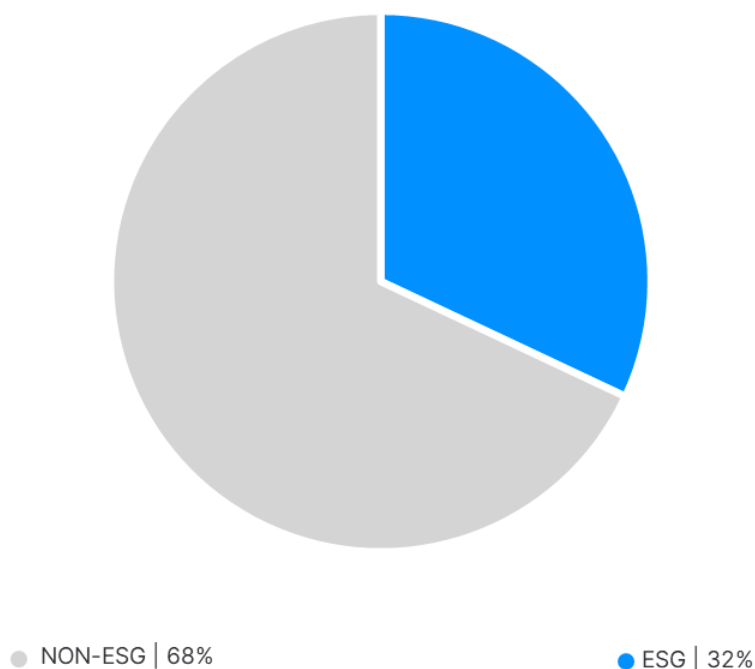
- Shareholders,
- Authorities,
- Employees,
- Customers,
- Partners/suppliers,
- Media,
- Online communities (social media),
- Organisations, foundations, associations,
- Investors/analysts, financial institutions,
- Future customers,
- Future employees.

Equally important, responsible lending means a mission to improve the population's access to finance, increase the degree of financial intermediation and support social and economic inclusion through our active involvement in financial literacy for the population, entrepreneurs and small, medium and large enterprises.

Consequently, in order to assess the performance of the issuer's management body, in addition to the specific objectives, specific ESG criteria (KPIs) have been integrated into the process of assessing its individual and collective suitability, including at Board Committees' level, with regard to both objectives and the reporting process. The addition of new objectives within this assessment will ensure better ongoing verification of the management body's expertise, so as to reflect relevant changes in the institution's activities, sustainability/ESG strategies and risk profile. We note that the granting of remuneration depends 100% on the achievement of these ESG objectives, set as KPIs in this regard.

The overall share of ESG objectives in the total SMART objectives set for 2024 by the management body and for which remuneration was paid in 2025 is as follows:

ESG V. TRADITIONAL OBJECTIVES WEIGHT - 2025



Complementary to setting performance targets for each member of senior management, sustainability and sustainable development criteria were also set, as follows, but not limited to:

- reducing greenhouse gas emissions,
- green and sustainable loans, assessing the loan portfolio from a carbon emissions perspective,
- increasing the share of renewable energy in total consumption,
- continuous implementation of digital flows, launch of new sustainable products, reducing paper consumption,
- customer campaigns with a social component,
- gender pay gap methodology
- issuance of MREL-eligible bonds with an environmental and social component,
- facilitating user involvement in civil society and charitable activities,
- adapting digital infrastructure from an accessibility perspective, etc.

This integration of at least one specific ESG criterion (KPI) into the list of individual performance targets set for each member of senior management was carried out in order to determine the amount of variable remuneration paid. Each of these individual criteria related to the ESG objectives set within the Leader's activity sector and expertise, thus ensuring that remuneration is aligned with the Bank's sustainability objectives, facilitating organic growth in ESG initiatives to achieve specific sustainability objectives.

For the current financial year, the issuer aims to accelerate the integration of ESG principles into all operational and strategic processes, strengthening its commitment to sustainability, social responsibility and sound corporate governance. This is reflected in the management's proposed SMART ESG targets for 2026, which refer, among others, to:

- continuous development of green and sustainable lending,
- reducing the carbon footprint and streamlining IT infrastructure,
- expanding the range of products & campaigns provided on digital channels (e.g. through apps),
- financial inclusion and accessibility through inclusive and secure products,
- improved customer experience & user-centred services,
- robust security risk management (especially cybersecurity and data protection),
- operational efficiency, transparency and control,
- acceleration of digital transformation with an impact on internal governance (to optimise resource consumption).

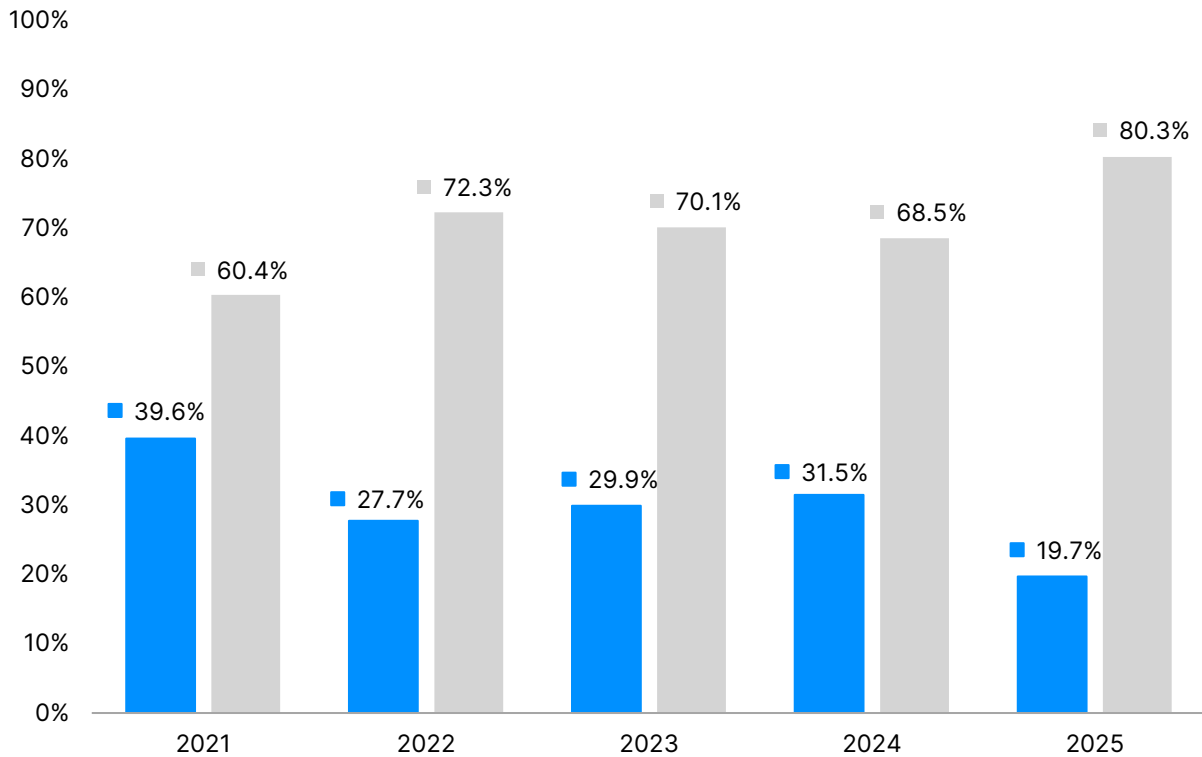
Moreover, in the context of the sustainability statement, drafted in accordance with ESRS standards, **the total annual remuneration report is an essential indicator for assessing pay inequalities and promoting transparency within an organization.** This report is derived by comparing the total annual remuneration of the highest-paid employee in the company with the median remuneration, calculated based on the remuneration of all employees, excluding the remuneration of the highest-paid employee. This approach allows companies to highlight internal pay differences, and according to ESRS standards, it is essential that this information be presented in a transparent manner, thus ensuring accountability to stakeholders. In addition, the report provides a detailed perspective on pay equity and can support strategies to reduce internal inequalities, in line with the company's sustainability objectives and equal opportunity policies. The results at individual and consolidated level are presented below:

Date	Median	Ratio (determined according to ESRS)
31.12.2025	176.656	86,5508
31.12.2024	157.166	82,0833

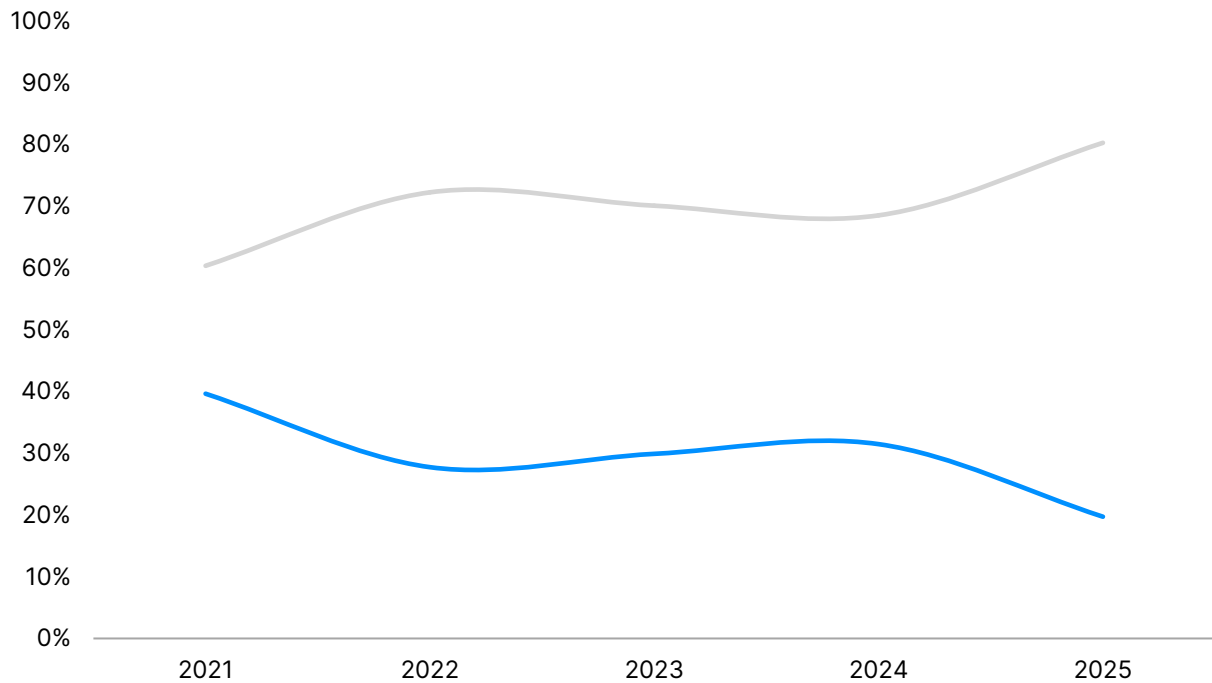
PRELIMINARY REPORT ON THE CONSOLIDATED LEVEL OF REMUNERATION OF THE MANAGEMENT BODY IN RELATION TO THE MAIN RELEVANT INDICATORS

The evolution of the remuneration paid to the members of Banca Transilvania's management body in relation to the total number of shares repurchased and allocated through the Stock Option Plan can be seen below

SOP SHARES ALLOCATION - COMPARATIVE EVOLUTION FOR MANAGEMENT V. OTHER EMPLOYEES



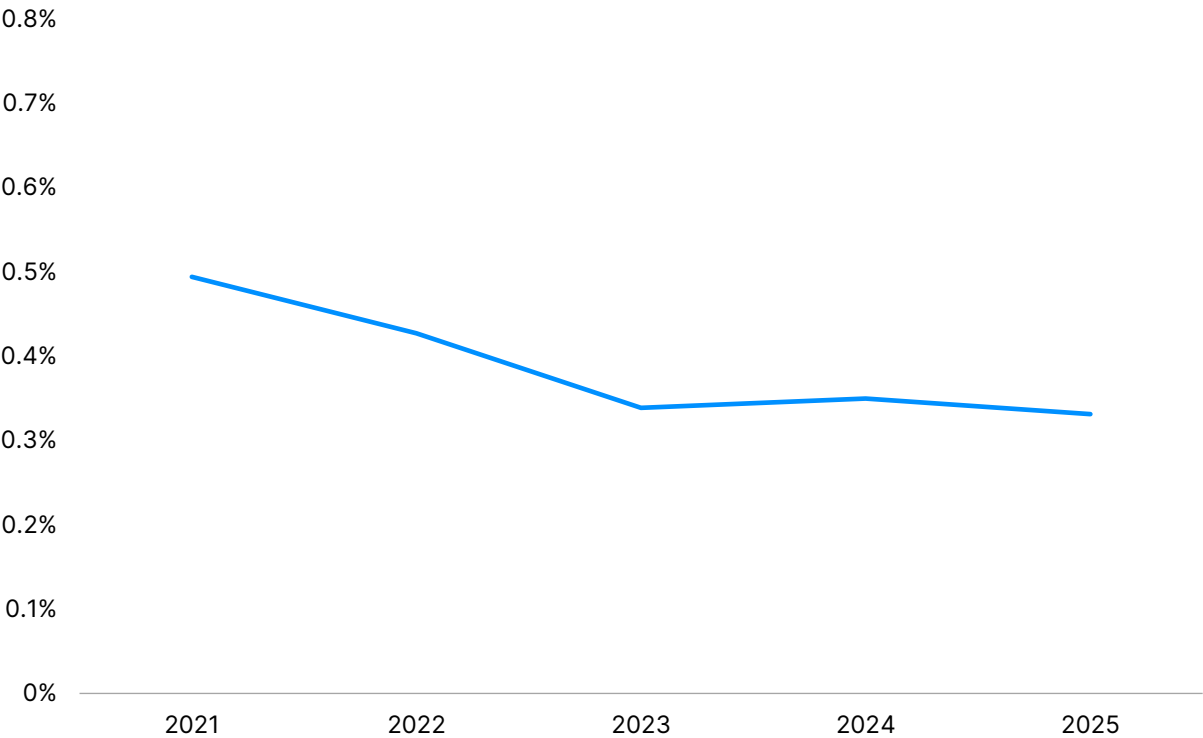
EVOLUTION OF TLV STOCK COMPENSATION - MANAGEMENT V. OTHER EMPLOYEES



We would like to point out that the TLV share buyback program and their allocation in the Stock Option Plan are fully compliant with the approval received from shareholders through the Resolution of the Extraordinary General Meeting of April 25th, 2024, namely with respect to the maximum limit of 6,500,000 TLV (0.81% of the total shares comprising the share capital) with a nominal value of 10 lei/share at a minimum price equal to the market price on the Bucharest Stock Exchange at the time of purchase and a maximum price of 38 lei, for a maximum period of 18 months from the date of publication of the EGMS Resolution in the Official Gazette of Romania, Part IV). We note that during the period for which the shares are held by the Bank, the related voting rights are suspended, in accordance with the applicable legal provisions.

Additionally, we mention that the additional remuneration of the management body is approved annually by the General Meeting of Shareholders, with a maximum limit being set. The following graphs show the evolution over time of remuneration in relation to the limit indicated above, with the remuneration paid being consistently and significantly below the maximum remuneration limit approved by the GSM, and there being no risk of excessively high remuneration being paid.

FR EVOLUTION WITHIN THE MAXIMUM REMUNERATION LIMIT SET BY THE GMS (2021 - 2025)

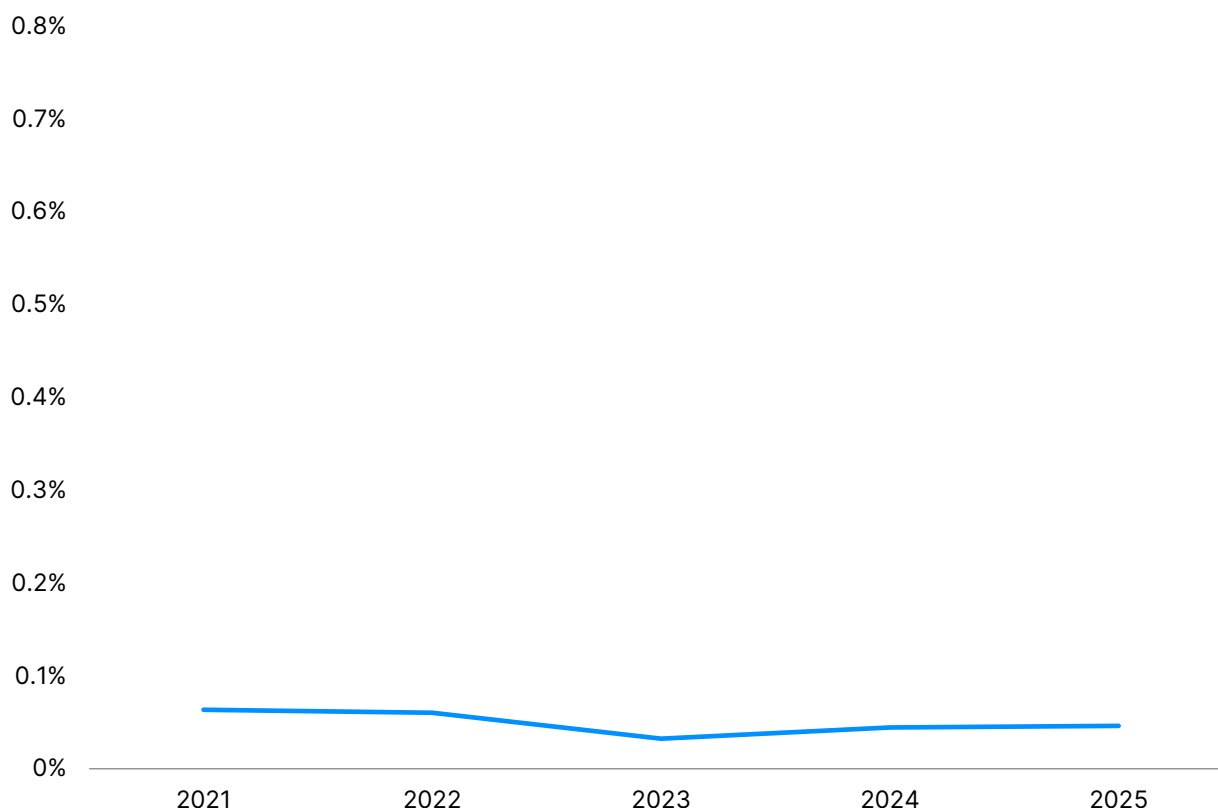


The percentage represented by the fixed remuneration (RF) in the chart above refers to the maximum remuneration limit set at the General Shareholders' Meeting, the value of which is determined by reference to the issuer's own funds as at the reference date,

December 31st, 2024, which is taken into account by the General Shareholders' Meeting when approving the aforementioned limit.

As can be seen in the chart above, fixed remuneration has not increased significantly from year to year, and Banca Transilvania does not intend to increase significantly. We note in general terms that the fixed remuneration of the supervisory body increased by 17% compared to 2024, and in relation to the executive management, fixed remuneration increased also by 17% compared to 2024.

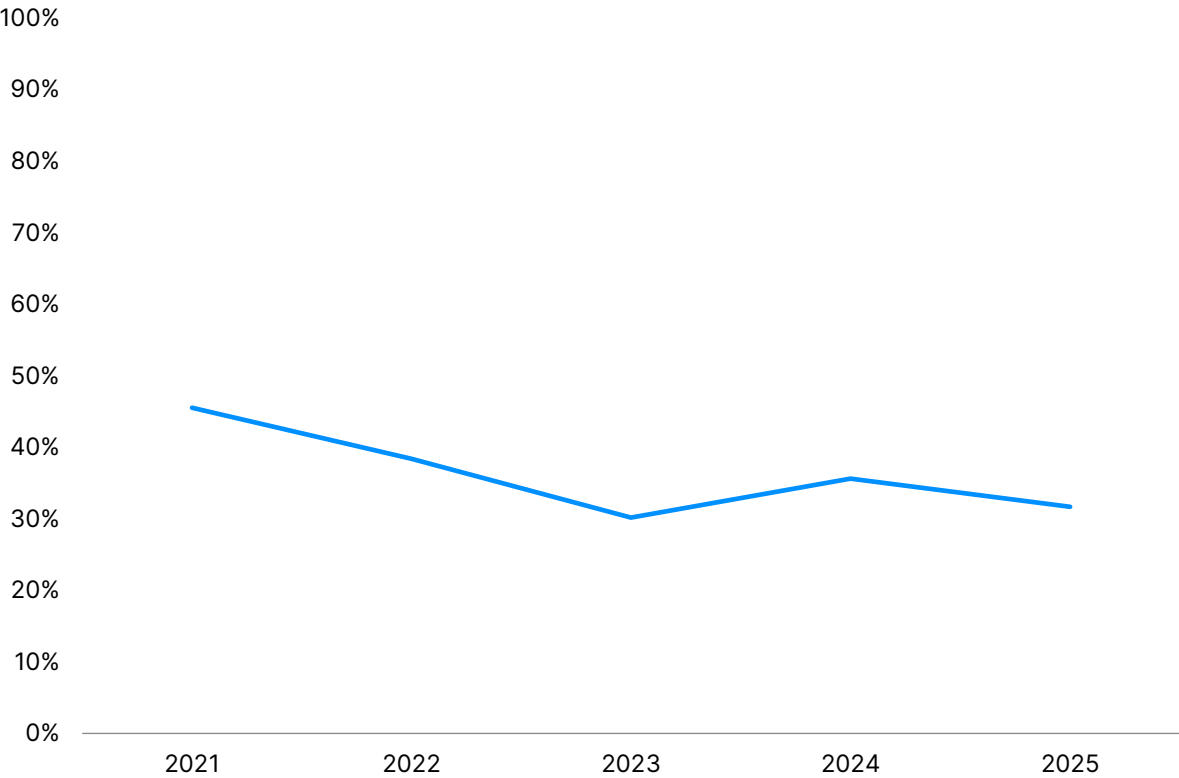
VR EVOLUTION WITHIN THE REMUNERATION LIMIT SET BY THE GMS (2021 - 2025)



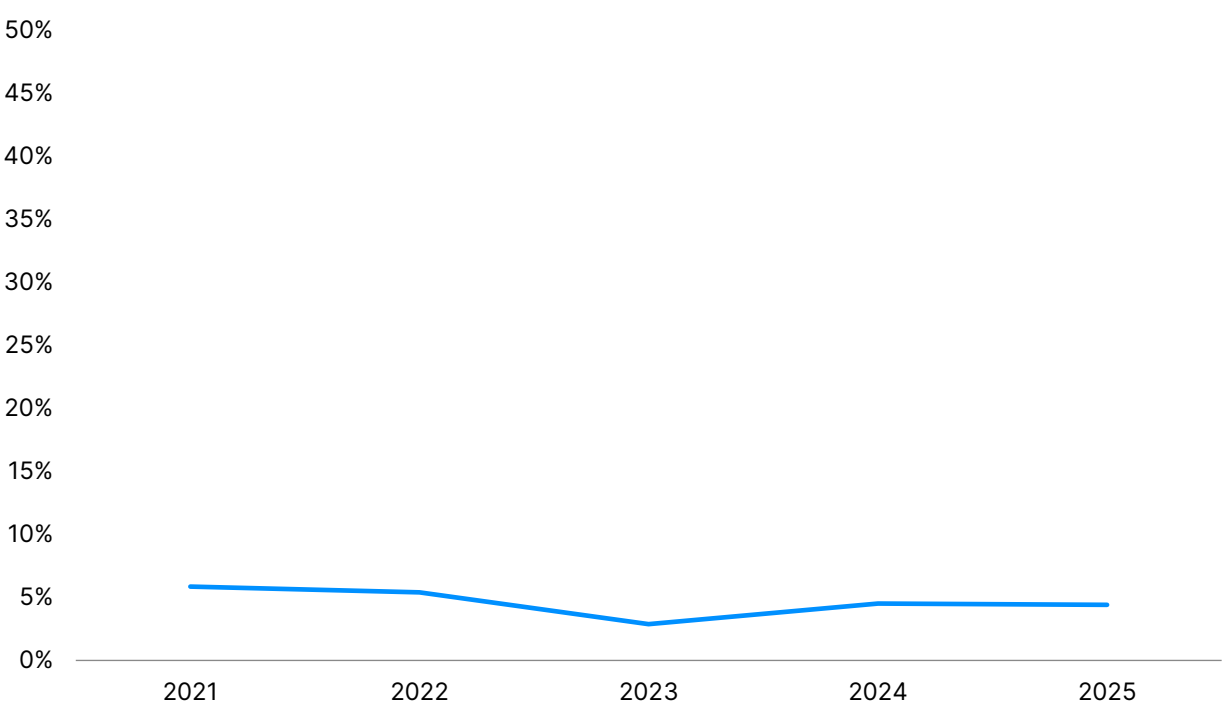
The percentage represented by the variable remuneration (VR) in the chart above refers to the maximum remuneration limit set by the General Meeting of Shareholders, the value of which is determined by reference to the issuer's own funds on the reference date, December 31st, 2024.

Compared to the remuneration paid to key positions within the Banca Transilvania Financial Group, the remuneration of the management body constantly remained close to minimum levels in order to ensure balance of remuneration at group level. See below the graph representing total fixed and variable remuneration evolution:

FR OUT OF TOTAL KEY POSITIONS REMUNERATION PAID WITHIN THE BTFG



VR OUT OF TOTAL KEY POSITIONS REMUNERATION PAID WITHIN THE BTFG



Details on the specific evolution for each member of the management body will be provided in the specific section, where a dashboard presenting both the current composition of remuneration and its evolution over time will be included.

REMUNERATION OF THE MEMBERS OF THE BOARD OF DIRECTORS

The fixed cash remuneration (allowance) level for members of the Board of Directors is established by the Resolution of the General Meeting of Shareholders, which takes place once a year, in compliance with the applicable legal provisions regarding the disclosure of GMS resolutions. The composition of Banca Transilvania's Board of Directors as of December 31st, 2025 is as follows:

MEMBER	FUNCTION	PERSONAL DATA
HORIA CIORCILĂ Date of first election: April 2002 Current Term: April 2022 – April 2026 Non-executive director	Chairman of the Board of Directors, Member of RemCO (M1)	Cluj-Napoca Polytechnic Institute, Faculty of Automation and Computers. CV, including information about current positions held in other companies, here
THOMAS GRASSE Date of first election: April 2014 Current Term: April 2022 – April 2026 Independent non-executive director	Vice-Chair of the Board of Directors, Chairman of the Risk Committee, Member of the Audit Committee (M2)	Bankakademie Frankfurt- Business School of Finance and Management. CV, including information about current positions held in other companies, here
IVO GUEORGUIEV Date of first election: April 2014 Current Term: April 2022 – April 2026 Independent non-executive director	Member of the Board of Directors, Chairman of the Audit Committee, Member of the Remuneration Committee (M3)	MBA, University of Alberta, Edmonton, Canada. CV, including information on current positions held in other companies, here

VASILE PUȘCAȘ

Date of first election:
April 2012

Current Term: April 2022 – April 2026

Independent non-executive director

Member of the
Board of
Directors,
Chairman of
RemCO (M4)

PhD in History, Faculty of
History and Philosophy, Babeș-
Bolyai University Cluj- Napoca.
CV, including information about
current positions held in other
companies, [here](#) .

MIRELA BORDEA

Date of first election:
April 2017

Current Term: April 2022 – April 2026

Independent non-executive director

Member of the
Board of
Directors,
Member of the
Audit Committee
(M5)

Department of Economic
Relations, Specialisation in
Foreign Trade, Bucharest
Academy of Economic Studies.
CV, including information about
current positions held in other
companies, [here](#)

**LUCYNA STANCZAK
WUCZYNSKA**

Date of first election:
April 2022

Current Term: April 2022 – April
2026

Independent non-executive director

Member of the
Board of Directors
Member of the
Risk Committee
(M6)

Postgraduate studies –
Advanced European Studies at
the College of Europe, Bruges,
Belgium, Economics and
European Integration. CV,
including information on current
positions held in other
companies, [here](#)

FLORIN PREDESCU VASVARI

Date of first election:
April 2022

Current Term: April 2022 – April 2026

Independent non-executive director

Member of the
Board of
Directors,
Chairman of
NomCO, Member
of RC (M7)

PhD in Accounting, Rotman
School of Management,
University of Toronto, Canada
(Specialisation in Finance and
Econometrics). CV, including
information about current
positions held in other
companies, [here](#) .

*Board of Directors; RemCO = Remuneration Committee; NomCO = Nomination Committee; RC = Risk Management Committee; AC = Audit Committee;

In accordance with the legal provisions regarding sound remuneration policies, the members of the management body in its supervisory function (Board of Directors) will be remunerated exclusively with fixed remunerations, precisely in order to adequately address conflicts of interest and remove potential incentive mechanisms based on the institution's performance (taking into account the guidelines of the European Banking Authority - EBA).

At the same time, in the case of listed banks, the EBA's recommendation is that remuneration should consist in a significant proportion of financial instruments, not just cash, thus also complying with the above-mentioned authority's requirements regarding the adjustment of remuneration to risks.

The fixed remuneration of the members of the Board of Directors was paid both in cash and in Banca Transilvania (TLV) shares granted through a stock option plan (fixed shares) that will fall within the maximum total quotas approved by the General Meeting of Shareholders for the additional fixed remuneration for directors and executive officers (0.8% of own funds at the reference date).

Regardless of the form of fixed remuneration (cash or shares), it is not linked, nor dependent on the performance of the credit institution, and there are no conditions or reductions/increases in the level of remuneration as a direct result of any performance achieved by directors individually or participation in a certain number of meetings during a certain period, but on the actual effort made in fulfilling their duties and responsibilities, with the diligence and commitment necessary in consideration of the supervisory function they perform. Thus, in order to ensure effective supervision, the fixed remuneration of the members of the Board of Directors is determined annually in accordance with the remuneration principles, taking into account their duties and the complexity of their work, by reference to the fixed additional remuneration matrix (grid). These criteria are based on the expertise of the person concerned, with examples including banking, risk management and capital markets, willingness to learn and continuous improvement in the performance of duties within the scope of their mandate, as well as proven complex analytical skills and know-how, especially in dynamic areas such as corporate governance and best practices in this field. Once the annual remuneration has been established, it cannot be unilaterally changed or adjusted, being guaranteed in a similar way to a salary in the case of an employment relationship.

In accordance with the provisions of the mandate agreement, this policy and the applicable legal provisions (Romanian and European), the director shall only receive fixed remuneration, consisting of a fixed monthly remuneration and additional fixed remuneration. In order to fulfil the specific obligations of the mandate, the members of the Board of Directors shall be provided with technical equipment (laptop, telephone, etc.) and means of transportation and/or reimbursement of transportation costs incurred are made available to members of the Board of Directors in order to fulfil their specific duties to the highest degree, in conjunction with the conclusion of an individual *Directors and Officers Liability Insurance* policy, in accordance with the applicable legal provisions on companies.

The fixed monthly remuneration is paid in lei, and the additional remuneration of the members of the Board of Directors is allocated within the Stock Option Plan. The additional

remuneration was granted in compliance with the legal provisions regarding the mechanism for classifying shares in the Stock Option Plan and the requirements of the EBA guidelines.

The level of remuneration (including the level of additional remuneration) is proposed or subsequently adjusted, based on economic conditions, by the Remuneration Committee, issued an opinion by the Risk Management Committee and approved by decision by the Board of Directors. The latter may modify the level of remuneration proposed by the Remuneration Committee with a qualified majority of two-thirds of the members of the Board. In any and all cases, the Board of Directors may not approve a total level of remuneration that exceeds the maximum limits approved annually by the General Meeting of Shareholders.

The amount of additional remuneration was reviewed in 2025 by the Board of Directors, following a proposal by the Remuneration Committee and based on the opinion of the Risk Management Committee. In accordance with the applicable legal provisions, the amount of additional remuneration is determined in cash, with the actual payment of remuneration being made in the form of shares, by allocating them to the director under the Stock Option Plan.

Thus, the evaluation process for determining the additional remuneration, within the limits and in accordance with the principles established by the General Meeting of Shareholders, was successfully completed, without any identified situations during the supervisory activity of the Board of Directors that would require any adjustments.

Therefore, for 2025, the total fixed remuneration granted to the Board of Directors represented 13.09% of the total remuneration paid to persons holding key positions within the Group (compared to 14.93% in 2024¹, 13.14% in 2023², 16.27% in 2022³ and 20.64% in 2021⁴), according to the annual financial statements as of December 31st, 2025, including the additional remuneration approved by the General Meeting of Shareholders.

Thus, the total gross fixed remuneration, granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders on April 25th, 2025 and received by a member of the Board of Directors who also serves as a member of the Risk Committee (M6) and who was elected to the Board of Directors on 28th of April 2022 as a result of the Ordinary General Meeting of Shareholders, represented 1.16% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in

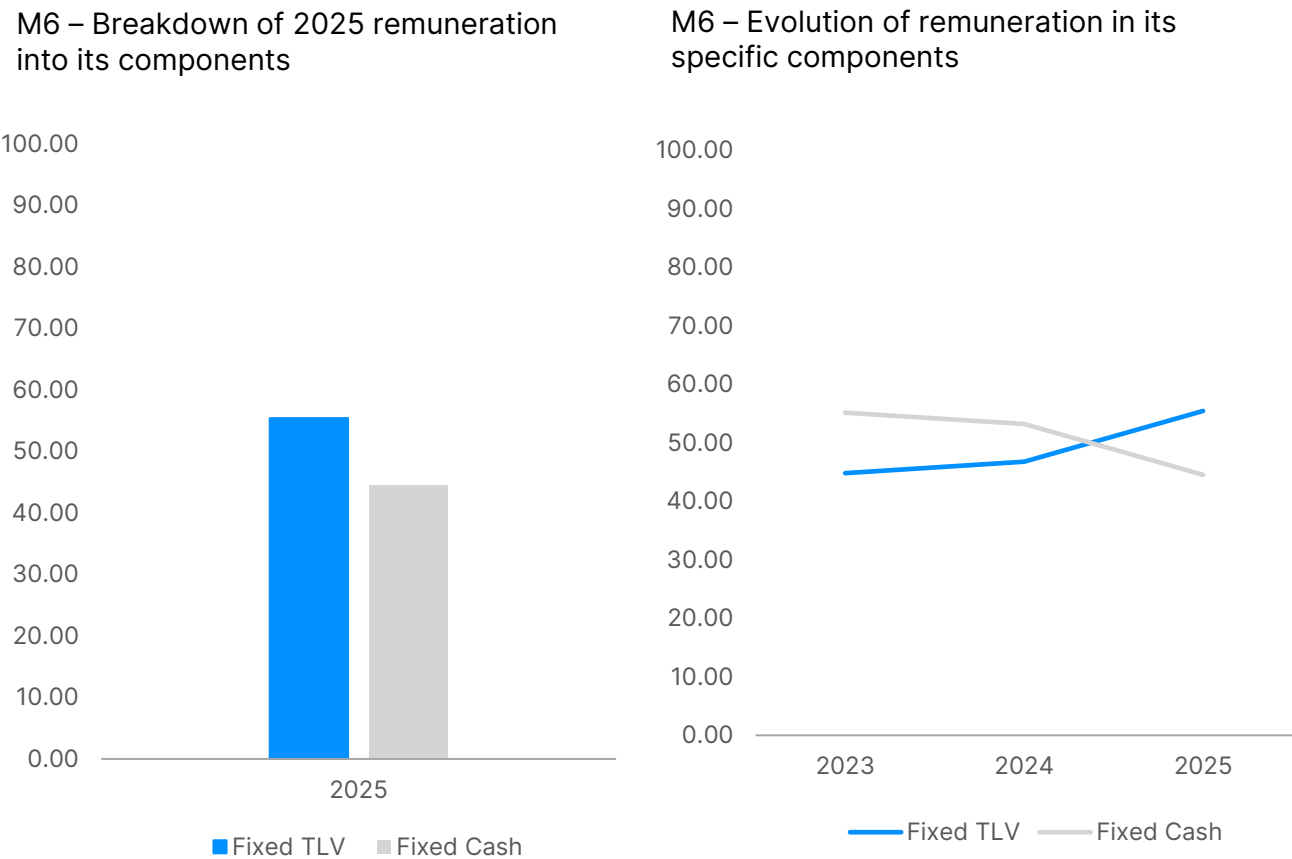
¹ See the information contained in the remuneration report for 2024, available [here](#), starting on page 17.

² See the information contained in the remuneration report for 2023, available [here](#), starting on page 170.

³ See the information contained in the remuneration report for 2022, available [here](#), starting on page 172.

⁴ See the information contained in the remuneration report for 2021, available [here](#), starting on page 120.

relation to the issuer's own funds as of December 31st, 2024⁵ (compared to 1.21% for 2024, 1.56% for 2023, 0.16% for 2022; there is no comparison for 2021) and 0.88% of the total remuneration paid to persons holding key positions within the Group⁶ (compared to 0.99% for 2024, 1.11% for 2023, 0.11% for 2022; there is no comparison for 2021).



⁵ Remuneration paid during 2025 will be assessed as within limits based on the issuer's own funds as presented in the end of year financial statements as of December 31st, 2024, the same level taken into account during the April 25th, 2025 GMS that approved additional remuneration.

⁶ Pertaining to the 2025 remuneration.

Furthermore, they did not receive any variable remuneration in any form, in accordance with the principles mentioned above, and within the BTFG, they did not receive any other gross fixed remuneration in cash and/or other instruments, specifically granted to members of the management bodies of BT subsidiaries. The additional fixed remuneration determined in cash and paid in shares represented 0.41% of the number of shares allocated in the SOP programme and paid during 2025 (compared to 0.58% for 2024, 0.84% for 2023, no comparison available for 2021 and 2022), respectively 0.64% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 0.57% for 2024, 0.70% for 2023, there is no comparison for 2021 and 2022, given that they were only elected to the Board of Directors on 28th April 2022 as a result of the Ordinary General Meeting of Shareholders, with approval by the authorities and the actual start of activity taking place at a later date). Last but not least, the variation in total remuneration was represented by an increase of 19.50% compared to 2024 (compared to an increase of 23.86% compared to 2023, and an increase of 1247.13% compared to 2022, a year in which the mandate was exercised for only 2 months; for 2021, there is no comparison, given that they were elected on the Board of Directors only on 28th April 2022 as a result of the Ordinary General Meeting of Shareholders, with approval by the authorities and the actual start of activity taking place at a later date).⁷ The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

The Remuneration Committee reviews and ensures that the general principles and policies for staff remuneration and benefits are in line with Banca Transilvania's business strategy, values and long-term objectives.

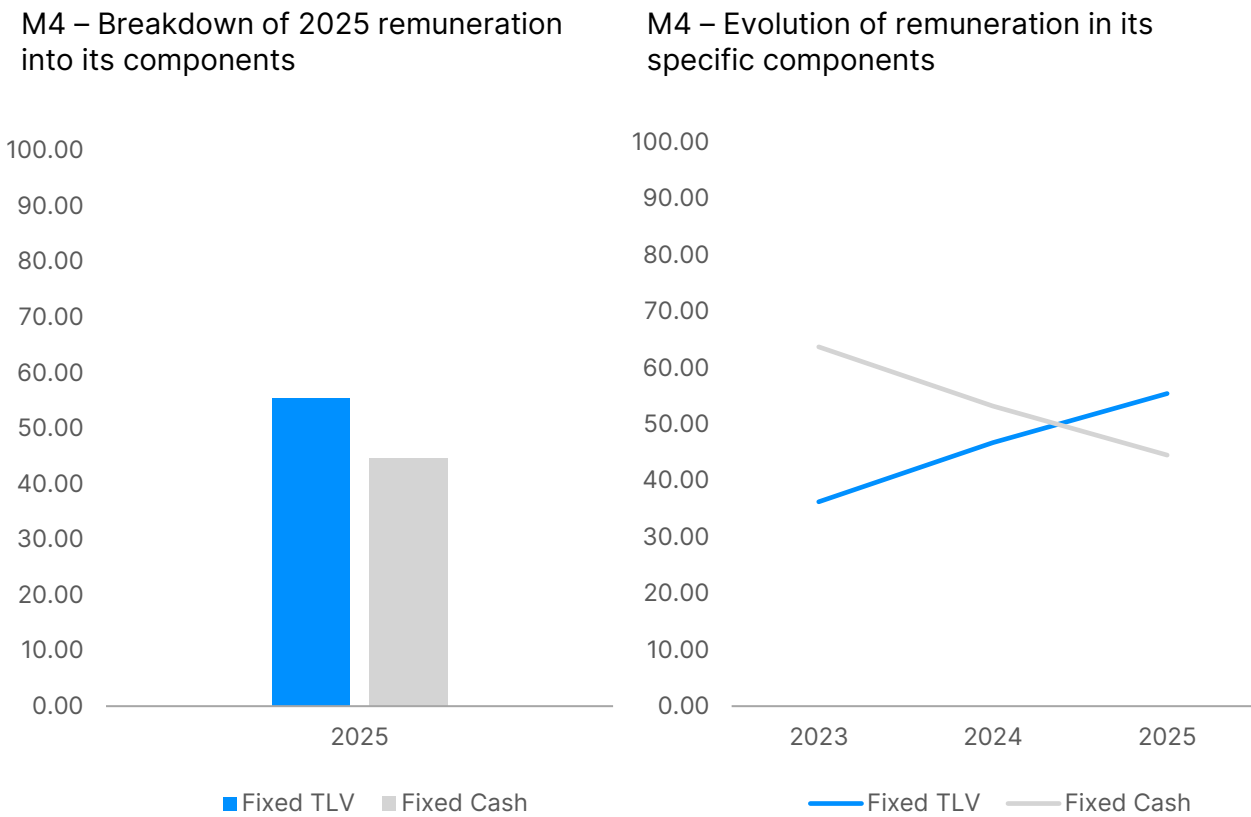
The Remuneration Committee at the date of this report consists of the following:

- Chairman of the Committee (M4);
- 2 Members of the Board of Directors (namely the Chairman of the Board of Directors (M1) and the Chairman of the Audit Committee (M3)).

In this regard, the total gross fixed remuneration, granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025 and received by the Chairman of RemCO (M4) represents 1.16% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 1.21% for 2024, 1.35% for 2023, 1.65% for 2022 and 1.92% for 2021, taking into account the data for the corresponding reporting periods), relative to the issuer's equity calculated on December 31st, 2024, and 0.88% of the total remuneration paid to persons holding key positions within the Group (compared to 0.99% for 2024, 0.96% for

⁷ Given that the first reporting year for the present report is 2022, and according to the GMS approved Remuneration Policy (initially in 2021 and afterwards again in 2025), there is no comparable data available in terms of remuneration and its variation for 5 previous financial years.

2023, 1.19% for 2022 and 1.41% for 2021, taking into account the data for the corresponding reporting periods).

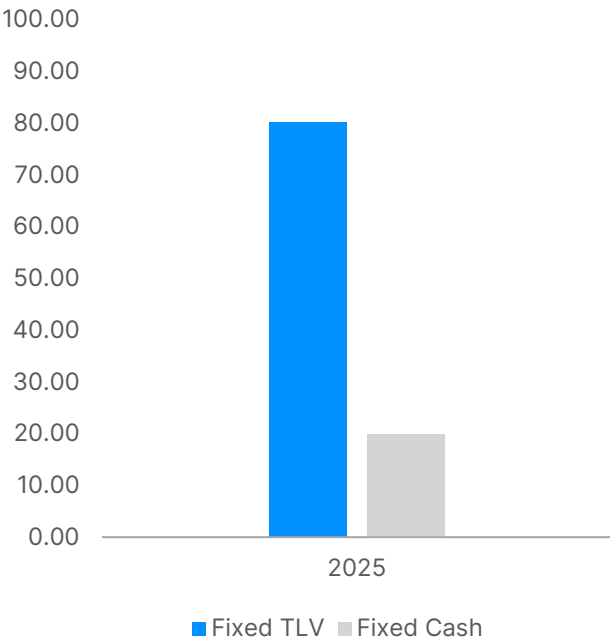


Furthermore, they did not receive any variable remuneration in any form, in accordance with the principles mentioned above, and within BTFG they did not receive any other gross fixed remuneration in cash and/or other instruments specifically granted to members of the management bodies of BT subsidiaries. The additional fixed remuneration determined in cash and paid in shares represents 0.41% of the number of shares allocated in the SOP program and paid during 2025 (compared to 0.58% for 2024, 0.59% for 2023, 0.51% for 2022 and 0.78% for 2021, taking into account the data for the corresponding reporting periods), namely 0.64% of the maximum remuneration limit set by the General Meeting of Shareholders of on April 25th, 2025 in relation to the issuer's own funds calculated on the above reference date (compared to 0.57% for 2024, 0.49% for 2023, 0.70% for 2022 and 0.84% for 2021, taking into account the data for the corresponding reporting periods). Last but not least, the variation in total remuneration was represented by an increase of 19.50% compared to 2024, 43.11% compared to 2023, 29.03% compared to 2022 and 26.14% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

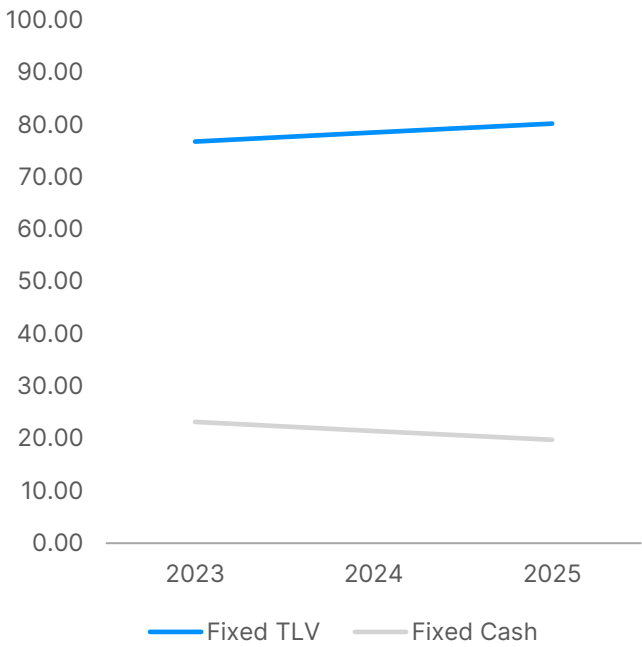
In relation to the Member of the Remuneration Committee who also serves as Chairman of the Audit Committee (M3), the total gross fixed remuneration, granted in full compliance

with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025 and received by them, represents 3.19% of the maximum remuneration limit set by the General Meeting of Shareholders of April 25th, 2025 (compared to 3.41% for 2024, 3.13% for 2023, 4.45% for 2022 and 4.91% for 2021, taking into account the data for the corresponding reporting periods), relative to the issuer's equity calculated on December 31st, 2024, and 2.44% of the total remuneration paid to persons holding key positions within the Group (compared to 2.78% for 2024, 2.23% for 2023, 3.20% for 2022 and 3.62% for 2021, taking into account the data for the respective reporting periods).

M3 – Breakdown of 2025 remuneration into its components



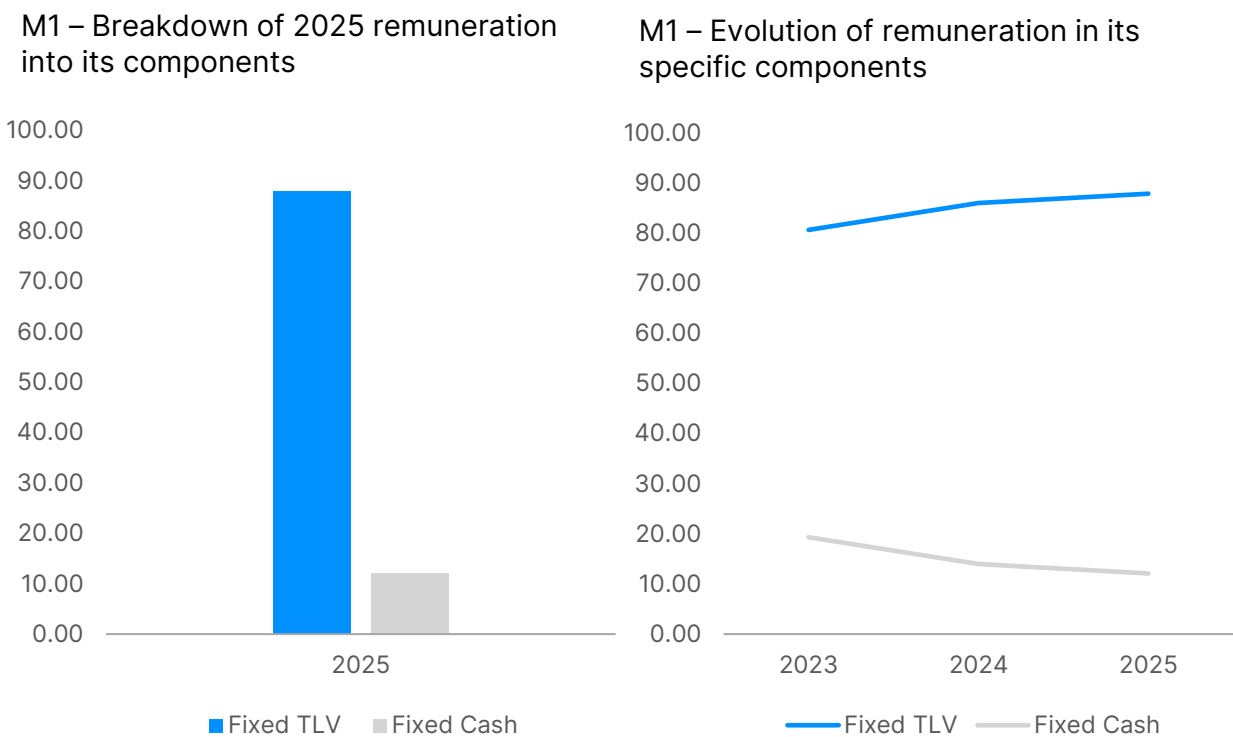
M3 – Evolution of remuneration in its specific components



Furthermore, they were not allocated any variable remuneration in any form, in accordance with the principles mentioned above, and within the BTFG, they received a fixed gross cash remuneration representing 0.11% of the total remuneration paid to persons holding key positions within the Group (as opposed to 0.17% for 2024, 0.15% for 2023 and 0.02% for 2022). The additional fixed remuneration determined in cash and paid in shares represented 1.71% of the number of shares allocated in the SOP program and paid in 2025 (compared to 2.90% for 2024, 3.10% for 2023, 2.79% for 2022 and 3.93% for 2021, taking into account the data for the respective reporting period), namely 2.67% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 2.84% for 2024, 2.57% for 2023, 3.84% for 2022 and 4.21% for 2021, taking into account the data for the corresponding reporting periods). Last but not least, the variation in total

remuneration was represented by an increase of 15.61% compared to 2024, 66.67% compared to 2023, 37.31% compared to 2022 and 41.81% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

Similarly, for the Member of the Remuneration Committee who also serves as Chairman of the Board of Directors (M1), the total gross fixed remuneration, granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025 and received by them, represents 6.08% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 6.60% for 2024, 6.36% for 2023, 9.03% for 2022 and 9.80% for 2021, taking into account the data for the respective reporting period), relative to the issuer's equity calculated on December 31st, 2024, and 4.65% of the total remuneration paid to persons holding key positions within the Group (compared to 5.38% for 2024, 4.53% for 2023, 6.50% for 2022 and 7.23% for 2021, taking into account the data for the corresponding reporting periods).

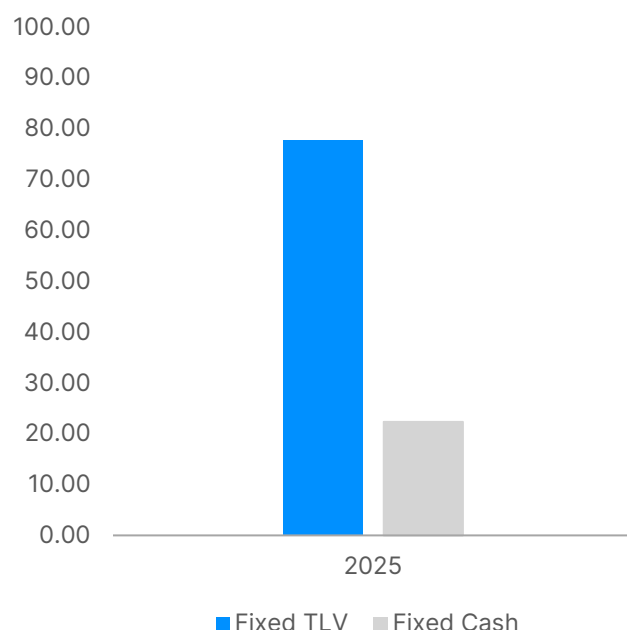


Furthermore, they did not receive any variable remuneration in any form, in accordance with the principles mentioned above, and within the BTFG they did not receive any other gross fixed remuneration in cash and/or other instruments specifically granted to members of the management bodies of BT subsidiaries. The additional fixed remuneration determined in cash and paid in shares represented 3.42% of the number of shares allocated in the SOP program and paid during 2025 (compared to 5.80% for 2024, 6.19% for 2023,

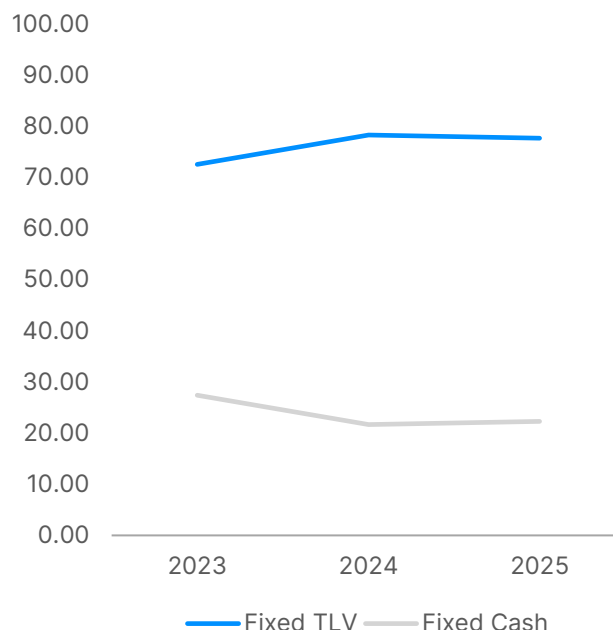
5.58% for 2022 and 7.72% for 2021, taking into account the data for the respective reporting period), respectively 5.34% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 5.68% for 2024, 5.13% for 2023, 7.68% for 2022 and 8.26% for 2021, taking into account the data for the corresponding reporting periods). Last but not least, the variation in total remuneration was represented by an increase of 15.54% compared to 2024, 59.78% compared to 2023, 23.83% compared to 2022 and 29.74% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

In addition to the members aforementioned, we would like to specify that the Chairman of the Risk Management Committee (M2) may attend meetings as a guest, mainly in relation to specific issues such as the validation of risk-related aspects related to remuneration. In this regard, the total gross fixed remuneration granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025 and received by them represented 3.00% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 3.26% for 2024, 3.13% for 2023, 4.45% for 2022 and 5.66% for 2021, taking into account the data for the corresponding reporting periods), in relation to the issuer's equity calculated for December 31st, 2024, and 2.30% of the total remuneration paid to persons holding key positions within the Group (compared to 2.65% for 2024, 2.23% for 2023, 3.20% for 2022 and 4.17% for 2021, taking into account the data for the corresponding reporting periods).

M2 – Breakdown of 2025 remuneration into its components



M2 – Evolution of remuneration in its specific components



Similar to all other members, they did not receive any variable remuneration in any form, in accordance with the principles mentioned above, and within BTFG subsidiaries they received a fixed gross cash remuneration representing 0.33% of the total remuneration paid to persons holding key positions within the Group (compared to 0.30% for 2024, 0.29% for 2023, 0.31% for 2022 and 0.27% for 2021, taking into account the data for the corresponding reporting periods). The additional fixed remuneration paid in shares represented 1.71% of the number of shares allocated in the SOP program and paid in 2025 (compared to 2.90% for 2024, 3.10% for 2023, 2.79% for 2022 and 3.93% for 2021 and taking into account the data for the respective reporting period), namely 2.67% of the maximum remuneration limit set by the General Meeting of Shareholders of April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 2.84% for 2024, 2.57% for 2023, 3.84% for 2022 and 4.21% for 2021, taking into account the data for the respective reporting year). Last but not least, the variation in total remuneration was represented by an increase of 19.05% compared to 2024, 62.69% compared to 2023, 29.35% compared to 2022 and 19.47% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

The Nomination Committee is created to issue independent opinions on nomination policies and to exercise the powers mandated by the Board of Directors in this area of activity. This committee was created in 2023, effectively taking over the powers relating to the

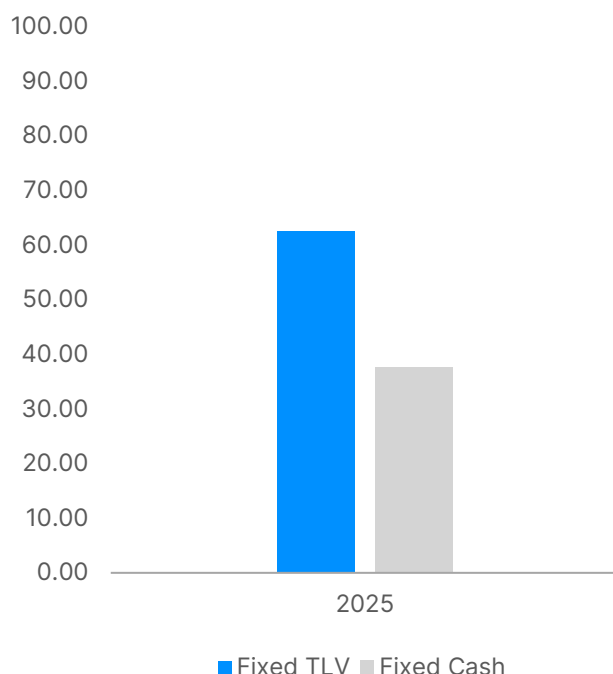
nomination of persons to positions within the committee's remit and assessing the latter's suitability for those positions from the Remuneration and Nomination Committee, now the Remuneration Committee.

The composition of the Nomination Committee at the date of this report is as follows:

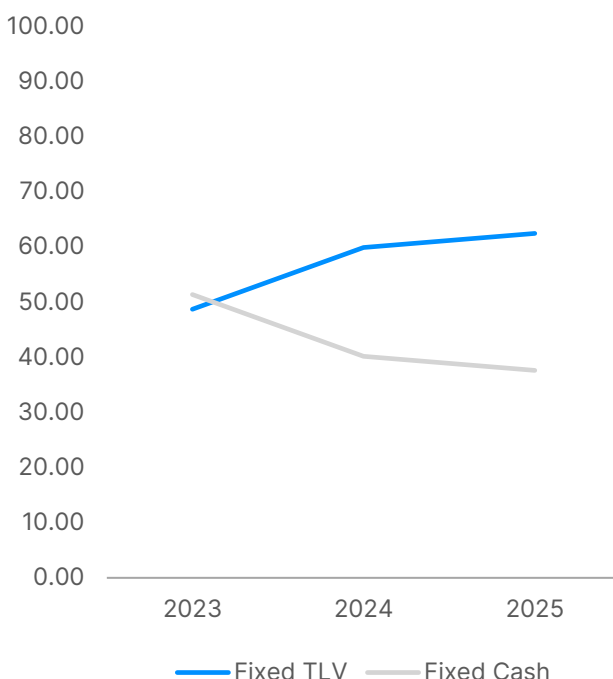
- Chairman of the Committee (M7);
- 2 Members of the Board of Directors (namely the Chairman of the Board of Directors/M1 and the Chairman of the Audit Committee/M3).

Thus, for the Chairman of NomCO (M7), the total gross fixed remuneration, granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025 and received by them, represented 1.37% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 1.42% for 2024, 1.68% for 2023, 0.16% for 2022, taking into account the data for the respective reporting period; there is no comparison for 2021, given that they were elected on the Board of Directors on April 28th, 2022 as a result of the Ordinary General Meeting of Shareholders, with approval by the authorities and the actual start of activity taking place at a later date), in relation to the issuer's equity calculated for December 31st, 2024, and 1.05% of the total remuneration paid to persons holding key positions within the Group (compared to 1.16% for 2024, 1.20% for 2023, 0.11% for 2022 and taking into account the data for the respective reporting period; there is no comparison for 2021, given the beginning of their term).

M7 – Breakdown of 2025 remuneration into its components



M7 – Evolution of remuneration in its specific components



They did not receive any variable remuneration in any form, in accordance with the principles mentioned above, and within the BTFG, they did not receive any other fixed gross remuneration in cash and/or other instruments specifically granted to members of the management bodies of BT subsidiaries. The additional fixed remuneration determined in cash and paid in shares represented 0.55% of the number of shares allocated in the SOP program and paid in 2025 (compared to 0.87% for 2024, 0.99% for 2023, there is no comparison for 2021 and 2022, given the date of commencement for their term), namely 0.85% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 0.85% for 2024, 0.82% for 2023, there is no comparison for 2021 and 2022, given that they were only elected to the Board of Directors on 28th April 2022 as a result of the Ordinary General Meeting of Shareholders, with approval by the authorities and the actual start of activity taking place at a later date). Last but not least, the variation in total remuneration was represented by an increase of 20.83% compared to 2024 (compared to 36.55% compared to 2023 and 1,496.17% compared to 2022 due to the fact that the exercise of the prerogatives under the mandate agreement began in October 2022; there are no comparison data for 2021, given the date of commencement for their term). The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

The Risk Management Committee has the primary responsibility of assessing the risks inherent to the remuneration system and proposes, where appropriate and in order to ensure that risk-taking incentives are balanced by risk management incentives, the adjustment of variable remuneration for all current and future risks assumed, following the completion of the risk alignment process, which includes: the risk measurement process, the award process and the payment process, ensuring in this regard that staff remuneration complies with the applicable rules, best practices and the bank's strategy. The Risk Management Committee also verifies and certifies the effective and efficient involvement of the internal control function in assessing the compliance of the remuneration system.

The composition of the Risk Management Committee at the date of this report is as follows:

- Chairman of the Committee (M2);
- 3 Independent members of the Board of Directors (M3, M6, M7)

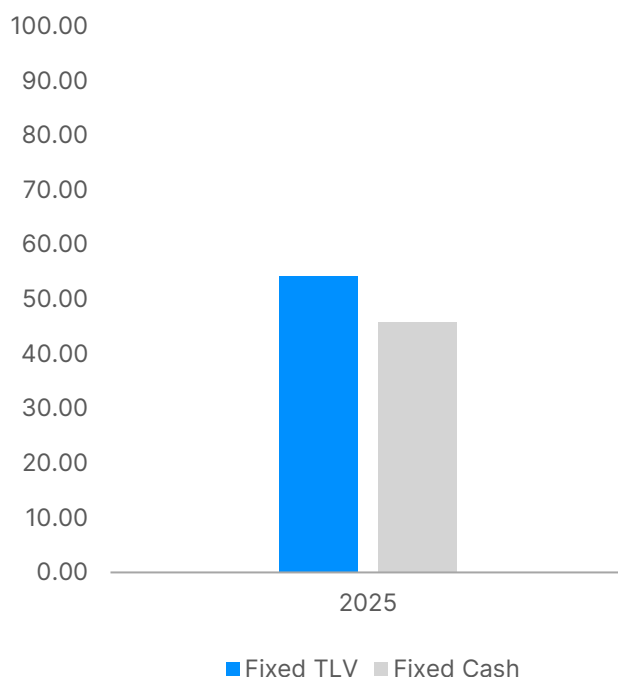
The remuneration of the RC members was specified above, when presenting the composition of the RemCO and NomCO.

Furthermore, the Audit Committee, with its responsibilities in the field of remuneration as outlined above and detailed in the Remuneration Policy for BT's management body, consists of 3 independent non-executive members, with the following composition at the date of this report:

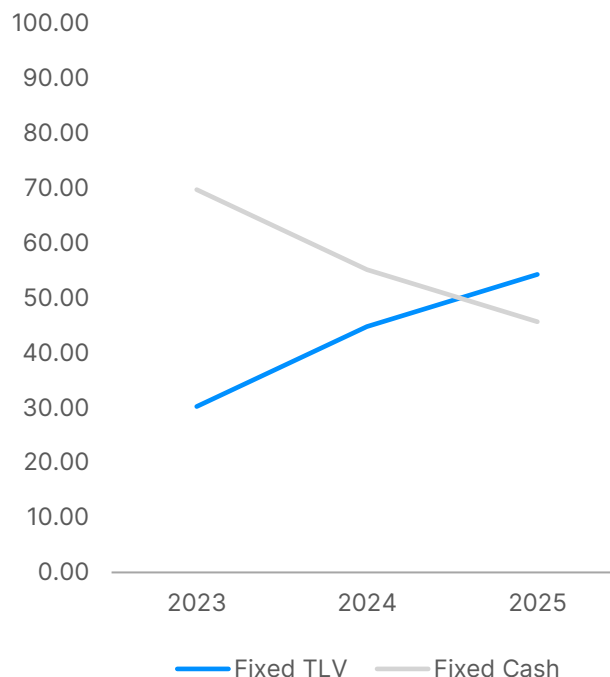
- Chairman of the Committee (M3);
- 2 Members of the Board of Directors (M2 and M5)

Thus, for the AC Member who also serves as a Board of Directors Member (M5), the total gross fixed remuneration, granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025 and received by them, represented 1.16% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 1.21% for 2024, 1.23% for 2023, 1.48% for 2022 and 1.69% for 2021, taking into account the data for the respective reporting periods), relative to the issuer's equity calculated for December 31st, 2024, and 0.88% of the total remuneration paid to persons holding key positions within the Group (compared to 0.99% for 2024, 0.88% for 2023, 1.07% for 2022 and 1.25% for 2021, taking into account the data for the respective reporting periods).

M5 – Breakdown of 2025 remuneration into its components



M5 – Evolution of remuneration in its specific components



He did not receive any variable remuneration in any form, in accordance with the principles mentioned above, and within BTFG, they received a fixed gross remuneration in cash representing 0.02% of the total remuneration paid to persons holding key positions within the Group (compared to 0.19% for 2024). The additional fixed remuneration determined in cash and paid in shares represented 0.41% of the number of shares allocated in the SOP program and paid during 2025 (compared to 0.58% for 2024, 0.45% for 2023, 0.39% for 2022 and 0.57% for 2021, taking into account the data for the respective reporting periods), namely 0.64% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 0.57% for 2024, 0.37% for 2023, 0.53% for 2022 and 0.61% for 2021, taking into account the data for the respective reporting periods). Last but not least, the variation in total remuneration was represented by an increase of 16.88% compared to 2024, 59.95% compared to 2023, 46.62% compared to 2022 and 46.27% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

The remuneration of the other members of the AC was specified above, when presenting the composition of the RemCO, NomCO or RC.

REMUNERATION OF THE MEMBERS OF THE LEADERS' COMMITTEE

The Leaders' Committee is responsible for organising and managing the Bank's activities. The rules and procedures of the Leaders' Committee are approved by the Board of Directors. The composition of Banca Transilvania's Leaders' Committee and the professional background of its members as of December 31st, 2025 is as follows:

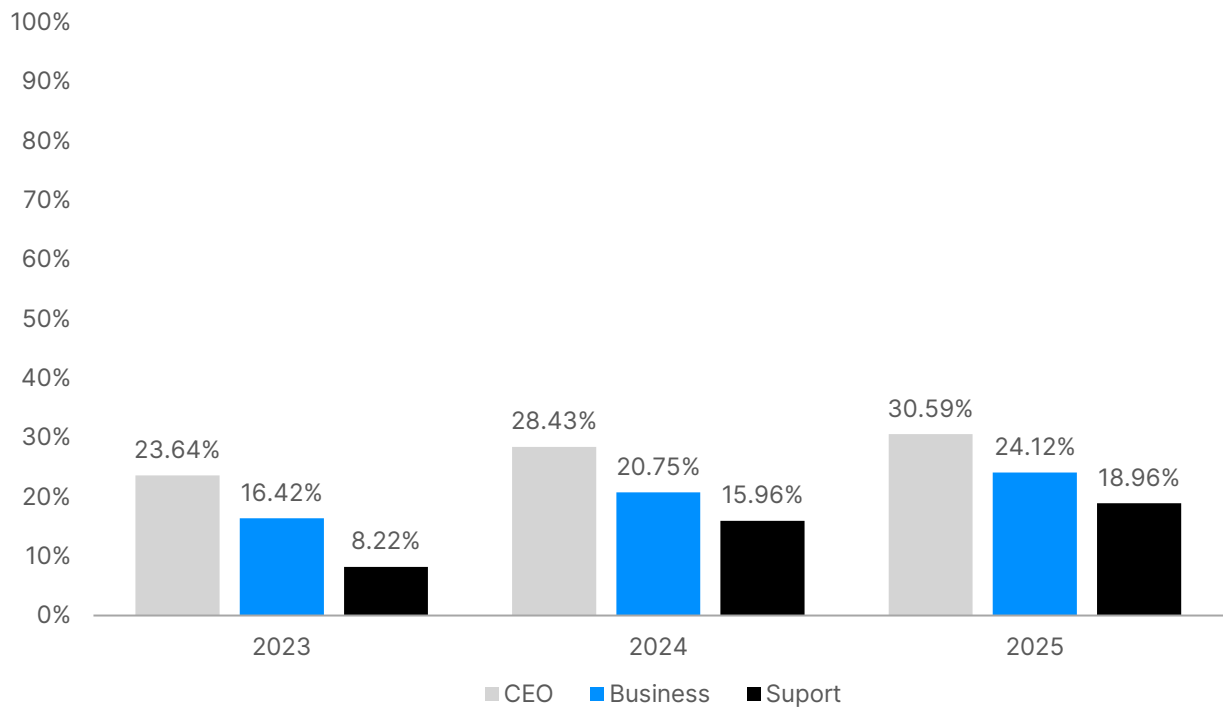
MEMBER	FUNCTION	PERSONAL DATA
ÖMER TETİK since June 2013	Chief Executive Officer (CEO)	Middle East Technical University, Ankara, Faculty of Economics, honours student. CV and bio here .
<i>In alphabetical order</i>		
CĂTĂLIN CARAGEA since August 2024	Deputy Executive Officer - Chief Risk Officer (CRO)	Bucharest Academy of Economic Studies, Faculty of Management, Romania. CV and bio here
GEORGE CĂLINESCU since September 2013	Deputy Executive Officer - Chief Financial Officer (CFO)	American University in Bulgaria, Blagoevgrad, Bachelor's Degree in Business Management. CV and bio here .
ANDRZEJ DOMINIAK since March 2024	Deputy Executive Officer - Chief Technology Officer (CTO)	Stanford University, Machine Learning. CV and bio here
OANA ILAȘ from October 2022	Deputy Executive Officer - Retail Banking	Executive MBA, Sheffield University (United Kingdom), CV and bio here .
TIBERIU MOISĂ since May 2016	Deputy Executive Officer - MidCorporate & SME	Executive MBA, Sheffield University (United Kingdom). CV and bio here .
BOGDAN PLEȘUVEȘCU since April 2023	Deputy Executive Officer - Legal	Postgraduate courses in International Law – European Union Institutions, International Law, CV and bio here
LEONTIN TODERICI since August 2013	Deputy Executive Officer - Chief Operations Officer (COO)	PhD in Cybernetics and Economic Statistics, Babeș-Bolyai University, Faculty of Economic Sciences. CV and bio here .

During 2025, there were no changes in the composition of the Leaders' Committee. The remuneration policy for senior management is commensurate with the size and organisation of BT, as well as the nature, scope and complexity of its business activities.

By applying the remuneration policy, BT aims to retain and develop a senior management team with the highest professional, educational and moral standards – qualities that generate added value for the Bank and its subsidiaries, ensuring consistency between remuneration and the business strategy, risk policy, values and long-term objectives of the Bank and its subsidiaries.

The policy allows and promotes sound and effective risk management, without encouraging risk-taking that exceeds the level of risk tolerance, thus preventing incentives for excessive risk-taking and other behaviours contrary to the interests of the credit institution. This is also illustrated in the chart below, which shows the ratio of variable to fixed compensation for senior management, in full compliance with legal requirements.

MEMBERS' CURRENT VR/FR PROPORTION (2023-2025)

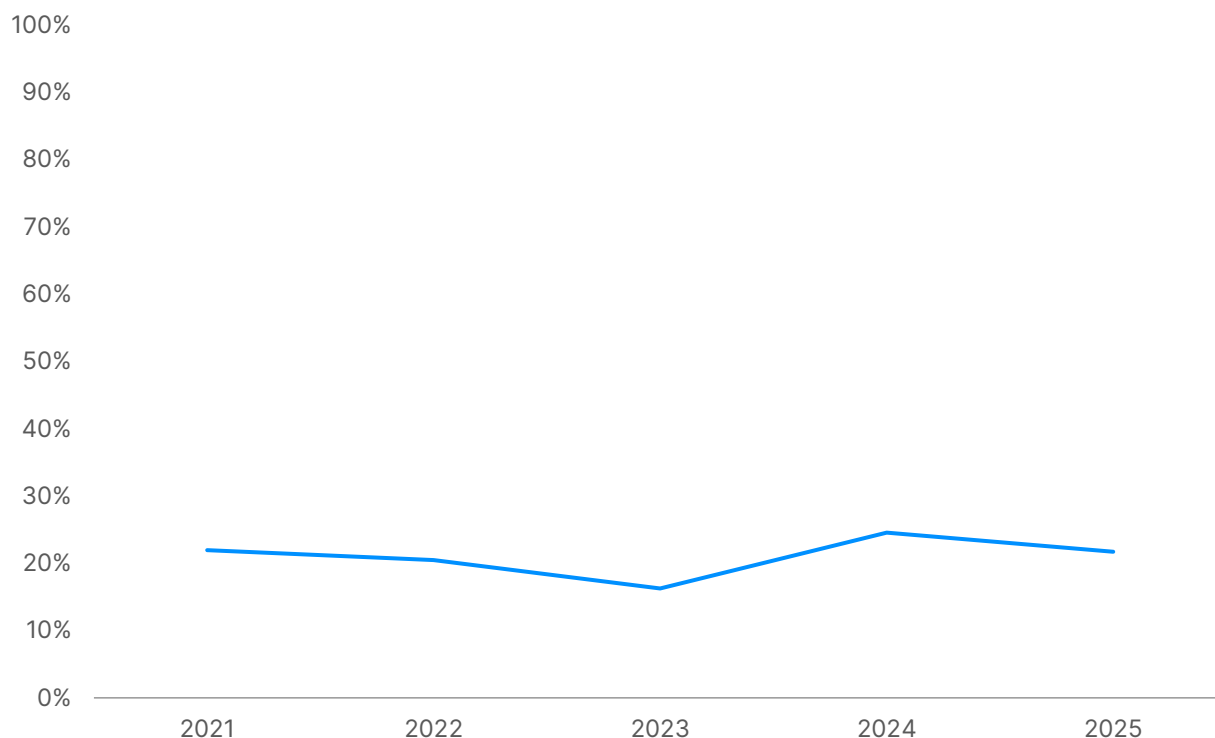


Banca Transilvania has established a remuneration system for senior management that is applied on *arm's length* basis to all staff, adapted to different levels of responsibility and professional development for each position. Leaders' receive a fixed monthly remuneration approved in accordance with the corporate and legal rules detailed above. Also as part of their fixed remuneration, BT Leaders receive a holiday bonus, equivalent to one gross taxable base salary (from the month of application), once a year when the 10 working days of annual leave are granted. For Leaders who do not work a full year at Banca Transilvania, the holiday bonus is granted in proportion to the period worked, regardless of the number of days of annual leave due. In order to fulfil their specific job obligations, members of senior management are provided with technical equipment (laptop, telephone, etc.) and

means of transportation and/or reimbursement of transportation costs incurred, as well as the conclusion of an individual *Directors and Officers Liability Insurance* policy, in accordance with the applicable legal provisions on companies.

The variable remuneration of the members of the Leaders' Committee is determined and supervised by the Bank's Board of Directors, in accordance with the remuneration policy.

VR/FR PROPORTION EVOLUTION (2021-2025)



The average evolution of the percentage of variable remuneration (VR) out of the fixed remuneration (FR) shows the proportion of variable remuneration compared to the fixed remuneration for the entire senior management body.

Leaders' remuneration is granted in accordance with the general principles on remuneration set out above, with the following additional remarks:

For members of the Leaders' Committee, the deferred portion of the total variable remuneration is significant and never less than 40%, in accordance with applicable legislation, as determined by the management body in its supervisory capacity. The deferral period is 5 years and is appropriately correlated with the nature of the activity, its risks and the activities of the staff concerned, as follows*:

- 1/5 of the deferred variable remuneration will be paid in T+1

- 1/5 of the deferred variable component will be paid in T+2
- 1/5 of the deferred variable component will be paid in T+3
- 1/5 of the deferred variable portion will be paid in T+4
- 1/5 of the deferred variable portion will be paid in T+5,

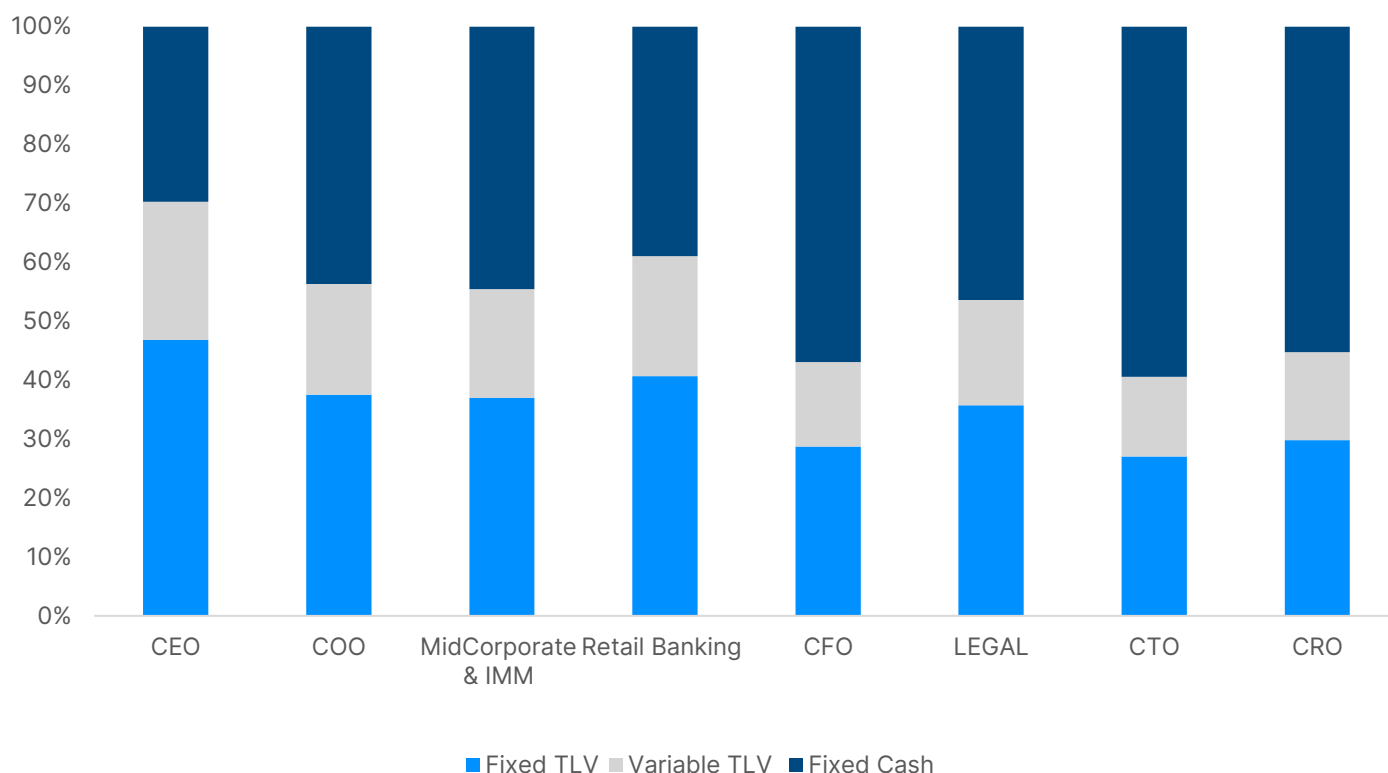
*where T is the moment when the corresponding part of the variable remuneration granted is paid immediately.

The deferral period may be extended by decision of the Board of Directors. After the expiry of each deferral period for members of the Leaders' Committee, a 12-month retention period applies, i.e. a period of time after the vesting of the shares that were granted as variable remuneration, during which they cannot be sold or accessed without the consent of the Board of Directors.

The individual annual performance of the members of the Management Committee was determined in accordance with rules established in the internal methodology. Performance is assessed yearly, given the long term deferral period for the stock option plan, before each variable component of the deferred remuneration is released. Each deferred amount is vested based on an individual assessment of performance, at the time of vesting. The standards used to assess annual performance are based on the SMART methodology. These principles form the basis of the methodology used for the rules for determining the criteria.

Taking into account the components that make up the compensation of the members of the Management Committee, the following table shows the percentage of each component within the total individual compensation:

FIXED AND VARIABLE REMUNERATION - SHARE OUT OF TOTAL REMUNERATION FOR 2025



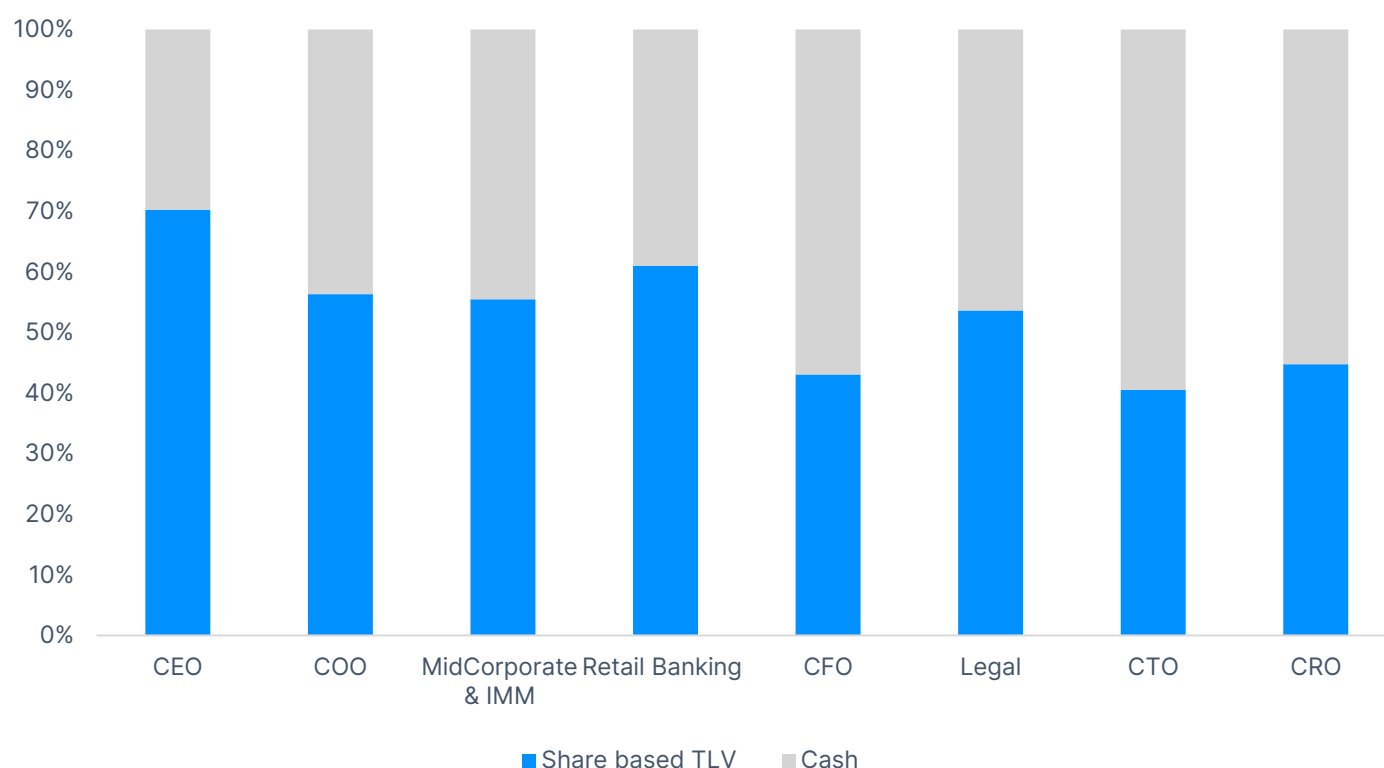
The consolidated dashboard below shows the current status of remuneration levels for 2025.

Director	Share of Fixed TLV remuneration	Share of Variable TLV remuneration	FR share in total remuneration for key positions	VR share in total remuneration for key positions
CEO	66.67%	33.33%	5.88%	1.80%
COO	66.67%	33.33%	2.12%	0.49%
CFO	66.67%	33.33%	1.63%	0.27%
Retail Banking	66.67%	33.33%	1.71%	0.44%

MidCorporate & IMM	66.67%	33.33%	1.92%	0.44%
CRO	66.67%	33.33%	1.55%	0.27%
Legal	66.67%	33.33%	1.88%	0.41%
CTO	66.67%	33.33%	1.92%	0.30%

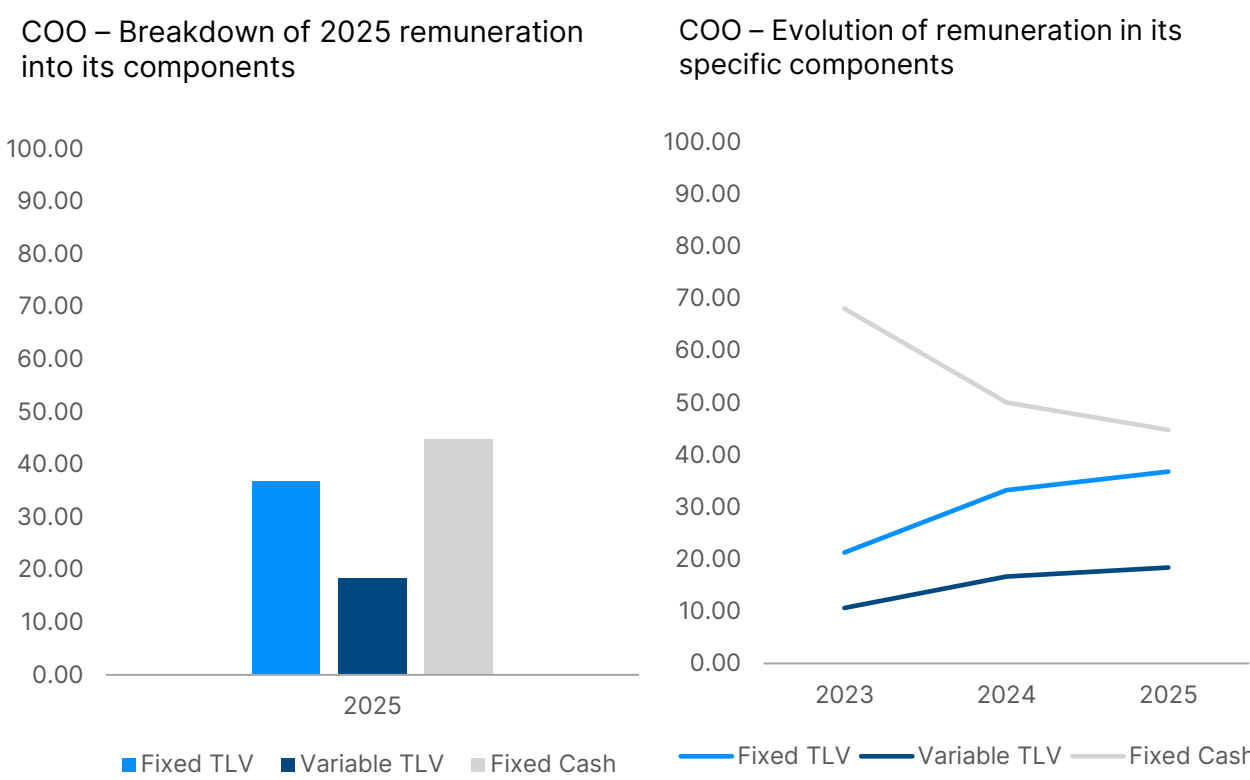
Additionally, the chart below shows the breakdown of executive compensation for 2025, in amounts paid in TLV shares and cash.

SHARES (TLV) AND CASH OUT OF TOTAL REMUNERATION FOR 2025



2024 marked the start of the renovation process for several agencies and branches and the installation of photovoltaic panels on some of the Bank's real estate assets. These objectives were successfully managed by the Deputy Executive Officer – COO. In line with the performance achieved, their total remuneration was granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025,

complying with the ratio between fixed and variable remuneration established therein (23.11% compared to 20.38% for 2024, 16.72% for 2023, 21.70% for 2022 and 20.63% for 2021, taking into account the data for the corresponding reporting periods). Thus, fixed remuneration represented 2.77% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 3.02% for 2024, 3.26% for 2023, 3.94% for 2022 and 3.92% for 2021, taking into account the data for the corresponding reporting periods), in relation to the issuer's equity calculated for December 31st, 2024 and 2.12% of the total remuneration paid to persons holding key positions within the Group (compared to 2.46% for 2024, 2.32% for 2023, 2.83% for 2022 and 2.89% for 2021). Similarly, variable remuneration represented 0.64% of the maximum remuneration limit set by the General Meeting of Shareholders on 25 April 2025 (compared to 0.61% for 2024, 0.54% for 2023, 0.85% for 2022 and 0.81% for 2021, taking into account the data for the corresponding reporting periods), relative to the issuer's equity calculated on the above reference date, and 0.49% of the total remuneration paid to persons holding key positions within the Group (compared to 0.50% for 2024, 0.39% for 2023, 0.62% for 2022 and 0.60% for 2021).



Within BTFG subsidiaries, they received a fixed gross cash remuneration representing 0.05% of the total remuneration paid to persons holding key positions within the Group (compared to 0.05% for 2023 and 2024, 0.03% for 2022 and 0.05% for 2021). The remuneration paid in shares represented 1.13% of the number of shares allocated in the

SOP programme and paid in 2024 (compared to 1.73% for 2024, 1.79% for 2023, 1.50% for 2022 and 1.85% for 2021), respectively 1.76% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 1.70% for 2024, 1.48% for 2023, 2.07% for 2022 and 1.99% for 2021)⁸. Last but not least, the total remuneration variation represents an increase of 17.56% compared to 2024, 49.50% compared to 2023, 35.99% compared to 2022, and 55.20% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

As part of the strategy for 2024, nine key objectives were set for the Deputy Executive Officer – COO, with a direct impact on front-office activity and targeting the streamlining of operations and the optimisation of the Banca Transilvania network and processes. These indicators were achieved with scores ranging between 4 and 5, with a 4.92 average, ensuring alignment with the company's strategic directions and the SMART methodology. The significant contribution of the Deputy Executive Officer – COO consisted in integrating OTP processes and flows into the BT infrastructure so that customer operations run smoothly, adapting the IT infrastructure from a digital processing of transactions standpoint, and reducing cash operations in Banca Transilvania's territorial network.

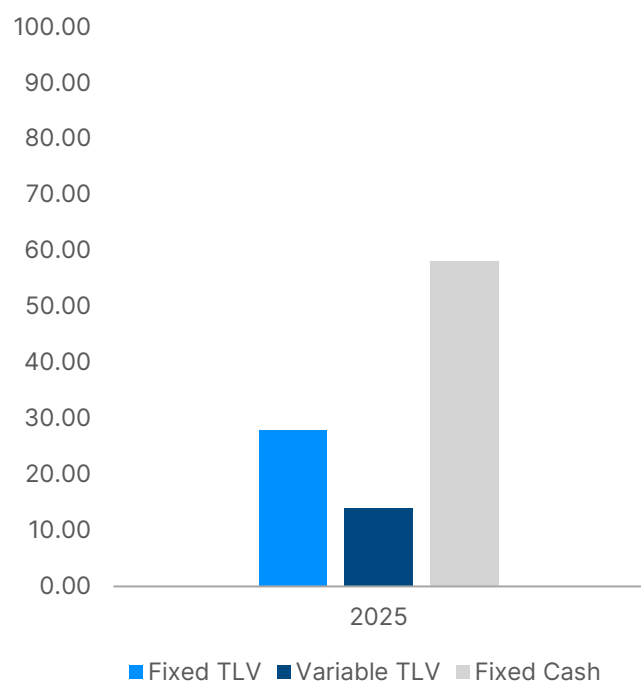
Regarding Banca Transilvania's sustainability objectives, their contribution mainly focused on migrating to utilities supplied from renewable sources for 85% of the total, capitalising on opportunities to contribute to the provision of such utilities, including through changes in the bank's infrastructure and operational flows, both for its staff and its customers.

From a financial perspective, consideration was given to improving planning capabilities in terms of minimum requirements for own funds and liabilities (MREL), streamlining the preparation of group-level financial statements, and implementing cost management modules. These objectives were successfully managed by the Deputy Executive Officer – CFO, who received remuneration commensurate with achieved performance, in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025, within the approved ratio between fixed and variable remuneration therein, this ratio represents 16.76% (compared to 14.99% for 2024, 12.20% for 2023, 20.61% for 2022 and 20.56% for 2021). Thus, fixed remuneration represented 2.12% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 2.37% for 2024, 2.87% for 2023, 3.83% for 2022 and 3.89% for 2021), relative to the issuer's equity calculated for December 31st, 2024 and 1.63% of the total remuneration paid to persons holding key positions within the Group (compared to 1.93% for 2024, 2.04% for 2023, 2.76% for 2022 and 2.87% for 2021). Similarly, variable

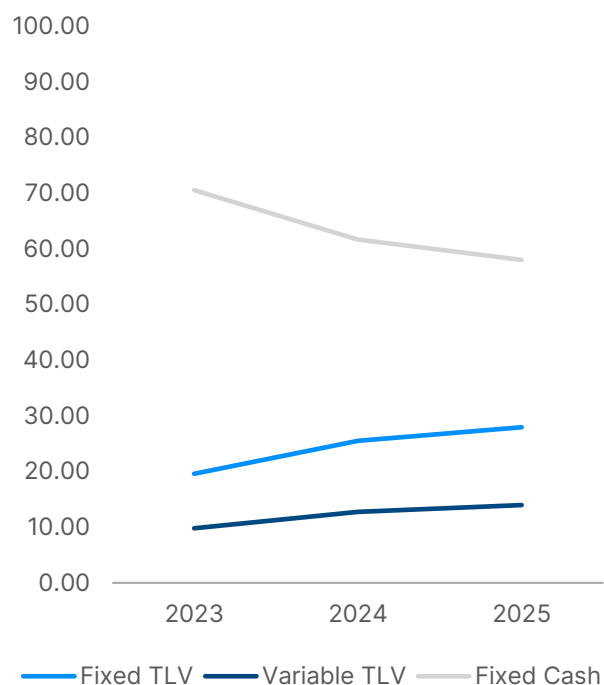
⁸ Given that this is the fourth year in which the report has been prepared in accordance with the remuneration policy approved by the AGM, no comparable data is available in terms of remuneration and its variation for the previous five financial years.

remuneration represented 0.36% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 0.35% for 2024 and 2023, respectively, 0.79% for 2022 and 0.80% for 2021), relative to the issuer's equity calculated for the above reference date, and 0.27% of the total remuneration paid to persons holding key positions within the Group (compared to 0.29% for 2024, 0.25% for 2023, 0.57% for 2022 and 0.59% for 2021, taking into account the data for the corresponding reporting periods).

CFO – Breakdown of 2025 remuneration into its components



CFO – Evolution of remuneration in its specific components



Within BTFG subsidiaries, they received fixed gross cash remuneration representing 0.05% of the total remuneration paid to persons holding key positions within the Group (compared to 0.05% for 2024 and 2023, 0.03% for 2022 and 2021, taking into account the data for the corresponding reporting periods). Remuneration paid in shares represented 0.65% of the number of shares allocated in the SOP program and paid in 2025 (compared to 1.03% for 2024, 1.17% for 2023, 1.40% for 2022 and 1.85% for 2021), respectively 1.01% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 1.01% for 2024, 0.97% for 2023, 1.92% for 2022 and 1.98% for 2021). Last but not least, the variation in total remuneration was represented by an increase of 14.84% compared to 2024, 29.92% compared to 2023, 5.45% compared to 2022 and 17.88% compared to 2021.

The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

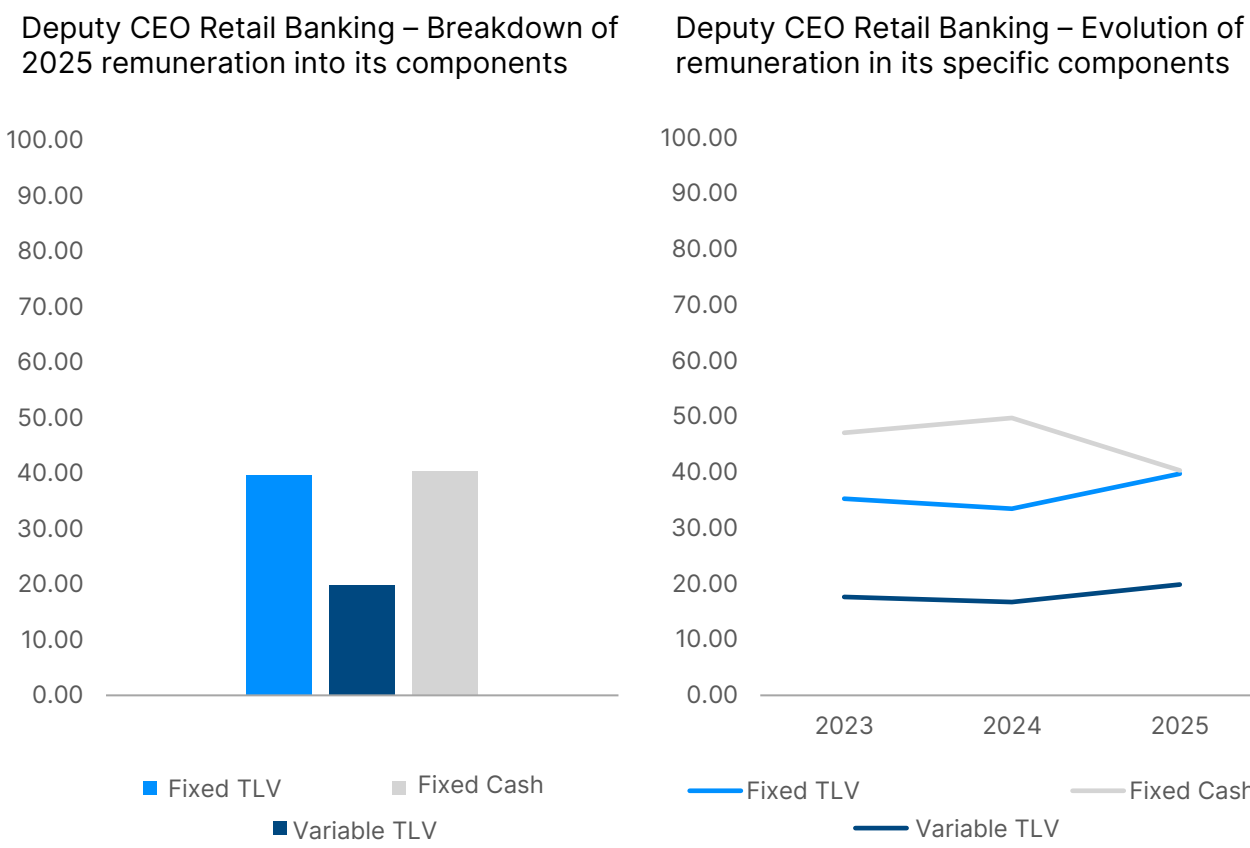
As part of the 2024 strategy, seven key objectives were defined for the activity coordinated by the Deputy Executive Officer – CFO, mainly related to financial performance management, accounting and reporting, and capital and financial markets management. These indicators were achieved with scores between 3 and 5, with a 4.10 average, ensuring alignment with the company's strategic directions and the SMART methodology. The main challenges in achieving these were faced in relation to the preparation of monthly financial statements at group level and the bank's reporting following the implementation of new technical resource management solutions in Banca Transilvania's infrastructure.

Also, from a sustainability perspective, the Deputy Executive Officer – CFO made a significant contribution by supporting the publication of the 2024 sustainability report with the approval of the company's auditors.

Moving now from the financial-operational area to the business area, the objectives set for this purpose mainly targeted increasing the number of loans granted, the number of cards issued and authorised digital payments, increasing the profit generated from distributed insurance products and cross-selling the entire range of products offered by BTFG companies, reducing the number of inactive customers, with the aim of complying with AML standards, achieving the budgets set, both by sector of activity and in relation to the issuer's subsidiaries with financial activity, all of which are complemented by social and environmental initiatives (related to the credit products offered, but also through the use of recycled materials for issuing cards or through the issuance of digital cards). These objectives were successfully managed directly by both the Deputy Executive Officer – Retail Banking and the Deputy Executive Officer – MidCorporate & SME.

With regard to the Deputy Executive Officer – Retail Banking, appointed by the Board of Directors and approved in advance by the National Bank of Romania in October 2022, in line with the performance achieved, their total remuneration was granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders on April 25th, 2025, respecting the ratio between fixed and variable remuneration established therein, namely 25.55% (compared to 20.65% for 2024, 15.35% for 2023; there is no comparison for 2022 and 2021). Thus, their fixed remuneration represented 2.23% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 2.06% for 2024, 2.03% for 2023, 0.34% for 2022; there is no comparison for 2021), relative to the issuer's equity calculated for December 31st, 2024, and 1.71% of the total remuneration paid to persons holding key positions within the Group (compared to 1.68% for 2024, 1.44% for 2023, 0.24% for 2022; there is no comparison for 2021). Similarly, their variable remuneration represented 0.57% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 0.43% for 2024,

0.31% for 2023, there is no comparison for 2022 and 2021), relative to the issuer's equity calculated on the above reference date, and 0.44% of the total remuneration paid to persons holding key positions within the Group (compared to 0.35% for 2024, 0.22% for 2023, no comparison available for 2022 and 2021).



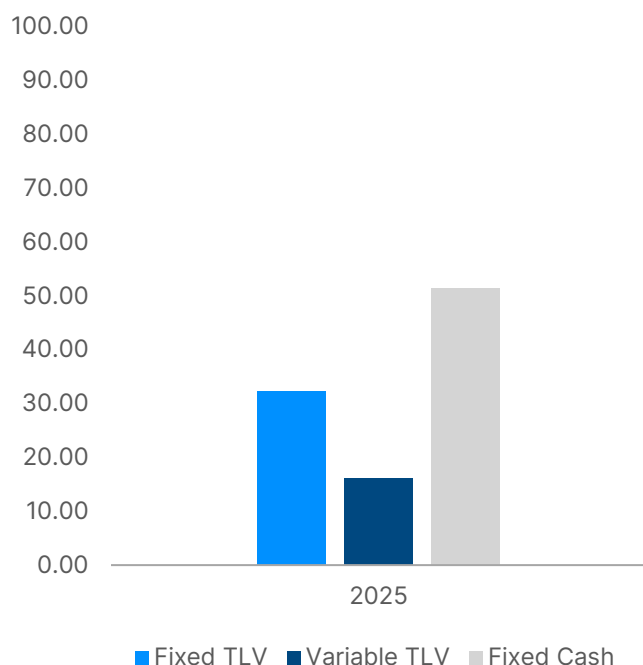
Within BTFG subsidiaries, they received fixed gross cash remuneration representing 0.05% of the total remuneration paid to persons holding key positions within the Group (compared to 0.05% for 2024, 0.04% for 2023, 0.03% for 2022; no comparison available for 2021). The remuneration paid in shares represented 0.96% of the number of shares allocated in the SOP program and paid in 2025 (compared to 1.15% for 2024, 0.99% for 2023, no comparison for 2022 and 2021), namely 1.50% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 1.12% for 2024, 0.82% for 2023, no comparison available for 2022 and 2021). Last but not least, the variation in total remuneration was represented by an increase of 39.67% compared to 2024 (compared to 95.79% for 2024 and 1190.81% for 2023, taking into account that prior approval by the NBR was issued in October 2022; there is no comparison for 2022 and 2021). The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

As part of the 2024 strategy, six key objectives were defined for the Deputy Executive Officer – Retail Banking, mainly targeting the digitisation and optimisation of the loan portfolio in the area for which they are responsible. These objectives were achieved with a 5.00 average ensuring alignment with the company's strategic directions and the SMART criteria set for the Leader. The performance indicators focused on improving the customer experience and streamlining the contracting flows for various products in Banca Transilvania's portfolio, with the strategic objective of increasing the revenues generated by this market segment of Banca Transilvania and addressing those specific markets where a high appetite for certain particular products has been identified.

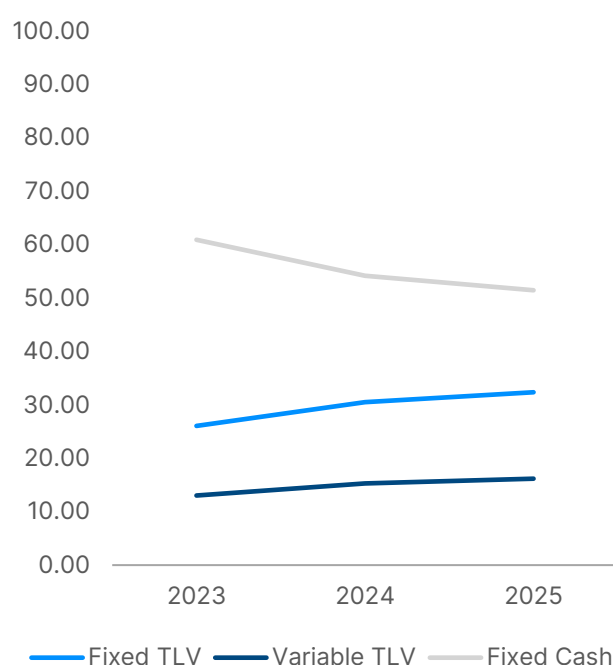
In terms of sustainability, the Deputy Executive Officer – Retail Banking contributed by developing banking strategies and products for underdeveloped, less populated or isolated communities, as well as by developing products complementary to the bank's initial portfolio, from the beginning of the reference period, also available in digital format, such as the generation from BT Pay of various products offered by the bank.

For the Deputy Executive Officer – MidCorporate & SME, in line with the performance achieved, their total remuneration represented 22.69% of the variable remuneration in relation to the fixed remuneration and was granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025, respecting the proportion established therein (compared to 20.85% for 2024, 17.49% for 2023, 22.43% for 2022 and 19.41% for 2021, taking into account the data for the corresponding reporting periods). Thus, their fixed remuneration represented 2.51% of the maximum remuneration limit set by the General Meeting of Shareholders of April 25th, 2025 (compared to 2.72% for 2024, 3.11% for 2023, 3.78% for 2022 and 4.14% for 2021, taking into account the data for the corresponding reporting periods), relative to the issuer's equity calculated for December 31st, 2024 and 1.92% of the total remuneration paid to persons holding key positions within the Group (compared to 2.22% for 2024, 2.22% for 2023, 2.72% for 2022 and 3.05% for 2021). Similarly, their variable remuneration represented 0.57% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 0.57% for 2024, 0.54% for 2023, 0.85% for 2022 and 0.80% for 2021, taking into account the data for the corresponding reporting periods), relative to the issuer's equity calculated on the above reference date, and 0.44% of the total remuneration paid to persons holding key positions within the Group (compared to 0.46% for 2024, 0.39% for 2023, 0.61% for 2022 and 0.59% for 2021, taking into account the data for the corresponding reporting periods).

Deputy CEO MidCorporate & IMM –
Breakdown of 2025 remuneration into its
components



Deputy CEO MidCorporate & IMM –
Evolution of remuneration in its specific
components



Within BTFG subsidiaries, they received a fixed gross cash remuneration representing 0.34% of the total remuneration paid to persons holding key positions within the Group (compared to 0.35% for 2024, 0.37% for 2023, 0.39% for 2022 and 0.34% for 2021). The remuneration paid in shares represented 1.01% of the shares allocated in the SOP program and paid in 2025 (compared to 1.64% for 2024, 1.78% for 2023, 1.50% for 2022 and 1.85% for 2021 and taking into account the data for the corresponding reporting periods), respectively 1.58% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 1.61% for 2024, 1.48% for 2023, 2.07% for 2022 and 1.98% for 2021, taking into account the data for the corresponding reporting periods). Last but not least, the variation in total remuneration was represented by an increase of 17.42% compared to 2024, 40.99% compared to 2023, 29.05% compared to 2022 and 39.57% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

As part of the 2024 strategy, seven key objectives were defined for the Deputy Executive Officer – MidCorporate & SME, primarily related to the group's financial performance in terms of products developed for target markets in its area of activity, as well as their placement within the group's expansion strategy. These indicators were achieved with

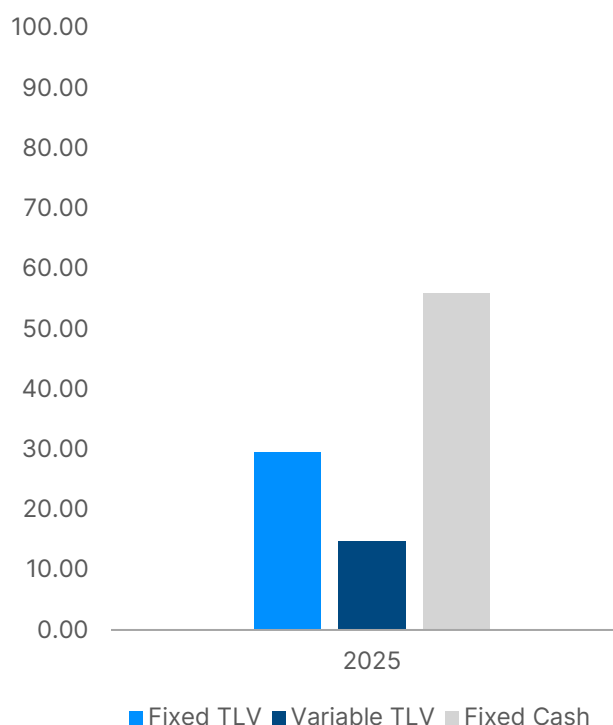
scores between 4 and 5 and a 4.60 average, ensuring alignment with the company's strategic directions and criteria for growing the customer portfolio in line with the company's commercial objectives.

Also, in the ESG area, the notable contribution of the Deputy Executive Officer – MidCorporate & SME subscribes to the sphere of green and sustainable financing, maximising the opportunities offered by the market during the reference period for Large Corporate customers. Their area of activity also saw optimisations of operational flows, particularly with regard to the migration of process origination to digital.

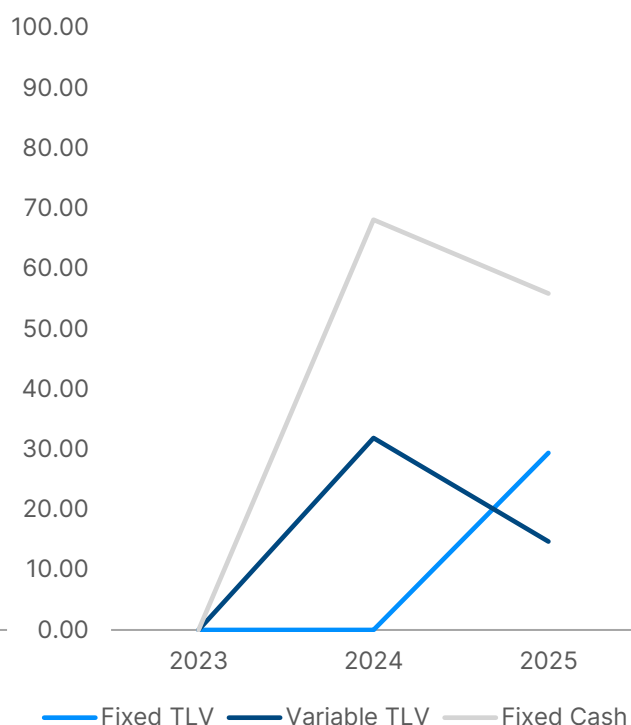
In order to ensure a solid risk management framework, in accordance with the regulations issued by the EBA and the NBR, specific objectives were set in direct coordination with the Deputy Executive Officer – CRO.

In line with the performance achieved, the total remuneration of the Deputy Executive Officer - CRO, representing 17.53% variable remuneration in relation to fixed remuneration, was granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders on April 25th, 2025, complying with the proportion established therein. Thus, the fixed remuneration represented 2.03% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 0.58% for 2024), relative to the issuer's equity calculated for December 31st, 2024, and 1.55% of the total remuneration paid to persons holding key positions within the Group (0.47% for 2024). Similarly, variable remuneration represented 0.36% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 0.27% for 2024), relative to the issuer's equity calculated on the above reference date, and 0.27% of the total remuneration paid to persons holding key positions within the Group (compared to 0.22% for 2024).

CRO – Breakdown of 2025 remuneration into its components



CRO – Evolution of remuneration in its specific components

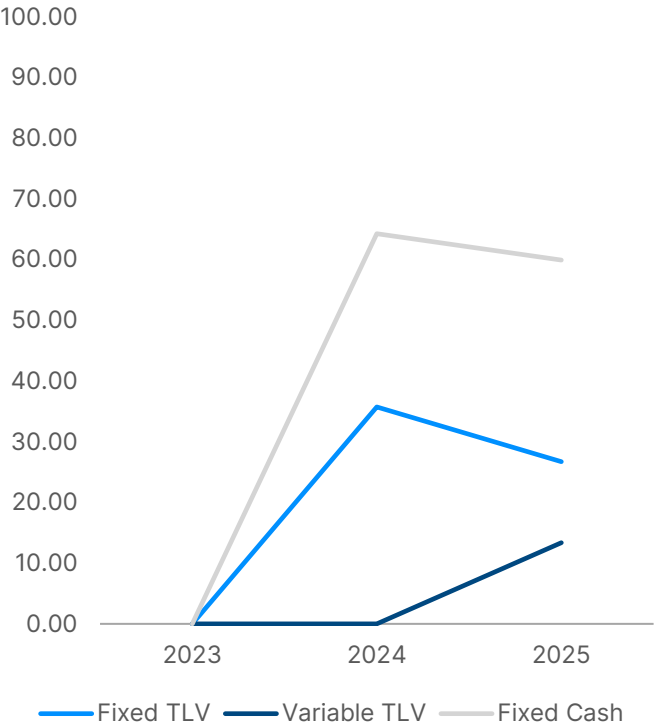


Within BTFG subsidiaries, they received a fixed gross cash remuneration representing 0.03% of the total remuneration paid to persons holding key positions within the Group (in previous years, no amounts were granted under this heading). The remuneration paid in shares represented 0.59% of the number of shares allocated through the SOP program and paid in 2025 (there are no comparative data for previous years), namely 0.93% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (there are no comparative data for previous years). The variation in total remuneration can only be determined by reference to the four months of the mandate during 2024, in which sense the remuneration paid during 2025 increased by 237.87% compared to 2024. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

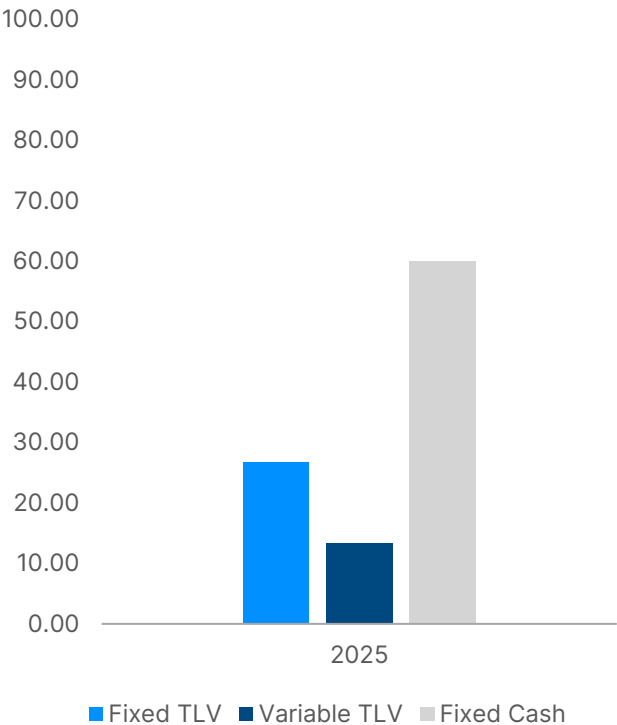
As part of the strategy for 2024, three key objectives were defined for the Deputy Executive Officer – CRO, taking into account the start date of the mandate – August 2024 – which mainly concerned non-financial reporting, in particular with regard to the carbon footprint and reporting in accordance with Basel III requirements. The performance indicators were achieved with scores ranging from 3 to 5, thus obtaining an average of 4.17.

Also, among the changes made at the level of the Leaders' Committee during 2024 was the appointment of a new Deputy Executive Officer - Chief Technology Officer (CTO) in order to adapt Banca Transilvania's activity and infrastructure to the scale of its activity and the vast regulatory framework governing its activity. For the Deputy Executive Officer - Chief Technology Officer (CTO), in line with their performance, their total remuneration was represented by 15.63% variable remuneration in relation to fixed remuneration and was granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders on April 25th, 2025, respecting the proportion established therein (there is no comparative data for previous years). Thus, the fixed remuneration represented 2.51% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 1.98% for 2024), in relation to the issuer's equity calculated for December 31st, 2024, and 1.92% of the total remuneration paid to persons holding key positions within the Group (compared to 1.61% for 2024) – as he was appointed in March 2024, there is no comparison data for the 2021-2023 period.

CTO – Breakdown of 2025 remuneration into its components



CTO – Evolution of remuneration in its specific components



Similarly, variable remuneration represented 0.39% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (no comparative data available for previous years), relative to the issuer's equity calculated on the above reference date,

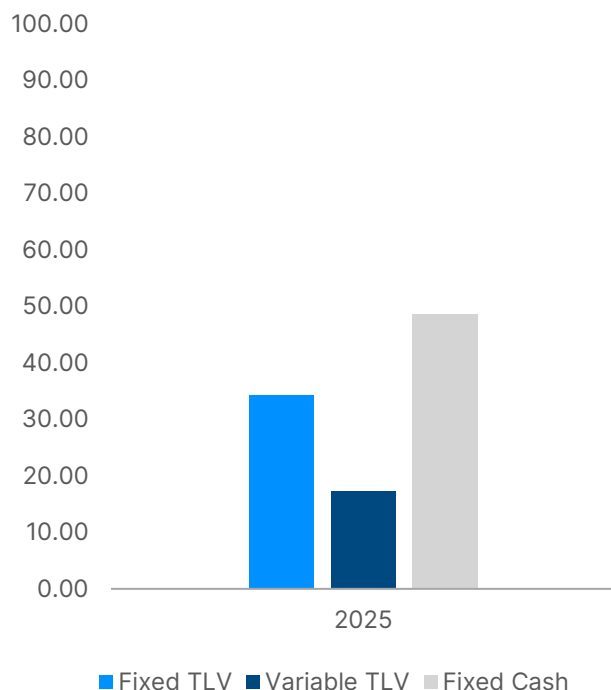
and 0.30% of the total remuneration paid to persons holding key positions within the Group (no comparative data available for previous years). Within BTFG subsidiaries, they received fixed gross cash remuneration representing 0.03% of the total remuneration paid to persons holding key positions within the Group (compared to 0.01% for 2024). The remuneration paid in shares represented 0.66% of the number of shares allocated through the SOP program and paid in 2025 (compared to 0.73% for 2024), namely 1.02% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 0.71% for 2024). Last but not least, the variation in total remuneration was represented by an increase of 75.51% compared to 2024, with no comparative data available for the 2021-2023 period. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

Part of the 2024 strategy, six key objectives were set out for the specific activity of the Deputy Executive Officer - Chief Technology Officer mostly related to new software platforms, infrastructure updates and a renewed data strategy. The indicators were fulfilled with scores between 3 and 5 and a 3.80 average, thus ensuring the achievement of the Bank's strategy and the application of the SMART Methodology. The main challenges in achieving them related to IT solutions used in business applications.

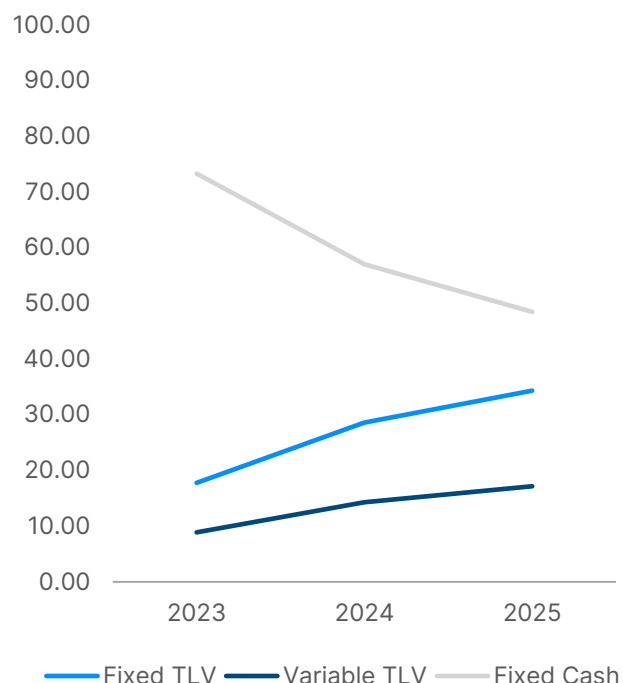
With regard to the Deputy Executive Officer - Legal, appointed by the Board of Directors and preliminarily approved by the National Bank of Romania in March 2023 in line with the performance achieved, their total remuneration was granted in full compliance with the remuneration policy approved by the General Meeting of Shareholders of April 25th, 2025, complying with the ratio between fixed and variable remuneration established therein (21.77% for 2025, compared to 17.43% for 2024, and for 2023, 2022 and 2021 there is no comparison).

Thus, the fixed remuneration represented 2.45% of the maximum remuneration limit set by the General Meeting of Shareholders on 25 April 2025 (compared to 2.44% for 2024, 1.55% for 2023; for 2021 and 2022, as there is no comparative data), relative to the issuer's equity calculated for December 31st, 2024, and 1.88% of the total remuneration paid to persons holding key positions within the Group (compared to 1.99% for 2024, 1.11% for 2023; for 2021 and 2022 there is no comparison). Similarly, variable remuneration represented 0.53% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 0.43% for 2024; there is no comparison for 2023, 2022 and 2021), relative to the issuer's equity calculated on the above reference date, and 0.41% of the total remuneration paid to persons holding key positions within the Group (compared to 0.35% for 2024; for 2023, 2022 and 2021 there are no comparative data).

Deputy CEO Legal – Breakdown of 2025 remuneration into its components



Deputy CEO Legal – Evolution of remuneration in its specific components



Within BTFG subsidiaries, they received fixed gross cash remuneration representing 0.09% of the total remuneration paid to persons holding key positions within the Group (compared to 0.09% for 2024 and 0.95% for 2023). The remuneration paid in shares represented 0.89% of the number of shares allocated through the SOP program and paid during 2025 (compared to 1.13% for 2024; for 2023, 2022 and 2021 there are no comparative data), respectively 1.39% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated on the above reference date (compared to 0.85% for 2024; there are no comparable data for 2023, 2022 and 2021). Last but not least, the variation in total remuneration was represented by an increase of 29.77% compared to 2024 (compared to 68.15% compared to 2023; for 2022 and 2021, no comparative information is available for the variation in total remuneration). The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

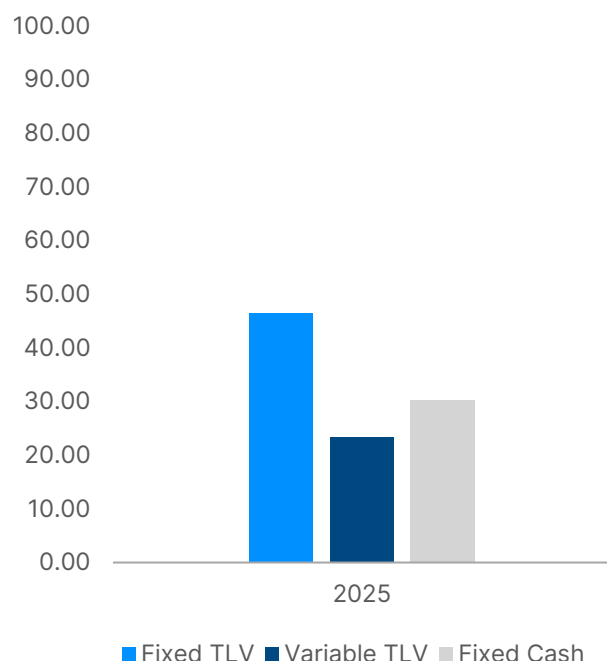
As part of the strategy for 2024, six key objectives were defined for the Deputy Executive Officer - Legal, achieved with a score between 3 and 5, with an overall average of 4.67, ensuring alignment with the company's strategic directions and SMART criteria. These indicators mainly focused on the effective management of legal risk arising from credit activities, alternative financing products to traditional banking, and tangible assets intended for the realisation of receivables, which make up the Bank's financial asset portfolio. From a prudential risk perspective, the Deputy Executive Officer - Legal's

responsibilities focused on legal risk management, particularly in relation to non-performing assets (i.e. foreclosures, insolvencies, etc.), as well as credit risk, including their classification within the limits of Banca Transilvania's strategy and risk profile.

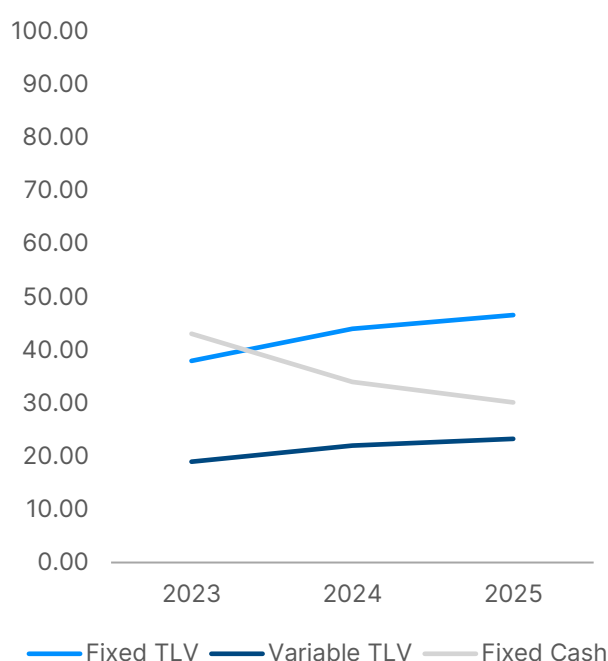
All objectives in the areas already covered above were directly supervised by the Chief Executive Officer. In addition to these, the objectives set in relation to large corporate clients, accelerating business development and the strategic integration of entities that have recently joined BTFG, implementing a model that improves the Bank's revenues, correlated with ensuring better cost control and continuously improving the governance framework of the Bank and the Group. These objectives were achieved with scores between 4 and 5 and an average of 4.67, thus marking, in line with the performance achieved, a total remuneration for the CEO in full compliance with the remuneration policy approved by the General Meeting of Shareholders on April 25th, 2025, complying with the ratio between fixed and variable remuneration established therein (30.59% for 2025, compared to 28.43% for 2024, 23.64% for 2023, 31.23% for 2022 and 30.47% for 2021).

Thus, the fixed remuneration represented 7.68% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 8.32% for 2024, 8.23% for 2023, 10.33% for 2022 and 10.24% for 2021), relative to the issuer's equity calculated for December 31st, 2024, and 5.88% of total remunerations paid to persons holding key positions within the Group (compared to 6.78% for 2024, 5.86% for 2023, 7.43% for 2022 and 7.55% for 2021). Similarly, variable remuneration represented 2.35% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025 (compared to 2.36% for 2024, 1.94% for 2023, 3.23% for 2022 and 3.12% for 2021), relative to the issuer's equity calculated for the above reference date, and 1.80% of the total remuneration paid to persons holding key positions within the Group (compared to 1.93% for 2024, 1.39% for 2023, 2.32% for 2022 and 2.30% for 2021).

CEO – Breakdown of 2025 remuneration into its components



CEO – Evolution of remuneration in its specific components



Within BTFG subsidiaries, they received fixed gross cash remuneration representing 0.05% of the total remuneration paid to persons holding key positions within the Group (compared to 0.05% for 2024, 0.05% for 2023, 0.04% for 2022 and 0.03% for 2021). The remuneration paid in shares represented 3.85% of the number of shares allocated through the SOP program and paid during 2025 (compared to 6.18% for 2024, 5.94% for 2023, 4.98% for 2022 and 6.35% for 2021, taking into account the data for the corresponding reporting periods), namely 6.01% of the maximum remuneration limit set by the General Meeting of Shareholders on April 25th, 2025, in relation to the issuer's equity calculated for the above reference date (compared to 6.05% for 2024, 4.92% for 2023, 6.85% for 2022 and 6.80% for 2021). Last but not least, the variation in total remuneration was represented by an increase of 17.14% compared to 2024, 62.36% compared to 2023, 42.70% compared to 2022 and 64.20% compared to 2021. The shares were paid on June 2nd, 2025, free of charge, with no allocation price (comparable to an option price).

Given the responsibilities of the Chief Executive Officer to coordinate all activities of Banca Transilvania and considering the high complexity of the regulatory framework governing its activities, taking into account its dual role as a bank and issuer, the area of Regulatory Compliance & Capital Management is of great importance. Thus, one of the most important performance indicators for the reference period is the implementation and consolidation of the MREL requirements strategy, an indicator achieved with a score of 5, ensuring alignment with the company's strategic directions and the SMART criteria, the methodology

of which was outlined above. Also, as mentioned above, the CEO has also set the main objectives for their subordinates, mainly the other Leaders (Deputy Executive Officers), which is why they ensure that the objectives are fulfilled in correspondingly. Considering the above regarding the degree of achievement of each Leader's objectives, combined with the supervision of the sustainability strategy, the objectives on which the remuneration depended were achieved.

MALUS AND CLAWBACK

Variable remuneration is determined on the basis of a performance assessment and the risks assumed by the institution, in accordance with internal rules. The risk adjustment prior to award (ex-ante adjustment) is based on risk indicators and ensures that variable remuneration is fully aligned with the risks assumed. The criteria used for ex-ante risk adjustment are granular enough to reflect all relevant risks and are based on measures used for other risk management purposes.

Ex-post risk adjustments (after the level of remuneration has been set) are risk alignment mechanisms through which the institution itself adjusts the Leader's remuneration using methods such as malus or clawback agreements. They are always linked to performance or risks and arise as a result of an analysis carried out to certify that ex-ante risk adjustments were sufficient, to the extent that they existed, or whether new risks have arisen or unexpected losses have occurred. The extent to which an ex-post risk adjustment is necessary depends on the accuracy of the ex-ante risk adjustment and is determined on a back-testing basis. Up to 100% of the total variable remuneration may be subject to malus or clawback arrangements, based on criteria that must cover, in particular, situations where new risks have arisen or unexpected losses have occurred.

Up to 100% of the total variable remuneration may be subject to malus or clawback arrangements, based on criteria that must cover, in particular, situations where the person concerned:

- a) has engaged in conduct that has resulted in significant losses for BT or was responsible for such conduct;
- b) has failed to meet the appropriate standards of good repute and relevant experience.

The Bank is therefore entitled to withdraw all or part of the variable remuneration awarded to a Leader:

- c) if the bank suffers a significant failure in risk management;
- d) in the event of a significant increase in the Bank's economic or regulatory capital base;
- e) in the event of a regulatory sanction where the conduct of a Leaders' Committee member contributed to the sanction;

- f) in the event of proven fraud in which that Leader was directly involved;
- g) if the assessment of the Leader's performance is based on information that subsequently proves to be significantly inaccurate;
- h) if the Leader has failed to meet the appropriate standards of good repute and relevant experience.

The Risk Management Committee has primary responsibility for assessing the risks inherent to the remuneration system and proposes, where appropriate and in order to ensure that risk-taking incentives are balanced by risk management incentives, the adjustment of variable remuneration for all current and future risks taken, following the completion of the risk alignment process, which includes:

- the performance and risk measurement process,
- the award process,
- and
- the payment process.

Malus/clawback clauses will be updated in accordance with any legal changes made to the applicable legal framework.

Malus/clawback clauses have been introduced into the agreements governing variable remuneration paid in 2025, subject to these conditions. We note that there were no causes or situations that would lead to the application of malus or clawback clauses in relation to the issuer's senior management, given that, as a result of the Risk Management Committee's assessment of the assumed risks, there is no need to adjust the variable remuneration and, implicitly, to activate the malus/clawback clauses.

This Report has been prepared in accordance with the requirements of Law No. 24/2017 and has been approved by the Board of Directors, and will be submitted to a consultative vote at the Annual General Meeting of Shareholders, as provided for in Article 111 of Law No. 31/1990, with the opinion of the shareholders at the general meeting on the Remuneration Report, resulting from the vote, being of a consultative nature. Considering that the remuneration report for the 2024 financial year was submitted to a consultative vote at the Ordinary General Meeting of Shareholders on April 25th, 2025, without any objections or comments being raised by the shareholders regarding its preparation and content, we hereby state that this remuneration report of Banca Transilvania for the 2025 financial year has been prepared in a manner similar to the previous one, to which additional graphical details have been added, and in accordance with the legal grounds mentioned above.

2025



ANNUAL REPORT

for the financial year 2025

**In compliance with the Financial Supervision
Authority's Regulation no. 5/2018**

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Issuer Identification Data

Report date: 24.03.2026

Name of the company: BANCA TRANSILVANIA S.A.

Registered office: 30-36 Calea Dorobanților street, Cluj-Napoca, Cluj county, code 400117

Phone/fax: 0264.407.150; 0264.301.128

Tax identification no.: RO5022670

Trade Register no.: J12/4155/1993

Registered capital, subscribed and paid: RON 10,903,222,250

The regulated market where the issued securities are traded: Bucharest Stock Exchange

Main features of the securities issued by the company:

1,090,322,225 NOMINAL SHARES, at the value of RON 10/share.

1. Analysis of the Bank's Activity

a) Description of the Bank's main activity

Banca Transilvania S.A. („the Bank” or „BT”) is a joint-stock company headquartered in Cluj-Napoca, 30-36 Calea Dorobanților, Cluj county, Romania.

The Bank operates pursuant to Company Law no. 31/1990 and Government Emergency Ordinance no. 99/2006 on credit institutions and capital adequacy (as subsequently amended). According to Article 6 in the Bank's Articles of Association, its main field of activity is represented by “other monetary intermediation activities”.

b) The Bank's establishment date

Banca Transilvania S.A. was incorporated in December 1993 and became effectively operational on February 16, 1994. The Bank was recorded with the Trade Register under no. J12/4155/1993 on 16.12.1993; the Bank's tax identification number is RO5022670. The Bank was recorded with the Bank Register under no. RB-PJR-12-019 on 18.02.1999.

c) Significant mergers and reorganizations of the Bank, its subsidiaries or controlled companies during the financial year

BANCA TANSILVANIA S.A.

BT is a joint-stock banking institution (with foreign and domestic shareholders).

Banca Transilvania Financial Group (“the Group” or “BT Group”) was established in 2003, Banca Transilvania being the main entity and parent company. The Group subsidiaries where BT has direct and indirect shareholding at the 31st of December 2025 are: Victoriabank S.A., Salt Bank S.A., BT Capital Partners S.A., BT Leasing Transilvania IFN S.A., BT Investments S.R.L., BT Broker de Asigurare S.R.L., BT Direct IFN S.A., BT Asset Management SAI S.A., INNO Investments S.A.I. S.A. (OTP Asset Management Romania S.A.I. SA), BT Leasing Moldova (MD) S.R.L., BT Microfinanțare IFN S.A., VB Investment Holding B.V., Improvement Credit Collection S.R.L., BT Pensii S.A., BTP One S.R.L., BTP Store Hub Turda S.R.L., Inter Terra S.R.L., BTP Retail S.R.L., Code Crafters by BT S.R.L., OTP Factoring S.R.L., BTP Store Hub Oradea S.R.L., O.C.N.

Microinvest S.R.L., BRD Societate de Administrare a Fondurilor de Pensii Private S.A., Secure Cash Express SRL and Microinvest Technology S.R.L.

The Group's main fields of activity are: banking through Banca Transilvania S.A., Victoriabank S.A., and Salt Bank S.A., leasing and consumer finance mainly through BT Leasing Transilvania IFN SA, Avant Leasing IFN S.A., BT Direct IFN S.A, BT Microfinanțare IFN S.A., BT Leasing MD S.R.L. and OCN Microinvest SRL, asset management through BT Asset Management S.A.I S.A. INNO Investments S.A.I. S.A. (OTP Asset Management S.A.I. S.A.), investment and brokerage through BT Capital Partners S.A. and administration of pension funds (except for those in the public system) through BT Pensii S.A. and BRD Societate de Administrare a Fondurilor de Pensii Private S.A. Moreover, the Bank controls two investment funds that are also included in the consolidation.

As of October 2025, the Group has taken control of the entities O.C.N. Microinvest S.R.L. and Microinvest Technology S.R.L., through Victoriabank S.A. Also in October 2025, the Bank established the company Secure Cash Express S.R.L., over which it has control. Also, starting with November 2025, the Bank and the Group acquired control over BRD Societate de Administrare a Fondurilor de Pensii Private S.A.

At the subsidiaries level the following changes took place:

BT PENSII – S.A.F.P.F. S.A.

- By Decision no. 1/09.04.2025, the Board of Directors („BoD”) decided to appoint Mr. Ionuț-Florentin Stroe as Deputy General Manager, for a new term of 4 (four) years, starting with 08.07.2025 and ending 08.07.2029, in this regard, the Financial Supervisory Authority („FSA”) issued the Decision No. 588/23.06.2025;
- By Decision no. 362/23.04.2025, the FSA definitively authorized the takeover of the management of the BRD Medio Optional Pension Fund (renamed the Pensia Mea Plus Optional Pension Fund) from BRD S.A.F.P.P. S.A., the transfer of the fund being made on 28.04.2025;
- By the Decision of the Ordinary General Meeting of Shareholders („OGMS”) no. 1/30.04.2025 it was decided to revoke the financial auditor of F.P.F. Pensia Mea Plus, Price Waterhouse Coopers Audit S.R.L., and to appoint Deloitte Audit S.R.L. to audit the financial statements of F.P.F. Pensia Mea Plus for the financial years 2025-2026;
- Considering the appointment, starting with 29.11.2025, of Ms. Corina-Mădălina Cojocaru as General Manager of BRD S.A.F.P.P. S.A., the BoD the following:
 - termination of the mandate of Ms. Corina-Mădălina Cojocaru as General Manager of BT Pensii S.A.F.P.F. S.A. starting with 29.11.2025 (BoD Decision no. 1/20.11.2025);
 - the appointment of Mr. Ionuț-Florentin Stroe in place of Ms. Corina-Mădălina Cojocaru as General Manager, starting with 29.11.2025 and until 08.07.2029, the exercise of the duties related to the position being carried out only after obtaining the approval decision issued by F.S.A. (BoD Decision no. 2/20.11.2025);
- By Decision of the Extraordinary General Meeting of Shareholders („EGMS”) no. 1/10.10.2025, it was decided to increase the Company's share capital by a cash contribution of RON 6,000,000 through the issue of 6,000,000 new shares with a nominal value of RON 1 per share to existing shareholders, proportionally to the number of shares they own, as follows:

- contribution from the BT Asset Management SAI S.A. shareholder in the amount of 5,706,000 RON, representing 5,706,000 shares with a nominal value of RON 1/share; and
 - contribution from the BT Investments S.R.L. shareholder in the amount of RON 294,000, representing 294,000 shares with a nominal value of RON 1 per share;
- Therefore, following the increase, the company's capital has a value of RON 26,730,766, being divided into 26,730,766 shares with a nominal value of RON 1 per share, the shareholder structure being as follows:
 - BT Asset Management SAI S.A. holds a number of 25,420,958 registered shares, with a nominal value of RON 1 each and a total value of RON 25,420,958, representing 95.1% of the Company's subscribed and paid-up share capital; and
 - BT Investments S.R.L. holds a number of 1,309,808 registered shares, with a nominal value of RON 1 each and a total value of RON 1,309,808, representing 4.9% of the Company's subscribed and paid-up share capital;
- The change in the share capital was approved by FSA through Decision no. 1237/22.12.2025;
- By Decision of the BoD no. 1/09.04.2025, it was decided to appoint Ms. Dana-Corina Benea as Deputy CEO, for a new term of 4 (four) years, starting with 08.01.2026, A.S.F. issuing in this regard Decision no. 1236/22.12.2025.

BT ASSET MANAGEMENT SAI S.A.

- Through the FSA Authorizations no. 96 and 97 of 26.09.2025, the extension of the mandate of General Manager (Deputy CEO) for Mr. Călin Condor was authorized, respectively the authorization of Mr. Tudor Irimiea as General Manager (Deputy CEO).

BT MICROFINANTARE IFN S.A.

- Following the appointment by Ms. Cristina-Dalia Sindile, as Executive Director of Companies within Banca Transilvania, starting with 01.04.2025, Mr. Marian Ene was appointed as General Manager of the company for a term of 4 years;
- On 30.06.2025, the General Meeting of BT Microfinantare IFN S.A. Shareholders decided to revoke the mandate of Mr. Daniel Szekely from the position of member of the BoD of BT Microfinantare IFN SA, starting with 01.07.2025 and to appoint, as of 01.07.2025, as director, member of the BoD of BT Microfinantare IFN SA, for the vacant mandate, to Ms. Sindile Cristina-Dalia. The mandate of the new director will be valid until 01.07.2029. The new director will have the same remuneration approved for the old director. The appointment of a new member of the Audit Committee of BT Microfinantare IFN SA, Ms. Sindile Cristina-Dalia, was also approved, beginning on 1.07.2025;
- At the same meeting, it was approved the modification of the company's secondary object of activity by renouncing the activities with CAEN codes 6422 - Activities of financing channels and 6630 - Fund management activities.
- At the meeting of the Board of Directors on 05.12.2025, it was decided:
 - Revocation of the mandate of Mr. Marian Ene from the position of General Manager on 31.12.2025, following his appointment as SME & Micro Coordinating Director within Banca Transilvania;
 - Revocation of the mandate of Mr. Dan Cojocaru from the position of Deputy CEO on 31.12.2025 and the appointment of him as General Manager, starting with 01.01.2026, for a mandate of 4 years;
 - The appointment, starting from 01.01.2026, to the position of Deputy CEO, for a mandate of 4 years for Mrs. Anca Tigoiu.

BT BROKER DE ASIGURARE S.R.L.

- Following FSA Decision 334 and 335/14.04.2025 approving the change in the executive management of BT Broker de Asigurare, the sole shareholder's Decision no. 7/31.10.2024 was registered with the Trade Register, appointing Mr. Valentin Coroiu as the General Manager of the company and Ms. Laura Chesa as the Deputy General Manager of the company for a period of four years, starting on 01.11.2024.

BT CAPITAL PARTNERS S.A.

- By the Decision of the Extraordinary General Meeting of Shareholders ("EGMS") no. 1/15.05.2025 it was established that the company's registered office would be relocated to Cluj-Napoca, B-dul 21 Decembrie 1989, No. 77, The Office Building, Blocks C-D, 2nd floor, Cluj County, Romania;
- By Decision no. 1/30.06.2025 the BoD decided:
 - to withdrawal of the authorization and the registration of the secondary office with the status in Timișoara, Palanca str. no. 2, Building A, ap. 3, county. Timiș;
 - the opening of a secondary office with agency status in the Municipality of Timisoara, 700 Square, Coriolan Brediceanu Street no. 10, Building C "AFI Park Timișoara", ground floor, Timișoara county Timiș;
- By the BoD Decision No. 2/04.09.2025, the BoD decided:
 - to withdraw the authorization and remove the secondary office with agency status in Brașov, No. 17, Eroilor Boulevard, 1st floor, Brașov County, and
 - the opening of a secondary office with agency status in Brașov, 13 Decembrie Street No. 1, building 1, 1st floor, apartments 7 and 8, Brașov County;
- By the BoD Decision No. 1/09.12.2025, it was decided:
 - to withdraw the authorization and remove the secondary office with agency status in Constanța, Regina Elisabeta Blvd. no. 2B, Gate 1 zone, Constanța county, and
 - the opening of a secondary office with agency status in Constanța, Alexandru Lăpușneanu Blvd., no. 179A, „Verona Residence” building, lot 1/1, ground floor, commercial space 1, Constanța county.

BT DIRECT IFN SA

- On 27.01.2025, the company's shareholders decided to increase the share capital of BT Direct IFN SA by RON 30,000,000, through the cash contribution of the shareholder Banca Transilvania. Following this increase, the share capital of BT Direct IFN SA is RON 146,330,775, with Banca Transilvania holding 98.6800808% of the share capital;
- On 12.03.2025, the company's shareholders decided to update the company's Articles of Association by removing the following activities identified by CAEN codes from the company's secondary object of activity:
 - 6020 Television program broadcasting activities, video program distribution activities;
 - 6039 Distribution activities of other content;
 - 6630 Fund management activities;
- CAEN code 6492 will also be part of the secondary activity, with the following description:
 - Granting consumer loans without issuing credit cards - CAEN Code 6492;
 - Issuing and managing credit cards in connection with the company's lending activity - CAEN Code 6492;

- Services enabling cash withdrawals from a payment account, as well as all operations necessary for the functioning of the payment account - CAEN Code 6492;
- Credit card payment operations where the funds are covered by a credit line opened for a payment service user – NACE Code 6492;
- Administration of credit cards on behalf of other non-banking financial institutions or credit institutions, in mandate - CAEN Code 6492;
- On 25.09.2025, the company's shareholders decided that, given the expiration on 1.10.2025, of the mandate of Ms. Florentina-Virginia Mircea as a member of the Board of Directors, her mandate would be extended until 1.10.2029;
- By Resolution no. 2/25.11.2025 of the Board of Directors it was decided the transfer of the company's registered office to the following address: Cluj-Napoca, 21 December 1989 Blvd., no. 77, The Office, Building C-D, ground floor, Cluj County;
- Considering the expiration on 05.01.2026 of the mandate as Director of Ms. Ilas Ioana-Mihaela, by EGMS Decision no. 1/30.12.2025 it was decided to extend the mandate by 4 years.

BT LEASING TRANSILVANIA IFN S.A.

- By the BoD Decision no. 1/28.02.2025 it was decided to appoint, starting on 01.03.2025, Mr. Pop Marian-Rodion as Deputy Chief Executive Officer and Manager, for a term valid until 01.03.2029;
- On 28.02.2025, the shareholders of BT Leasing Transilvania IFN, respectively OTP Bank S.A. and Banca Transilvania S.A., merged by absorption, with the assets of OTP Bank S.A. (the absorbed company) being transferred with universal title to Banca Transilvania S.A. (the absorbing company);
- By the BoD Decision No. 2/29.07.2025, the directors decided to move the registered office of BT Leasing Transilvania IFN SA to the following address: Cluj-Napoca, No. 77, 21 Decembrie 1989 Boulevard, The Office Building, blocks C-D, second floor and ground floor, Cluj County;
- By EGSM Decision No. 1/15.09.2025, the shareholders decided to modify the secondary object of activity of the company as follows:
 - Removal from the secondary object of activity of the following activities, with the corresponding CAEN codes:
 - 5224 – Handling;
 - 5590 - Other accommodation services;
 - 6619 - Activities auxiliary to financial intermediation, except insurance and pension funding;
 - 6630 - Fund management activities;
 - Add new activities as follows:
 - 6622 - Activities of insurance agents and brokers (insurance distribution activities as an auxiliary assistant, only for insurance products that are complementary to own goods and services, and where these insurance products include life and/or civil liability insurance risks, they may only be offered together with the goods or services offered as part of the main professional activity);
 - The shareholders decided to adopt new updated Articles of Association for the company.

BTP RETAIL S.R.L.

- On 13.02.2025, the sole shareholder of the company approved the increase of the company's share capital by a cash contribution of RON 1,000,000, from RON 3,100,000 to RON 4,100,000;
- On 03.04.2025, the sole shareholder of the company approved the increase of the company's share capital by a cash contribution of RON 800,000, from RON 4,100,000 to RON 4,900,000;
- On 04.06.2025, the sole shareholder of the company approved the increase of the company's share capital by a cash contribution of RON 4,000,000, from RON 4,900,000 to RON 8,900,000.

INNO INVESTMENTS SAI S.A.

- By the Decision of the Directorate no. 2/10.03.2025 and Resolution of EGMS no. 2/11.03.2025 it was decided to remove the following activities from the company's Articles of Association:
 - Management of individual investment portfolios, including those held by pension funds, on a discretionary basis, in accordance with the mandates given by investors, where these portfolios include one or more financial instruments;
 - Related services:
 - (i) investment advice on one or more financial instruments;
 - (ii) custody and administration activity related to the securities of collective investment undertakings;
- By the Decision of the Directorate no. 1/11.04.2025 it was decided to eliminate the following secondary objects of activity:
 - Financial transactions intermediation activities - CAEN code 6612;
 - Activities auxiliary to financial intermediation, except insurance and pension funding– CAEN Code 6619;
- In this regard, the FSA issued the Authorization no. 49/30.04.2025;
- By EGMS Decision no. 1/11.03.2025 it was decided to carry out the formalities regarding the transfer of the 573,738 shares of the company from OTP Bank Romania S.A. to Banca Transilvania S.A., following the admission by the Trade Register Office of the Cluj Tribunal, by the closing date of 28.02.2025 of the request for merger by absorption between Banca Transilvania S.A., as the absorbing company, and OTP Bank Romania S.A., as the absorbed company;
- By the Decision of the Directorate no. 1/21.03.2025 it was decided to move the company's registered office to Bucharest, Sos. Bucharest Ploiesti, no. 43, 2nd floor, Sector 1., with the FSA issuing Authorization no. 39/14.04.2025 to this effect;
- By Decision of the Supervisory Board no. 1/21.03.2025, considering the expiry on 01.06.2025 of the term of office of Mr. Popovici Dan Marius as General Manager, it was decided to appoint Mr. Micu Vlad Teodor as Member and Chairman of the Management Board and Chief Executive Officer for a term of 4 (four) years, starting on 01.06.2025, with the duties related to these positions to be performed only after obtaining the authorization decision issued by the FSA;
- By the EGMS Decision no. 1/06.05.2025 it was decided to change the name of the company from OTP Asset Management Romania SAI S.A. to Inno Investments S.A.I. S.A., with the FSA issuing Authorization No. 52/14.05.2025 to this effect;
- By F.S.A. Authorization no. 78/18.07.2025, Inno Investments SAI S.A. was authorized as an Alternative Investment Fund Manager / Director (A.I.F.M.).

CODE CRAFTERS BY BT S.R.L.

- By the Decision of the General Shareholders' Meeting no. 1/24.03.2025 it was decided to appoint Deloitte Audit S.R.L. for the audit of the financial statements of Code Crafters by BT S.R.L. for the financial year ended December 31, 2024;
- On 27.03.2025, Ms. Simona Bucin was appointed as Deputy General Manager of the company, for a 4-year term starting on 01.04.2025.

IMPROVEMENT CREDIT COLLECTION S.R.L.

- By The General Meeting of Shareholders Resolution No. 1/15.12.2025, it was decided to relocate the company's new registered office in Cluj-Napoca, 21 Decembrie 1989 Blvd., no. 77, "The Office", building C-D, ground floor, Cluj county.

INTER TERRA S.R.L.

- By sole shareholder decision no. 1/04.07.2025, it was decided to move the company's registered office to Cluj-Napoca, Calea Dorobanților nr. 30-36, ground floor, county. Cluj, Romania;
- By the same decision, it was also decided to modify the company's objects of activity:
 - The main field of activity of the Romanian company will be group 682 - Letting and subletting of own or leased real estate, and the main activity of the company in Romania will be the activity specified in the Classification of Activities in the National Economy (CAEN Rev.3) under code COD CAEN 6820 –Letting and subletting of own or leased real estate;
- Other secondary activities of the company:
 - CAEN code 6812 – Real estate development (promotion);
 - CAEN code 6811 – Purchase and sale of own real estate;
 - CAEN code 6832 – Other activities related to real estate transactions on a commission or contract basis;
 - CAEN code 6421 – Activities of holding companies;
 - CAEN code 6422 - Activities of financing channels;
 - CAEN code 7010 – Activities of the directorates (centrals), centralized administrative offices;
 - CAEN code 7020 – Business and management consulting activities;
 - CAEN code 7491 – Patent brokerage and marketing services;
 - CAEN code 8110 – Combined support services activities;
- On 09.10.2025, the management of the sole shareholder, namely Investiții Alternative BT Property, was taken over by Inno Investments S.A.I. S.A. from BT Asset Management S.A.I. S.A.;
- Furthermore, Mr. Rareș Trif was revoked from his position as Director of the company and Mr. Dragoș Manolescu was appointed in his place, for a 10-year mandate.

BRD S.A.F.P.P. S.A.

- On 28.11.2025, the transfer of 323,488 shares of the company took place, with a total nominal value of RON 32,348,800, representing 100% of the value of the company's share capital, from SOGECAP S.A. and BRD-Group Société Générale S.A., as sellers, to Banca Transilvania S.A. and BT Investments S.R.L., as buyers, the new shareholder structure becoming:
 - Banca Transilvania S.A. holds 320,558 shares, representing 99.0942477% of the Company's share capital, with a nominal value of RON 100 each and a total nominal value of RON 32,055,800;

- o BT Investments S.R.L. holds 2,930 shares, representing 0.9057523% of the Company's share capital, with a nominal value of RON 100 each and a total nominal value of RON 293,000;
- On the same date, 28.11.2025, the mandates of the administrators and the General Manager of the Company ceased, they being replaced by the following:
 - o Ms. Anca Crăciun – Chairman of the BoD;
 - o Mr. Bogdan Duma – Member of the BoD;
 - o Mr. Mihai Rotaru – Member of the BoD;
 - o Ms. Corina-Mădălina Cojocaru – General Manager;
- On 11.12.2025. FSA issued Decisions no. 1186, 1187, 1188 and 1189 authorizing the new members of the Board of Directors and the new General Manager;
- By OGMS Decision no. 86/16.12.2025, it was decided to appoint the financial auditor Deloitte Audit S.R.L. to audit the financial statements of BRD S.A.F.P.P. S.A. and the BRD Privately Administered Pension Fund for the financial years 2025-2026, the term of office being 01.01.2025-31.12.2026;
- During the Board of Directors meeting on 30.12.2025, the following were decided:
 - o Modification of the Audit Committee, which will be as follows:
 - Simona Miloşoiu – BT Internal Audit Manager (president);
 - Bogdan Duma – Member of the BoD (member);
 - Mihai Rotaru – Member of the BoD (member);
 - o Modification of the Remuneration and Nomination Committee, which will be as follows:
 - Anca Crăciun – Chairman of the BoD (president);
 - Bogdan Duma – Member of the BoD (member);
 - Mihai Rotaru – Member of the BoD (member);
 - o Termination of the mandate of Executive Director of Mr. Nicu Mihail-Dan starting with 01.01.2026, in his place being appointed Ms. Corina Stoica, who will exercise the position only after obtaining the approval decision issued by FSA.

BTP ONE S.R.L. / BTP RETAIL S.R.L. / BTP STORE HUB ORADEA S.R.L. / BTP STORE HUB TURDA S.R.L.

- On 09.10.2025, the management of the sole shareholder, namely Fondul Imobiliar de Investiții Alternative BT Property, was taken over by Inno Investments S.A.I. S.A. from BT Asset Management S.A.I. S.A.
- Furthermore, Mr. Rareş Trif was revoked from his position as Director of the Company and Mr. Dragoş Manolescu was appointed in his place, for a 10-year mandate.

SALT BANK S.A.

- On 29.01.2025, the shareholders increased the share capital of Salt Bank by RON 250,000,000, bringing the share capital of Salt Bank to RON 669,760,000;
- On June 19, 2025, the transaction for selling Salt Bank's participation in its subsidiary Avant Leasing IFN SA has been completed. Following this event, Salt Bank no longer holds stake in other companies, meaning that the Salt Bank Group has ceased to exist; subsidiary participation, thus the Salt Bank Group ceased to exist;
- On 11.07.2025, the Board of Directors of Salt Bank nominated Mr. Vikram Tikoo for the position of Deputy Chief Technology Officer (CTO), who will take over this mandate after obtaining the prior approval of the National Bank of Romania ("NBR");

- Starting on 19.08.2025, Mrs. Luminita Runcan exercises the role of member of the BoD, having received the prior approval of the NBR for this role;
- On 19.08.2025, the mandate of Mr. Tiberiu Moisă as director of Salt Bank ended, in accordance with the decision of GMS of 27.06.2025;
- On 22.09.2025, the Board of Directors of Salt Bank nominated Mr. Robert-Mihai Anghel as Chief Executive Officer (CEO), who will take over this mandate after obtaining the prior approval of the National Bank of Romania ("NBR");
- On 22.09.2025, the BoD of Salt Bank decided to extend the mandate of the Executive Director (CEO) of Mrs. Gabriela Cristina Nistor until 27.02.2026;
- On 24.11.2025, the shareholders increased the share capital of Salt Bank by the amount of RON 134,620,000 (representing the cash contribution and issue premiums of the shareholders of Banca Transilvania and BT Investments, by issuing by the Company an appropriate number of new shares, with a nominal value of RON 0.10 (RON zero and ten pounds) each, fully subscribed and paid), the share capital of Salt Bank reaching RON 680,438,000;
- On 05.12.2025 Salt Bank was registered in the Register of Secondary Intermediaries -FSA as an affiliated agent for NN Life Insurance SA, unique code 500022
 - G01. Accident;
 - G02. Health;
 - V01. Life insurance, annuities and supplementary life insurance;
- On 02.12.2025 Salt Bank was registered in the Register of Secondary Intermediaries - FSA as an affiliated agent for Romanian Insurance - Asirom Vienna Insurance Group SA
 - G01. Accident;
 - G02. Health;
 - G03. Land transport;
 - G04. Rail transport;
 - G05. Air Freight;
 - G06. Marine, lake and river transport;
 - G07. Goods in transit;
 - G08. Fire and other natural disasters;
 - G09. Other property insurance;
 - G10. Motor civil liability;
 - G11. Air Transport Civil Liability;
 - G12. Civil liability for maritime, lake and river transport;
 - G13. Non-specific civil liability;
 - G15. Warranties;
 - G16. Financial losses;
 - G18. Support;
 - V01. Life insurance, annuities and supplementary life insurance;
 - V03. Life insurance and annuities related to investment funds;
- Starting with 29.12.2025, Mr. Vikram Tikoo exercises the role of Deputy CEO of Technology, following obtaining the prior approval of the NBR for this role.

BC Victoriabank SA

- On 28.02.2025, the mandate of Mr. Sorin Șerban as a member of the Management Committee with overall responsibility for risk management (CRO), expired. The redistribution of the responsibilities of the members of the Management Committee with overall responsibility for the Bank's risk management function (CRO) are as follows:

- Mr. Murat Sabaz (member of the BoD and the Risk Management Committee): supervision of the bank's risk management function;
 - Mr. Levon Khanikyan, Chairman of the Management Committee (CEO): issues related to human resources management in the subdivisions coordinated by the CRO;
- Following the Decision no. 71 of the Executive Committee of the National Bank of Moldova ("NBM") from 13.03.2025, Mr. Victor Țurcan was approved as a member of the BoD of BC Victoriabank SA, appointed by the decision of the EGMS of 26.08.2024;
- In the context of the finalized reorganization process through the merger between BC Victoriabank SA and BCR Chișinău SA, in accordance with Decision No. 71 of 13.03.2025 of the Executive Committee of the NBM and based on the decisions of the BoD of BC Victoriabank SA No. 181 of 12.01.2024 and No. 210 of 19.12.2024, the mandate of the member of the Management Committee (CBO corporate area) within the bank, was resumed by Mr. Vasile Donica, starting on 13.03;
- On April 11, 2025, B.C. Victoriabank S.A signed the agreement regarding the intention to acquire 100% of the share capital of the Non-Banking Credit Organization Microinvest S.R.L., according to BoD Decision no. 218 of 10.04.2025.
- On 22.05.2025, the bank's BoD appointed the Annual General Meeting of Shareholders for 27.06.2025, with the following agenda:
 - The bank's annual financial statements for 2024;
 - The bank's BoD report for 2024;
 - Reconfirmation of the audit firm and establishment of the amount of remuneration for their services;
 - Approval of the regulations for distribution of the bank's net profit for 2025;
 - Distribution of the bank's annual profit for 2024;
 - Approval of the Regulation of the members of the BoD of BC Victoriabank SA;
 - Approval of the Regulation on the remuneration of the members of the Board of Directors of BC Victoriabank SA;
 - Approval of a new version of the Articles of Association of BC Victoriabank SA.
- On 13.03.2025 and 16.07.2024, the Public Services Agency registered the amendments made to the Articles of Association of BC Victoriabank SA;
- On 10.07.2025, Mr. Henry Russell began exercising his responsibilities as a member of the Board of Directors of B.C. Victoriabank S.A.;
- On 1.08.2025, Mr. Bogdan-Dumitru Popa began exercising his responsibilities as a member of the Management Committee of B.C. Victoriabank S.A., the Head of Risk Management (Chief Risk Officer);
- On 1.10.2025, B.C. Victoriabank S.A. completed the acquisition of 100% of the share capital of O.C.N. Microinvest S.R.L., becoming its sole shareholder;
- In accordance with the Minutes of the General Meeting of Shareholders dated 27.06.2025, the update of the Articles of Association of Victoriabank was approved, with the new version coming into force on the date of registration, 01.12.2025.
- The legal grounds for amending the Bank's Articles of Association are as follows:
 - amendments to Law No. 1134 of 02.04.1997 on Joint Stock Companies regarding the partial transposition of Directive 2007/36/EC of the European Parliament and of the Council of 11 July 2007 on the exercise of certain rights of shareholders in listed companies, as last amended by Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC regarding the encouragement of long-term shareholder engagement;

- harmonization of the content of the Statute by compiling all Additional Acts concerning amendments and supplements registered in the Moldavian State Register of Legal Entities.

O.C.N. MICROINVEST S.R.L.

- Pursuant to the Sole Shareholder's Decision No. 1 dated 20.10.2025 of O.C.N. Microinvest S.R.L., the Company's Board was approved in both numerical and nominal composition, consisting of five (5) members, for a term of 12 months, as follows:
 - Dumitru Svinarenco;
 - Murat Sabaz;
 - Luminița Runcan;
 - Levon Khanikyan;
 - Cristina Sindile;
- Pursuant to Decision No. 4 dated December 4, 2025, of the Sole Shareholder of O.C.N. Microinvest S.R.L., Mr. Levon Khanikyan was appointed as Chairman of the Board of the Company for the duration of his term of office, in accordance with Article 7.1 of the Articles of Association;
- Pursuant to Decision No. 1 dated October 20, 2025, of the Sole Shareholder of O.C.N. Microinvest S.R.L., a new version of the Company's Articles of Association was approved;
- Pursuant to Decision No. 3 dated 11.11.2025, of the Sole Shareholder of O.C.N. Microinvest S.R.L., Deloitte Audit S.R.L. was appointed as the Company's external auditor for the audit of the financial statements of O.C.N. Microinvest S.R.L. for the financial years 2025–2027.

The activity of the subsidiaries and the Bank's shareholding in the subsidiaries are presented in ANNEX 1 of the present report.

d) Description of the acquisitions and/or sales of assets

The gross value of Banca Transilvania's investments in the Group, in accordance with the International Financial Reporting Standards endorsed by the European Union, is RON 1,373.5 million at the end of 2025, decreasing by 48.1% versus 2024, largely driven by the mergers between BT and OTP, between Victoriabank and BCR Moldova, as well as by recent acquisitions.

Banca Transilvania is engaged in ensuring that its subsidiaries have an adequate CAR (Capital Adequacy Ratio) level, contributing to the improvement of risk management, by involving the audit and compliance functions from within the Bank.

e) The main results of the assessment of the Bank's activity

Internal Audit

The Audit Committee The Audit Committee within the Board of Directors carries out its activities based on the applicable legal framework: Law No. 31/1990 on companies, Law No. 162/2017 on the statutory audit of annual financial statements and consolidated annual financial statements and on the amendment of certain legislative provisions, NBR Regulation No. 5/2013 on prudential requirements for credit institutions and the Rules of Organization and Administration of Banca Transilvania. The number of members and the powers of the committee are approved by the Board of Directors.

The Audit Committee is responsible for overseeing the performance of the external auditors and providing recommendations regarding their appointment, renewal of mandate, and remuneration. It also evaluates the functioning of the internal audit system, developed under the responsibility of the Internal Audit Division's management, which reports directly to the Board of Directors on this system. The Committee may issue recommendations to the Board of Directors regarding the effectiveness of the internal audit department's performance, as well as regarding the establishment and review of the remuneration of the head of this Division, in accordance with independence and objectivity requirements set out in the applicable regulations.

The committee members meet periodically with the Bank's external auditor to analyze matters arising during audit missions, as well as the responses provided by the Bank's executive management to those findings. During these meetings, the Committee also assesses the degree of objectivity and independence of the opinions expressed by the external auditors. The Committee monitors compliance with Romanian legal and regulatory requirements regarding the preparation, presentation, and audit of financial statements, including compliance with IFRS standards and regulations issued by the National Bank of Romania. In this context, the Committee reviews the external auditor's report on the IFRS financial statements and reviews and preapproves the Bank's IFRS financial statements prior to their submission to the Bank's Board of Directors. The full list of responsibilities delegated to the Committee is detailed in the Audit Committee Regulation, published on the Bank's website.

Audit Committee's Report for 2025

The Audit Committee consisting of three (3) independent non-executive members, held seven (7) physical meetings in 2025, in addition to holding a series of conference calls and in absentia meetings to review, discuss and approve specific topics. The attendance rate of the meetings presented below was determined considering both physical attendance and absences that were objectively justified, in accordance with the Bank's practices.

The members of the Audit Committee in 2025 were the following:

- Mr. Ivo Gueorguiev – Chairman of the Audit Committee; Independent non-executive director with extensive audit experience, attending seven (7) out of seven (7) meetings;
- Mr. Thomas Grasse – Member; Independent non-executive director with extensive audit experience, attending seven (7) out of seven (7) meetings;
- Mrs. Mirela Bordea – Member; Independent non-executive director with extensive audit experience, attending seven (7) out of seven (7) meetings.

During the meetings held in 2025, the Audit Committee addressed the following:

- Analyzing of the financial statements and the report prepared by the external auditor for 2024, focusing on the significant accounting and reporting aspects and their impact on the financial statements;
- Monitoring the effectiveness of internal control, internal audit, and risk management by analyzing specific reports prepared by the Bank's control functions and other relevant reports;
- Analyzing specific aspects of the NBR's reports and monitoring the implementation of the related recommendations;
- Monitoring the implementation of significant recommendations in the external auditor's letter to management;
- Establishing an annual audit plan for internal audit, together with the internal auditor;

- Overseeing the preparation of sustainability reports and the information included therein, to the extent that this task is not assigned to another committee.

The Audit Committee carried out an intensive supervisory activity, working closely both with the Bank's external auditor and the Deputy Chief Financial Officer (CFO) on matters related to the Bank's financial results, which were audited and reviewed by the financial auditor. Based on the analyses performed, the Committee issued recommendations to the Board of Directors regarding their approval.

Throughout the year, dedicated meetings were held for audit planning and reporting, attended by the external auditor, including sessions conducive in the absence of the management team, in line with best practices on independence and objectivity. The Committee also reviewed updated information provided by the external auditor and by the Bank's management regarding changes in Romanian legislation affecting credit institutions, with a particular focus on current and upcoming developments in IFRS financial reporting standards.

The Committee examined the effectiveness of the Bank's internal controls, working closely with both the external and internal auditors to closely monitor any identified deficiencies and to track the progress of remediation actions through ongoing analytical follow-up. In addition, the Audit Committee was briefed on the results of external inspections carried out by regulatory authorities. The Committee oversees the conduct of the statutory audit and is responsible for assessing and monitoring the independence and objectivity of the external auditor, as well as for reviewing the quality of the delivered audit reports. In this context, the Committee ensures that the relationship with the external auditor complies with applicable professional and regulatory standards.

External Audit

In 2023, the Audit Committee coordinated the selection process for the external auditor of Banca Transilvania for the audit of the financial statements for the 2023–2027 financial years, prepared in accordance with the International Financial Reporting Standards, pursuant to NBR Order no. 27/2010. The external auditor — Deloitte Audit SRL — was subsequently appointed by the Ordinary General Meeting of Shareholders of Banca Transilvania on 26 April 2023, based on the independence statement submitted to the Audit Committee and on the Committee's own assessment of the auditor's competence, objectivity, and ability to fulfil the mandate. Following its analysis, the Committee concluded that the external auditor is independent in providing audit services to Banca Transilvania and that it may also perform certain non-audit services within the limits set by the applicable regulatory framework.

During 2025, the Audit Committee did not identify any situations, risks, or elements that could question the independence of the external auditor or affect the integrity of the audit process conducted for Banca Transilvania.

1.1. General items of the assessment for the financial year ended December 31, 2025

The Eurozone economy displayed modest but improving growth in 2025. Quarterly GDP growth strengthened toward the end of the year, with fourth-quarter output rising by 0.4% q/q, translating into an estimated 1.5% annual growth rate. This performance modestly exceeded earlier expectations but masked considerable heterogeneity among member states.

Overall, Romania's macroeconomic environment in 2025 is defined by resilience and persistent vulnerabilities. Growth remains modest, constrained by fiscal consolidation, elevated inflation, and reduced household demand, while public investment and EU fund absorption have become the main engines of activity. Inflation, though expected to gradually moderate, remains high, and the fiscal deficit continues to evaluate the country's credibility and market confidence.

BT Group carried out two simultaneous mergers, in Romania and the Republic of Moldova: Banca Transilvania – OTP Bank Romania and Victoriabank – BCR Chişinău. Two strategic acquisitions were also completed: BRD Pensii, Pillar 2 and Pillar 3 private pensions player, and Microinvest, the market leader in microfinance in the Republic of Moldova.

The separate and consolidated financial statements prepared in accordance with the International Financial Reporting Standards adopted by the European Union (NBR Order no. 27/2010, as subsequently amended and supplemented) are presented below:

▪ Gross profit	RON 4,819.4 million
▪ Net profit	RON 4,095.3 million
▪ Total assets	RON 210,398 million
▪ Capital adequacy ratio (CAR) (without the profit of the second half of the year 2025 included)	22.71%
▪ Return on equity (ROE)	25.23%
▪ Market share in terms of assets	21.97%
▪ Liquidity Coverage Ratio	792.9%

1.2. Assessment of the Bank's operational level

The unit network of Banca Transilvania as of 31 December 2025: 531 functional units (excluding the Headquarters and the Regional Office in Bucharest), compared to 513 functional units at 31 December 2024. Currently, the Bank has also one branch in Italy.

On 31.12.2025, the Bank has a network of 2,031 ATM terminals, out of which 696 are multifunctional ATMs. Also, the Bank owns 577 BT Express terminals used for various operations other than cash withdrawals, has over 178,000 POSs installed and collaborates with over 8,000 e-commerce merchants.

Banca Transilvania is the leader in the card market, having over 8.1 million cards in its portfolio. The transactions made with the 8.1 million cards increased by 19% in 2025 compared to 2024.

Description of the main products supplied and/or services rendered:

The offer of Banca Transilvania has expanded during 2025 with products, services and campaigns aimed at individuals and companies, to support its client's activities effectively and continuously.

RON operations

- cash transactions;
- settlement operations;
- current accounts;
- current account subscriptions for individuals;
- establishment of deposits;
- Round UP savings account;
- loans granted to legal entities and individuals;

- Online loan for individuals;
- letters of guarantee;
- making payments in the Direct Debit and Standing Order system;
- the BT Ultra-Multicash electronic service;
- Internet Banking and Mobile Banking BT Pay / BT Pay Web and BT Go service;
- the electronic confirmation service of payments to customs (Vama On-Line);
- the Trezo Direct service;
- storage and storage in the treasury of objects and other values to be safeguarded;
- consultancy, economic and financial technical assistance, services at the Payment Incidence Center;
- services at the Central Bank Risks;
- information on the exchange rates practiced in the previous period;
- operations with government bonds;
- operations with cards in lei;
- factoring;
- co-financing projects from European funds;
- personal loan from BT Pay.

FCY operations

- foreign exchange market operations;
- establishment of deposits;
- loans granted to individuals and legal entities;
- cheque operations;
- payment order operations;
- operations with documentary letters of credit (export and import);
- operations involving cash collections;
- collateral transactions;
- sending letters of credit, letters of guarantee, amendments, investigations (Swift commissions);
- transfer of amounts in foreign currency (Western Union);
- payment of the visa fee;
- operations involving foreign-currency cards, etc.

Main products launched in 2025, in BT Pay & Retail:

- BT Pay chat;
- in-branch identification via BT Pay;
- a diaspora boarding + free card delivery Italy, Spain, Germany, Great Britain, and Moldova;
- BT Pay Italia;
- negotiated deposits;
- closing of the sub-account;
- notification instead of SMS to P2p;
- pay with BT Pay using Star points;
- savings and deposits account extracted;
- issuance of the interest statement;
- amendment of the limit from RON 5 to RON 1;
- card saved at the Mastercard merchant;
- dark theme;

- view garnishment;
- McLaren cards;
- Untold cards;
- BT Pensions;
- Italy mirror account – loans and investments tab;
- Ro Pay, Ro Pay Alias, Click to Pay Mastercard, Click to Pay Visa;
- authorized persons (Switch profile);
- issuance of a Visa Platinum Debit holder card;
- recurrent treasury;
- BT Pay web;
- change of language: Hungarian;
- redesign of virtual cards for the Winter Olympics;
- RCA insurance in installments;
- credit line insurance from BT Pay;
- the online loan in BT Pay;
- the Private and Private+ subscription for Private clients;
- the Premium Club subscription;
- Visa Classic, Gold, Direct, Mondo debit cards.

Main products launched in 2025 for legal entities ("PJ"):

- online account opening from BT Go (for companies with a single administrator);
- BT x Danubius BlueCash50 – cash register and POS integrated in the same device;
- payment of salaries from BT Go;
- viewing and trading investment funds from BT Go;
- issuance of cards from BT Go;
- total repayment of the loan from BT Go;
- current account for notaries;
- redesign of the Mastercard Business card in euros.

Main products that were launched in the first two years of 2026 for individuals ("PF"):

- rebranding the debit card portfolio;
- real estate insurance from BT Pay;
- transfer of Star points from one card to another;
- e SIM;
- accelerator Round Up;
- child connection and child card issuance;
- early repayment of loans;
- home insurance;
- integration of code into the investment process.

Main products to be launched in 2026 for PF:

- KidCONT from PT Pay;
- Change PIN;
- integration of BT Trade into PT Pay;
- physical McLaren euro card;
- new BT Pay design;
- application for the credit card (Star Gold, Star Platinum, Flying Blue) from BT Pay.

Main products to be launched in 2026 for PJ:

- online account opening from BT Go (for the rest of the companies);

- online credit from BT Go;
- redesign of the rest of the business card portfolio;
- POS App for IOS;
- BT Mic loan directly from BT Go;
- partial repayment of PJ loans from BT Go;
- Credit Points relaunch (for Startup Nation projects).

In addition to the data presented above regarding the description of the products, we make the following clarifications:

- The main sales markets for each product or service and the distribution methods are the domestic and international banking markets. The entire range of financial products, both banking and those offered by BT Group subsidiaries, is available to customers through a single distribution network, under the BT brand;
- the share of each category of products or services in the bank's revenues and total turnover are presented in the Consolidated and Individual Annual Financial Statements prepared in accordance with the International Financial Reporting Standards adopted by the European Union, for the financial year ended December 31, 2025;
- The planned new products and services, for which a substantial amount of assets will be allocated in the next financial year, include the following:
 - New functionalities in BT Pay and BT Go applications;
 - New current account subscriptions for individual customers;
 - BT Italia campaigns for individual customers;
 - Online onboarding for legal entities;
 - Online loan for legal entities.

1.3. Assessment of the technical and material supply activities (domestic and foreign sources)

This item is not significant for the Bank.

1.4. Assessment of the operational activity

BT continued to be the main lender of the Romanian economy, mobilizing the highest level of resources in the banking system to provide financing to companies, to population, and for strategic projects in Romania.

The number of active clients increased by over 9% in 2025, as compared to 2024, from 4.57 million to 4.99 million.

The number of active clients structured by business lines is the following:

Active BT clients*	12/31/2025	12/31/2024	2025/2024
Large Corporate clients	1,750	1,509	16.0%
Mid Corporate clients	9,029	8,761	3.1%
SME clients	26,218	25,002	4.9%
Micro Business clients	499,164	448,472	11.3%
Retail	4,448,962	4,088,127	8.8%
TOTAL	4,985,123	4,571,871	9.0%

* The classification of legal persons within the segments is regulated by internal rules which set the conditions for the classification of clients per business segments.

Banca Transilvania Financial Group Business Lines Performance

The entire portfolio of loans for companies at the level of the Bank represents approximately 60% of the total gross loans, with an almost equal division between the local currency and the foreign currency.

Large Corporate Customers

The Large Corporate business line focuses on financing large-scale projects, with a strategic impact in the transition to a sustainable economy. In this area, BT supports large companies that develop or operate critical infrastructure and investments with a high degree of complexity – for example from the production and distribution of renewable energy to extensive electric mobility networks or major energy efficiency projects. Investments in green buildings, low-emission transport and logistics, sustainable industrial modernization or resource management are prioritized, reflecting the Bank's commitment to facilitating the responsible development of sectors critical to the economy. At the same time, BT remains a solid partner for health, education and social infrastructure projects, where the transformative potential and positive effects at community level are significant in relation to the financial dimension of the beneficiary.

At The balance of gross loans related to the Group business line reached RON 36 billion (+12.6% versus December 2024), and at Bank level it reached RON 36 billion at the end of 2025, 22.4% higher than at the end of 2024.

With a share of 34% of the total loan portfolio, the Large Corporate segment focused on deepening long-term lending relationships, managing a loan portfolio almost double compared to 5 years ago.

Mid Corporate and SME Clients

The Mid Corporate, SME and Micro business line supports the development of Romanian companies through dedicated financing and banking solutions adapted to each stage of growth, with an expanding portfolio fueled by new loans and the integration of the portfolio taken over from OTP Bank.

The balance of gross loans at Group level increased by 3.5%, reaching RON 28.5 billion (2025 vs 2024), and at Bank level it increased by +16.7%, reaching RON 26.7 billion (2025 vs 2024)

BT has dedicated time and resources to efficiently improving the all-in-one banking platform for entrepreneurs, BT Go, which has become an adaptable business ecosystem with 544 thousand users and a transaction value of over RON 351 billion in volume, offering a useful set of features.

The platform is constantly evolving by introducing functionalities that meet the real needs of the entrepreneurial environment. Recent developments include recurring payments, the ability to open and close savings accounts directly from the app, as well as the expansion of customer services in Italy, which includes instant payments in euros and automatic verification of beneficiaries.

An important step in the development of the BT Go ecosystem is the introduction of the digital onboarding process for companies, which allows the opening of the business account 100% online, directly from the application, without physical documents and without going to the unit. Through this digital flow, eligible entrepreneurs can become customers of the bank in a fast and simplified way, using only the company's data and the identity document of the legal representative. This

functionality helps speed up the onboarding process and expand access to digital banking services for the entrepreneurial environment.

In addition, the application includes a series of advanced functionalities that extend the role of the platform beyond the transactional area, such as full online repayment of loans, instant issuance of business cards or access to investment instruments directly from BT Go.

These capabilities contribute to strengthening Banca Transilvania's position as a leader in the digitization of banking services dedicated to companies and in the development of a complete digital ecosystem for entrepreneurs.

Micro customers, part of the Mid Corporate & SME segment, have grown by 50% in the last 5 years, reaching 499,164 customers (+11.3% compared to 2024).

BT Mic (BT Microfinancing) continues to facilitate entrepreneurs' access to financing and business development services through the Stup initiative. The entrepreneurial community has exceeded 40,000 members, and the ecosystem built around it has generated over 10,000 business services purchased by entrepreneurs and over 7,000 digitization products purchased by 4,300 entrepreneurs. At the same time, Stup continues to contribute to the development of the entrepreneurial environment, with over 880 businesses launched within the community.

Retail Customers

BT has 4.9 million uniquely digitized customers. These customers use the internet and mobile banking service – BT Pay. We observe a clear trend of increasing interest in digitalization, customers increasingly preferring innovative solutions that allow them to easily and efficiently manage financial services in the digital environment such as virtual cards, credit and savings products, insurance, investments and private pensions.

In 2025, over 470,000 individuals became BT customers, along with the more than 130,000 customers migrated with the integration of OTP Bank Romania. A significant part of the newly enrolled customers in 2025 opted to open the account directly through the BT Pay application, without any visit to the Bank.

Banca Transilvania is the market leader in the field of cards, with 8.1 million cards in its portfolio. Purchases made with the 8.1 million cards increased by 19% compared to the same period last year.

The Bank reached over 5.7 million unique cards enrolled in BT Pay, Apple Pay, Google Pay, Fitbit Pay and Garmin Pay, and the number of phone payments at merchants in 2025 increased by 29% compared to 2024. At the same time, money transfers from cards enrolled in BT Pay are increasingly appreciated, their volume increased by 70% compared to the previous year.

As for the volume of non-card transactions made by individual customers through digital channels, they registered an increase of 24% compared to the same period last year.

At the end of 2025, Chat BT exceeded 1.5 million interactions. Thanks to continuous optimizations - fast and intelligent responses, multilingual support (RO, EN, IT, HU), dynamic customization, access to tutorials and resources, adapted insights - since the end of the year, over 80% of customers find their information on their own, and 20% of conversations are taken over by a consultant (conversion rate to live chat: 20%).

The Premium segment grew in 2025 to approx. 150,000 Premium and Private customers and has been expanded nationwide. BT now has Relationship Managers dedicated to Premium customers in most urban centers and a dedicated team of Virtual Relationship Managers nationwide. The Premium Banking offer was improved in 2025, with the launch of an exclusive product dedicated to Premium customers - the Premium Club Subscription.

Starting with August 2025, Banca Transilvania's customers can directly join, through the BT Pay application, to the optional pension funds (Pillar III) managed by BT Pensii. Since the launch of this functionality, more than 8,600 customers have chosen to save for the long term on one of the two optional pension funds - Pensia Mea and Pensia Mea Plus.

At Group level, retail customer loans exceeded RON 44.9 billion, up 10.4% compared to 2024, as a result of both the integration of the portfolios belonging to new acquisitions and as a result of organic growth.

Treasury

The Treasury activities in Banca Transilvania are complementary to other products and services offered to the customers of the Bank's five business lines.

The principles and the strategic objectives linked to the treasury activities are:

- The principle of precaution - with respect to the management of the Bank's liquidity surplus, the maturity date of assets and debts, the interest rate structure, and the market risks to which the Bank is exposed, in accordance with the risk limits established in the Bank's Risk Strategy and/or the regulations governing the Romanian banking sector;
- The principle of dispersion - concerning the counterparty exposures resulting from all specific treasury operations;
- Income maximization - under prudent conditions and considering the estimated multiannual evolution of the cyclical macroeconomic indicators;
- Develop strategies and pricing structures to help increase commercial lending as part of the balance sheet management / Asset and Liabilities Management process.
- And finally, developing hedging products and strategies for bank's customers, including market access and price distribution through digital solutions.

One of the main sources of income is given by transactions in the fixed income space, where there is an increased focus to decrease volatility in results by a larger allocation to held-to-collect portfolios, with the view of maintaining a large pool of eligible / HQLA instruments that provide easy access to liquidity in adverse market conditions. At times, this is coupled with different interest rate risk hedging strategies.

As in prior years, an important revenue vector is our spread business in different instruments and that is a direct consequence of an increasing customer base, both organic and by acquisition.

Following the general trend of the increasing number of operations at the entire Bank's level, the foreign currency exchange was also stimulated, showing an increase in the net income, which grew with 10.9% on a consolidated level compared to the previous year, reaching a level of RON 883.5 million in 2025.

2025 Statement of Financial Position

The situation of the financial position in 2025 in accordance with the International Financial Reporting Standards adopted by the European Union (NBR's Order No. 27/2010 as subsequently amended and supplemented) is presented below:

BT ended the year 2025 with total assets amounting to RON 210,398 million, 14.2% higher compared to the end of 2024. At consolidated level, total assets increased by 8,4% to RON 224,414 million.

Loans portfolio: At the end of 2025, Banca Transilvania's gross loan portfolio balance was 22.6% higher than at the end of 2024, even though in 2025 write-offs in amount of almost RON 167 million were performed.

The non-performing loan ratio (NPL ratio) according to the EBA is 2.40% as of December 31, 2025, and the coverage with total provisions of the non-performing loans according to the EBA is 178.9%.

Provision balance: In 2025, Banca Transilvania recorded a net impairment allowance on financial assets on other risks and loan commitments in amount of RON 622 million (including recoveries from previously written-of-loans).

The high level of provisioning reflects the Bank's prudent and preventive approach as well as the recommendations of the NBR and EBA.

The total balance of adjustments (impairment allowances) was RON 5,940 million as of December 31, 2025, increasing by 24% versus the previous year, the main contribution to this change is brought by the expected credit loss for stage 3 loans. The coverage ratio of the stage 3 provisions reached at the of 2025 a comfortable level of 69.5%.

Cash and current accounts with Central Bank: At Group level, there is an increase of 16.2% compared to the end of 2024, with the balance of cash and investments at the Central Bank reaching RON 25,499 million. At the level of the Bank, Cash and current accounts with Central Bank amounted to RON 23,224 million, being 37.4% lower compared to the previous year, but above the minimum acceptable level required by the Bank to cover liquidity risk. Cash and current accounts with Central Bank consist mainly of cash on hand and placements with central banks, 76% of the total balance being represented by the minimum required reserve held with the NBR (RON 17,672 million).

Placements to banks and public institutions: At Group level, placements to banks and public institutions increased by 20.7% compared to 2024, reaching RON 16,552 million and at the Bank level, the growth recorded is 6.3%, up to RON 14,476 million. As of December 31, 2025, placements to banks include reverse-repo bills, term deposits, loans and advances to credit institutions with maturity lower than three months which all are included in the individual and consolidated cash flows, of which over RON 2,749 million are related to reverse repo transactions.

Securities: At the Group level, the securities and derivative financial instruments increased by 1.2% compared to last year (RON 69,208 million) and by 2.8% at the Bank level, reaching RON 66,541 million, growth driven by the debt instruments category. The securities issued by the Central Administrations have the largest weight in this category.

The Group's **fixed assets** increased by 10.6% compared to 2024, thus registering RON 3,755 million, while at the Bank level it decreased by 16.4%, reaching RON 4,175 million. A significant

share is represented by the decrease in investments in subsidiaries, which reached RON 1,373 million at the end of 2025 from RON 2,645 million at the end of 2024.

Customer resources: Deposits attracted from customers increased by 4.4% at Group level, up to RON 175,250 million, and at Bank level they recorded +12% compared to the previous year and thus reached RON 168,862 million. As of December 31, 2025, 66% of deposits attracted are from individuals and 34% are attracted from legal entities.

Loan/deposit ratio for the Bank was 62.6% at the end of 2025.

The capital adequacy ratio continued to remain at a comfortable level of 22.71% (the net profit for the first half of 2025 being incorporated into own funds). An adequate level of capital and general financial indicators has been maintained, in line with banking prudence practices.

The equity of Banca Transilvania as of 31.12.2025 amounted to RON 20,092,024,330, of which:

- The share capital registered with the Trade Register on December 31, 2025, is represented by 1,090,322,225 shares with a par value of 10 RON/share, plus RON 86,501,040 as capital adjustment to inflation and surplus from the revaluation of fixed assets, used for the share capital increase but not realized until the date of the transition to the International Financial Reporting Standards adopted by the European Union;
- Premiums for conversion of bonds into shares: RON 28,613,972;
- Statutory reserves: RON 1,493,546,486;
- Banking risks reserves: RON 77,892,714;
- Reserves from change in fair value of financial assets measured at fair value through other comprehensive income, net of tax: RON -703,027,745;
- Reserves from the revaluation of tangible and intangible assets, net of tax: RON 31,510,999;
- Retained earnings (excluding the profit for the year and profit distribution): RON 1,789,661,266;
- Other equity instruments: 2,529,996,037 lei;
- Profit for year: RON 4,095,289,537;
- 5% Legal reserve fund from gross profit: RON -241,182,226.

Banca Transilvania issued additional Tier 1 capital instruments (AT1 bonds) in November 2025, with a volume of EUR 500 million. AT1 bonds are unsecured and subordinated bonds are perpetual and can only be cancelled by the issuer on predetermined dates. AT1 bonds include discretionary non-cumulative coupon payments, which allows them to be classified as equity in accordance with IFRS.

If the Group or Bank's CET 1 falls below 5.125% (i.e. if a triggering event occurs), the principal amount will be reduced. The issuer may, at its discretion, increase the amount (in whole or in part), compliance with certain conditions, including recording a positive result and fixing the triggering event.

Buffer to MDA restriction as of 31 December 2025: 485 bps (individual) and 380 bps (Group level).

Available distributable items (ADI) as of 31 December 2025: RON 4.7 billion.

Cost/Income ratio recorded a comfortable level of 44.4% in 2025, decreasing from 45.4% at the end of the previous year. Excluding the expense with the Turnover tax, Cost/Income Ratio would

have reached 39.4% at the Bank level. This ratio is under strict supervision, operating efficiency continuing to be one of the Bank's objective.

Operating income increased during 2025, reaching RON 11,661 million at Group level (+15.9% compared to 2024), and at the Bank level, RON 9,794 million (higher by 19% than the previous year).

The most important income categories are the following:

- Net interest income: RON 6,631 million in 2025 at Bank level, respectively RON 8,066 million at Group level, thus registering increases of 19.9% and 16.8% respectively compared to the previous year. Their growth reflects sustained commercial activity, both in terms of lending to households and companies. Debt instruments measured at amortized cost also generated higher revenues in 2025 compared to the previous year.
- Fee income: Net fee income increased by 9.1% at the Group level, registering RON 1,623 million and by 9.5%, reaching RON 1,388 million at Bank level. The continuous increase in the number of transactions and the number of active customers, as well as the diversification of the types of transactions made available to customers, have led to the increases recorded in this category.
- Net trading income: This revenue category increased by 26.4% at Bank level and by 30.8% at Group level. The increase is due to the recording of net income from financial assets held for trading.
- The net gain/(loss) related to the financial assets measured at fair value through the comprehensive result recorded a positive value of RON 66 million at the Bank level.
- The net gain/(loss) related to the financial assets mandatorily measured at fair value through profit and loss recorded a positive value of RON 434 million at the Bank level.

Operating expenses, before net impairment adjustments and provisions for other risks and loan commitments, increased by 12.0% and reached RON 5,441 million as of 31 December 2025 at Group level, compared with RON 4,859 million in 2024. At Bank level, these expenses grew by 16.4%, reaching RON 4,344 million as of 31 December 2025, compared with RON 3,732 million as at 31 December 2024.

The evolution of these expenses at Bank level was driven by the increase in the other operational expenses category, which recorded a 26.4% rise in 2025 compared to 2024. This category includes, among other items, the turnover tax expense, amounting to RON 487.2 million. The level of this tax doubled starting July 2025, increasing from 2% to 4%.

Personnel expenses: At Group level, the expenditure category increased by 4.0% compared to the previous year, and at Bank level they are 11.2% higher, being also determined by the adjustment of fixed salaries amid increased inflation, share payments to employees, as well as the expansion of the employee base.

The Bank also continued the program for performance rewarding, the Stock Options Plan, based on which the employees with good performances may exercise their right to purchase at a preferential price or to receive free of charge a certain number of shares issued by the Bank. The program generated for the Bank expenses worth of RON 141.5 million, up 17% compared to 2025.

The Group's operating result reached RON 6,220 million, 19.6% higher than in 2024, and the Bank's level is 21.1% higher than the previous year, reaching RON 5,442 million.

Net provision expenses: RON 832 million at Group level (including recoveries from off-balance sheet loans), while at Bank level were RON 622 million, maintaining a prudent risk approach.

The Group's gross profit in 2025 is RON 5,510 million, compared to RON 5,442 million. At the Bank level, the gross profit is RON 4,819 million, compared to RON 4,160 million, increasing by 15.9%.

At the level of the Banca Transilvania Financial Group, **the net profit** amounted to RON 4,661 million, representing a decrease of 1.5% compared to RON 4,731 million recorded in the previous year. However, excluding the impact of bargain gain, the net result would have reflected an increase of 16.0%. The net profit achieved in 2025 at Bank level is RON 4,095 million, up by 16.0% compared to RON 3,532 million reported in 2024.

At Group level, as of December 2024, **the gain from acquisitions** amounting to RON 816 million is represented by the gain from the acquisition of BCR Chisinau S.A. (RON 133 million which was determined as the difference between the consideration paid, RON 57 million and the fair value of the assets and liabilities of BCR Chisinau S.A. on the date of taking control, RON 190 million) and the gain from the acquisition of the OTP group (RON 683 million, which was determined as the difference between the consideration paid, RON 1,722 million and the part of the fair value of the assets and liabilities of OTP Bank Romania S.A. and the other OTP subsidiaries at the date of taking control, RON 2,405 million).

The gain from the acquisition of O.C.N. Microinvest S.R.L. in amount of RON 120 million does not constitute a taxable transfer for the difference between the market price of the transferred assets and liabilities and their tax value. The Bargain gain was determined as the difference between the consideration paid (RON 332 million) and the part of the fair value of the assets and liabilities of O.C.N. Microinvest S.R.L. on the date of taking control (RON 452 million). The amount is recognized in Statement of Profit or loss under the line "Bargain gain" of the consolidated and separate financial statements.

The gain from the acquisition of BRD Societate de Administrare a Fondurilor de Pensii Private S.A. of RON 1.2 million was determined as the difference between the consideration paid (in the amount of RON 55.5 million) and the fair value of the company's assets and liabilities at the date of taking control (in the amount of RON 56.7 million).

1.5. Assessment of the aspects related to the Bank's and the Group's employees/staff

The Group's number of active employees as of December 31, 2025, was 13,361 (2024: 13,629 employees).

The Bank's number of active employees as of December 31, 2025, was 10,180 (2024: 9,744 employees). The values include the number of employees of BT Italy.

The average age of employees in 2025 was 39 years (2024- 39 years). Breakdown per genders 2025: 73% women and 27% men (2024- 71% women and 29% men).

Within Banca Transilvania S.A., the employment relations in 2025 were regulated by the Collective Labor Agreement no. 237/17.08.2023, starting with September 2025 by the Collective Labor Agreement no. 302/10.09.2025 and the Internal Order Regulation (R.15.9.). The relations between

the manager and the employees, as well as any conflicting elements that have arisen, have been investigated and resolved based on these regulations.

The priorities in the Human Resources area were focused on attracting, developing and retaining talent, with a focus on the skills of the future, managerial performance and adaptation to market transformations. These directions were aligned with Banca Transilvania's strategic objectives and supported the organization's ability to respond to a constantly evolving economic and technological environment, through investments in continuous learning, leadership, digitalization and employee experience.

The development of a constructive organizational culture is a constant concern of the Bank, with the desire to facilitate a better collaboration between employees to achieve objectives and their involvement in their own professional development, with the desire for Banca Transilvania to remain a workplace where employees come with pleasure, build authentic relationships and have real opportunities for development.

1.6. Assessment of the aspects related to the environmental impact of the issuer's main activity

Although at the level of the banking system the environmental impact is largely indirect, generated by the projects that the Bank chooses to finance, and by some of the daily administrative activity.

Banca Transilvania continued to advance ESG (Environmental, Social and Governance) initiatives that support Romania's sustainable development—by scaling green finance, embedding responsible practices across the Group, and partnering on programs that accelerate the country's climate and social priorities.

BT has further raised its green-lending target to companies to RON 6.5 billion for 2025–2028, after reaching RON 2.15 billion in green financing (+20% as compared with prior year). The green loan production in 2025 was predominantly allocated to green building projects (RON 938 million), renewable energy (RON 859 million), and dedicated climate initiatives (RON 320 million).

The outstanding green loan to companies reached RON 4.2 billion, split as follows: RON 1.9 billion in renewable energy projects, RON 1.8 billion in green commercial buildings, RON 270 million in special climate projects, RON 130 million in energy efficiency projects, RON 70 million in blue finance projects and RON 30 million in clean transportation projects.

In 2025 BT originated approximately 3,500 green mortgages, totaling RON 1.2 billion (+142% as compared to 2024), accounting for 8.48% of total mortgage production in 2025 (versus 5.27% in prior year). The outstanding green loan portfolio to Retail segment amounts to RON 2.94 billion (+30% versus prior year).

In 2025, BT Leasing financed the acquisition of more than 9,500 hybrid and electric vehicles Leasing, with total financing of approximately RON 1.9 billion, (+54% as compared with 2024). As of 31 December 2025, around two-thirds of BT Leasing's financed portfolio consists of hybrid or electric vehicles.

During 2025, Banca Transilvania issued its third sustainable bond in a row, reaching a portfolio of EUR 1.5 billion of sustainable bonds, a premiere for CEE (Central and Eastern Europe) region. The

sustainable bond issuance activity continues to channel funding into renewable energy, green buildings, clean transport, healthcare, education, and MSME inclusion—helping to deliver measurable environmental and social outcomes while supporting Romania’s long-term transition. BT published its second edition of its Impact and Allocation Report in June 2025.

Over 380 community projects, run by over 350 partners, were supported by BT. The total investment in CSR (Corporate Social Responsibility) projects amounted to RON 87 million.

Through the BT Pay app customers shared over RON 2 million to sustain different CSR causes

Some of the most prominent projects in 2025 carried by Banca Transilvania were: “FIT – Finanțe pe înțelesul tuturor” (financial education), “Stai un pic înainte de click” (online security), “Via Transilvanica” (promoting Romanian tourism)

BT continued to be a supporter of major cultural and sports events from Romania during 2025.

1.7. Assessment of the research and development activities

The research and development activity consists of investments in technology, digitization, innovation, and process improvement/simplification.

1.8. Assessment of the Bank’s activity regarding risk management

Credit ratings

The recent assessments by Moody’s and Fitch outline a complex risk profile, in which BT’s structural strengths coexist with macroeconomic and sovereign pressures that directly influence the rating outlook. These effects are reflected across the main risk categories: sovereign, credit, capital, liquidity, and operational risk.

In November 2025, Moody’s Ratings upgraded Banca Transilvania S.A.’s long-term deposit ratings to Baa1 from Baa2 and revised the outlook to negative from positive. At the same time, it upgraded the Bank’s long- and short-term issuer ratings to Baa2/P-2 from Baa3/P-3 and changed the outlook on the long-term issuer rating to stable from positive.

The confirmation of the basic rating (Ba1) reflects BT's solid capitalization and robust profitability, supported by its leading position in the Romanian Banking market and a good operational efficiency.

The stable outlook on the Bank's long-term issuer ratings reflects the Bank’s financial performance, and the expectation that its capital and profitability will remain resilient despite macroeconomic headwinds.

In 2025, Fitch maintained Romania’s and Banca Transilvania’s sovereign and Bank ratings at BBB-, thereby preserving their Investment Grade status, but reaffirmed the negative outlook due to persistent macroeconomic imbalances.

The Fitch rating reflects Banca Transilvania's solid and well-established position in the Romanian banking system, as well as robust capital buffers supported by strong internal capital generation, a stable funding profile and reasonable asset quality, underpinned by conservative underwriting.

The result confirms BT's track record in prudent risk management, sound lending policy, as well as the Bank's operational efficiency.

The objective of Banca Transilvania Financial Group in terms of risk management is the integration of the risk appetite within the Bank's decision-making process, by promoting the adequate balance between the assumed risks, the available capital and the performance targets, considering at the same time the tolerance to financial and non-financial risks.

In determining its appetite, capacity and risk tolerance, the BT Financial Group shall consider all material risks to which it is exposed taking into consideration the specificity of its activity, business model, strategic and operational objectives, and applicable capital and liquidity requirements, its own risk management and control capacities, as well as the regulatory constraints.

The risk appetite within the Banca Transilvania Financial Group defines the maximum level the Group is willing to accept in order to achieve its strategic and business objectives. The overall approach is structured through the Risk Appetite Framework, which includes the Risk Appetite Statement (RAS), quantitative risk limits complemented by qualitative principles, as well as clearly defined roles and responsibilities for implementation and oversight.

Risk tolerance represents the level and types of risks that the Bank, although not deliberately seeking to assume, is willing to accept under certain conditions, within a rigorous control environment. It reflects the concrete operational boundaries of the risk appetite assumed at the institutional level.

The risk management framework within the BT Financial Group is based on the following principles that apply to all activities and risk types:

- the existence of a solid culture in terms of risk management, both at the level of the Group's structures and at the level of its business lines;
- protection of financial stability: The Group controls the risk in order to limit the impact of potential adverse events on capital and profitability;
- limiting excessive risk-taking; the Group's risk appetite and tolerance must be consistent with its financial resources;
- ensuring a sound and sustainable capital and funding base;
- independent perspective: the risk management function is structured so as to identify, assess, monitor and report risks; the risk management function, as well as the compliance and internal audit functions operate independently of the activity lines that they monitor and control, in order to ensure the integrity of the Bank's control processes;
- portfolio diversity in order to prevent dangerous concentration risks;
- limiting concentrations and volatility of income sources;
- homogenous approach and global risk monitoring at Group level;
- compliance with the rules and regulations imposed by national and international authorities in the field;
- existence of certain operational continuity plans for the banking activities;
- drafting and periodic revision of the recovery plan at the level of the BT Group;

BT Financial Group does not carry out activities in jurisdictions that reduce transparency, such as offshore jurisdictions, or via certain structures that decrease transparency.

Risk management is an integral part of all decisional and business processes that take place in the Banca Transilvania Financial Group and in this regard, the management team:

- continuously assesses the risks likely to affect the Bank's business and goals and takes actions whenever any changes appear in its business conditions.
- ensures the existence of an adequate activity management framework within the Group, considering both internal factors (the complexity of the organizational structure, the nature of the activity, staff quality and fluctuation) and external factors (macroeconomic factors, legislation changes, competition changes in the banking sector, technological progress);
- identified the risks: The Group's exposure to inherent risks through day-to-day operations and transactions (including lending, dealing, capital market activity, asset management, and other specific activities) is identified and aggregated through the risk management infrastructure implemented at the Group Level;
- assesses/measures risks: An evaluation of the identified risks is carried out through specific models and calculation methods: a system of ratios with related limits, a methodology for assessing risk events likely to generate losses, calculation methodology for specific credit risk provisions, assumptions regarding the future evolution of assets' value, etc.;
- monitors and risk controls: The policy and the procedures implemented for effective risk management are meant to mitigate risks inherent to the Bank's business. The Bank implemented procedures for the supervision and approval of decision and trading limits per person/ unit/ product etc. Such limits are monitored daily/ weekly/ monthly depending on operations.
- reports the risks: Periodic and transparent reporting mechanisms have been established for specific risk categories so that the management body and all relevant structures benefit in a timely manner from accurate, concise, intelligible, and meaningful reporting, but can also exchange relevant information on the identification, measurement or assessment and monitoring of risks;
- calculates and evaluates internal capital and internal capital requirements: In order to assess the adequacy of the internal capital to risks at Group level, all the significant risks to which the Group is or may be exposed are identified and assessed, by a continuous evaluation of the internal capital and internal capital requirements, to cover the Bank's business needs and of the related risks, including through stress tests.

The risk management framework includes internal regulations, risk limits and risk control mechanisms, adapted to the proper functioning, financial soundness, capital base and strategic objectives of the credit institution, which ensure proper, timely and continuous identification, assessment, monitoring, mitigation and reporting of the risks related to the Bank's activities, as a whole, as well as at the business lines' level (Large Corporate, Corporate, SME, micro and retail).

The main risk categories to which the BT Group is exposed are:

- Credit risk;
- Liquidity and credit risk;
- Operational risk;
- Market risk;
- Interest rate risk in banking book;
- Counterparty credit risk.
- Reputation risk;
- The risk associated with excessive usage of leverage;
- Strategic risk;

- Capital risk;
- Compliance risk;
- ESG risk.

Banca Transilvania aims to maintain a balanced risk profile, calibrated at a medium level, in line with its business model and sustainable growth strategy. The risk appetite for each significant risk is explicitly defined within the corresponding governance framework and is continuously monitored through a structured set of relevant indicators.

These indicators allow for the continuous assessment of the risk position, the early identification of deviations from established limits, and ensure that operational and strategic decisions are carried out within the boundaries of the risk profile assumed by the Bank.

Credit risk

Banca Transilvania manages credit risk in line with a solid risk management culture, emphasizing portfolio quality, capital protection, and sustainable value creation. Credit risk governance is embedded within a fundamental internal regulatory framework, which includes the risk strategy, the general lending standards, and rules applicable to both individuals and legal entities, the counterparty and country risk policies, as well as the procedures associated with collection, remediation, and restructuring processes. Taken together, these documents define the principles, risk thresholds, and responsibilities regarding the assumption of credit risk across all business segments.

The credit risk coordination process ensures that exposures are originated, monitored, and managed in accordance with the Bank's strategic objectives and risk appetite, both qualitative and quantitative, as approved by the Board of Directors. Internal rules are periodically updated to ensure alignment with evolving regulatory requirements.

The Bank applies a differentiated approach to credit risk, tailored to the specific characteristics of each portfolio, and grounded in internal models, prudent assessment processes, and strong governance principles.

The methodologies used ensure rigorous client creditworthiness assessment, appropriate collateral structuring, and continuous monitoring of exposures, contributing to the maintenance of a balanced and sustainable portfolio.

- Large Corporate & Corporate Portfolio
 - The Bank offers both standard products and customized financing solutions tailored to clients' specific needs.
 - financing conditions vary depending on the debtor's risk profile, including thresholds regarding maximum loan amounts, collateral levels, and pricing structure.
 - the internal rating acts as a central tool in eligibility assessment, being used to determine collateral requirements and differentiated pricing.
 - ESG assessment is integrated into the credit decision process to ensure long-term sustainability and resilience of the portfolio.
- SME & Microenterprise Portfolio
 - risk assessment combines qualitative and quantitative factors reflecting the operational specifics of the SME segment.
 - The Bank uses internally developed scoring models, statistically validated and calibrated according to turnover, entity type, and client exposure.

- three separate scoring models are applied: SME, Micro, and Sole Proprietors (PFA), each adapted to the specific profile of the segment.
- for PFA/II/IF clients, the assessment relies primarily on qualitative criteria (transaction history, payment behavior, location, sector of activity).
- **Retail Lending Portfolio**
 - clients are classified into risk categories based on scoring models that integrate internal data, information from the Credit Bureau, and socio-demographic variables.
 - the scoring reflects the probability of default and is used to determine eligibility and pricing structure.
 - debtors exposed to foreign exchange risk or fixed-rate risk are informed about the potential negative impact of adverse exchange rate or interest rate developments, through explicit scenarios presented during the granting process.
- **Interbank Exposure Portfolio**
 - The Bank aims to minimize losses and maintain risk-adjusted profitability in its relationships with banking counterparties.
 - exposure limits are set based on the counterparty rating, the risk appetite, and own funds, complying with the maximum concentration threshold of 25% of Tier 1 capital.
 - exposures are monitored daily using automated systems and early-warning indicators to identify risk deterioration.
 - mitigation mechanisms include rating adjustments, limit reviews, and transferring counterparties to enhanced monitoring.
- **Sovereign Exposure Portfolio**
 - country exposure limits are established according to the Risk Appetite Framework and external ratings and approved by the Financial Institutions Credit Committee.
 - exposures are reviewed annually and adjusted based on updated risk assessments.
 - no formal limit is applied for Romania, given its strategic importance and compliance with capital and concentration requirements.
 - exposures to foreign entities are monitored only in countries where relevant activity exists, and limits are tracked daily and adjusted through clear procedures in case of breaches.
 - external ratings are updated monthly to accurately reflect developments in international markets.

The credit risk management at the level of the BT Group is realized by:

- **governance framework, policies, and organizational structure:** the Group operates based on a unified internal framework of strategies, policies, and rules, reviewed periodically to ensure alignment with the risk appetite and prudent lending practices. Governance is supported by a dedicated organizational structure, with clearly defined roles and responsibilities for credit risk oversight;
- **management and monitoring:** the entire credit lifecycle is managed through coherent processes of approval, monitoring, and control, supported by periodic reporting and independent assessments. Regular reviews are conducted to enable early identification of risk elements and the implementation of corrective measures, facilitating the optimization of lending rules, the updating of policies, and the setting of sectoral limits in line with the risk appetite;
- **internal credit risk models:** internal rating systems are continuously enhanced and subject to periodic reviews, calibrations, and validations, in accordance with model risk governance, as part of each model's lifecycle;

- collateral management: control over collateral quality and coverage is strengthened through diversification, rigorous eligibility and valuation criteria, appropriate protection mechanisms, and periodic independent revaluations, with residual risk monitoring and reporting to management for timely decision-making.

The credit risk appetite is continuously monitored through a set of supporting indicators and strategic limits that reflect both portfolio quality and the evolution of risk over time, while the internal customer rating represents a central element in assessing and tracking this risk, contributing to a prudent and proactive framework for managing exposures.

Liquidity and credit risk

The appetite for liquidity and funding risk is continuously monitored through a set of supporting indicators and strategic limits, which reflect the structural correlation of the Bank's assets and liabilities, as well as the evolution of risk over time, contributing to stability and ensuring meeting obligations capacity. The purpose of liquidity risk management is to obtain the expected returns on assets by taking advantage of temporary excess liquidity and through an efficient allocation of the resources attracted from customers, in the context of a proper management, consciously assumed and adapted to the Romanian and international financial-banking market conditions, as well as the general economic context, the current legal framework and the development targets of the BT Financial Group. Liquidity management is realized centrally and aims to combine prudential requirements with profitability requirements.

In liquidity management, Banca Transilvania applies a series of principles regarding the quality, maturity, diversity and degree of the assets and liabilities risks, while establishing carefully monitored limits to ensure compliance with the principles and also with the set returns (concentration, liquid, eligible assets etc.).

For a sound liquidity risk management, BT is constantly focused on obtaining liquidities via treasury operations, external financing, capital markets, etc., by considering various factors such as the issuer's rating, the issuance maturity and volume of the exposures and the analysis of the markets on which it trades.

The operative (intraday) liquidity management is realized through all the operations carried out by the Bank's departments, so as to ensure the performance of all the payments / payments of the Bank carried out by the Bank on its behalf or on behalf of its customers, in RON or FCY, on the accounts or in cash, within the internal, legal and mandatory limits.

BT also takes into account a liquidity reserve (buffer), in order to cover the additional liquidity, need that may arise over a short period of time, under stress conditions, periodically tested based on different crisis scenarios.

During 2025, the Bank recorded very good levels of liquidity indicators thus demonstrating a solid position, registering a more than comfortable liquidity level in a fragile overall economic context.

Also, attention is given to:

- correlation of the growth rate of resources/loans;
- diversification of the range of instruments used and of the IT systems, correlated with the institution's risk appetite;
- monitoring of liquidity coverage ratio (LCR) and the net stable funding ratio (NSFR)

- adequate capital allocation.

Operational risk

Operational risk represents the risk of direct or indirect loss resulting either from the use of inadequate internal processes, internal systems, and human resources, or from their failure to function properly, as well as from external events and actions.

The objective of managing operational risk within the Banca Transilvania Group is to support sustainable and controlled growth of the Bank's activity by integrating a solid and adaptable risk management framework. Through a proactive approach to risks, Banca Transilvania aims to support responsible business development while maintaining operational resilience and compliance with applicable regulations.

This framework enables identification, assessment, monitoring, and mitigation of operational risks in line with the assumed risk appetite, thereby contributing to protecting the organization's value, ensuring operational continuity, and achieving strategic objectives.

The key principles of the operational risk management framework are:

- clear governance and responsibilities – through dedicated structures for operational risk management (committees, risk functions, internal audit) and the application of the “three lines of defense” model, ensuring separation of responsibilities and independence of control functions;
- risk-oriented organizational culture – by promoting a risk-aware culture at all levels of the organization, continuous training, internal communication, and encouraging proactive incident reporting;
- identification and assessment of risks (including conduct risk) through process mapping and assessment of associated risks, periodic evaluations, stress scenarios, and the use of RCSA (Risk and Control Self-Assessment) methodologies;
- formal Product Approval Process, with the involvement of risk and compliance functions;
- fraud risk management;
- management of ICT and cybersecurity risks through continuous assessment of risks associated with information technology, including data security, system availability, integrity of digital processes, monitoring of emerging risks, and alignment with applicable regulations;
- effectiveness of internal controls and mitigation measures through the implementation of preventive, detective, and corrective controls, process automation, workflow standardization, and reduction of data redundancy;
- ongoing monitoring and reporting;
- incident management and integration of lessons learned;
- business continuity and operational resilience through the development and periodic testing of Business Continuity Plans (BCP) and Disaster Recovery Plans (DRP), assessment of risks associated with critical processes, and strengthening the organization's capacity to respond efficiently and in a coordinated manner during crisis situations.

Market risk

The market risk appetite is continuously monitored through a set of support indicators and strategic limits, adapted to the structure and size of the financial instruments portfolios, ensuring

the monitoring of risk evolution over time, contributing to maintaining a prudent and proactive risk management framework. In order to reduce the market risk, the Bank adopted a prudential approach to protect its profits from fluctuations in prices, interest rates, and exchange rates on the market, which all represent exogenous, external, independent factors. The Bank implements a series of principles in terms of quality, maturity, diversity, and risk degree of the constitutive elements of the financial instruments portfolios. (securities, shares, fund units).

Banca Transilvania performs a daily evaluation for financial instruments portfolios, utilizing directly available closing prices, coming from independent sources, such as prices on the stock exchange, electronic quotations, quotations from several independent, well-known brokers, in accordance with the applicable internal regulations and monitors daily variations, using backup plans, immediately applicable, in case of unstable market conditions.

The market risk analysis is based on the two main risk sub-categories listed below, with the purpose of combining the prudential and profitability requirements:

- Interest rate and pricing risk: The management of this type of risk is adapted and permanently adjusted to the Romanian and international financial-banking market conditions and the general economic background. The interest rate risk is monitored daily and tested in crisis simulations performed for the Bank's securities portfolio, and the price risk is also monitored daily and tested in crisis simulations related to the portfolios of shares and funds units held by the Bank;
- FX Risk: It represents the risk of recording losses related to the on-balance sheet and off-balance sheet positions due to unfavorable market fluctuations in the exchange rates. The Bank applies a series of rules regarding operations/positions sensitive to exchange rate fluctuations, the realization, registration, and mark-to-market thereof, as well as the impact of exchange rates on the Bank's assets and liabilities.

Interest rate risk in Banking book

The interest rate risk appetite is continuously monitored through a set of support indicators and strategic limits, which reflect the maximum accepted level of impact on the economic value of equity and on net interest income, taking into account the business strategy, loss absorption capacity, market conditions, and the regulatory framework. The Bank has established a set of strict principles for managing and monitoring this type of risk, which is based on solid governance, comprehensive risk measurement, the use of robust models, EVE and NII analysis, and alignment with risk appetite. The interest rate risk management is to minimize the possible negative impact on the net income, as well as to preserve the economic value of the equity under the conditions of adverse fluctuations of the interest rates.

The Bank uses management tools such as economic value of equity and net interest income analysis, stress tests and economic hedge operations, as well as a governance framework and a system of indicators that ensure the maintenance of a prudent and proactive interest rate risk management framework.

A detailed analysis of the liquidity and funding, market and interest rate risks is available in the consolidated financial statements of the BT Group. These were within the risk limits assumed in the Bank's decision-making process, promoting an adequate alignment of the assumed risks, available capital and performance targets and at the same time taking into account the tolerance of both financial and non-financial risks.

Counterparty Credit Risk

Counterparty credit risk and settlement risk from exposures arising from derivative financial instruments and from transactions with over-the-counter financial instruments represents the risk of losses that may arise as a result of the counterparty failing to meet its contractual obligations. Banca Transilvania's objective regarding the management of counterparty credit risk is to adopt a prudent policy regarding the selection of counterparties, custodians, the management of operations carried out with counterparties and the maturities of the related operations. The main instrument for managing these risks is the counterparty limit system implemented for the various types of interbank transactions based on the rating calculated for each counterparty.

Reputational Risk

Reputational risk management is carried out by continuously monitoring the internal and external threats in terms of reputation, by considering the best partners (both in terms of customers and suppliers), recruiting and retaining the best employees, minimizing (legal) disputes, implementing rigorous controls on the activities, preventing crisis situations, permanently strengthening the credibility of the BT Financial Group, improving relations with shareholders, creating a more favorable environment for investments and access to the capital, and assuring a continuous and open communication with all stakeholders (shareholders, media, customers, partners, employees, authorities, etc.).

The Bank addresses the reputational risk through an integrated framework that combines prevention, monitoring, rapid reaction and strengthening stakeholder relationships. The main directions include:

- promoting an organizational culture based on ethics, transparency and responsibility, focusing on compliant behaviors and sustainable values, supported by training and awareness programs dedicated to the employees and management;
- integrating the reputational considerations into decision-making processes, the evaluation of the business initiatives and the approval processes for different products and projects, with the involvement of the relevant structures;
- media/ social-media monitoring, through automated tools and qualitative analyses, for early identification of sensitive issues;
- implementing a robust risk management system, by continuously monitoring the reputational threats, supported by a dynamic and adaptable system of indicators, continuously reviewed, to capture changes in the relevant factors;
- periodic assessment of the reputational risk, with formalized incidents reports to the competent structures;
- maintaining a procedural framework related to the management of the reputational crisis, which requires rapid and efficient reactions;
- cultivating trusting relationships with stakeholders, through proactive communication, financial education, involvement in social responsibility initiatives and the use of dedicated tools, to clarify and update expectations;
- ensuring compliance and internal control, by applying specific control systems to align with legal and corporate requirements.

Risk of Excessive Leverage

The risk associated with leverage reflects the possibility that excessive use of debt financing may lead to financial vulnerabilities, affecting the institution's ability to absorb shocks, maintain

operational stability, and comply with capital and liquidity requirements. This risk is closely linked to the Bank's funding strategy, risk appetite, and growth profile.

The framework for managing the risk arising from excessive leverage is built on the following key principles:

- protection of financial stability: Banca Transilvania controls leverage risk to limit the potential impact of adverse events on capital and earnings;
- limiting excessive risk-taking: the Bank's risk appetite must remain consistent with its financial resources;
- ensuring a solid and sustainable capital and funding base;
- healthy and balanced asset financing: a financing structure is maintained that takes into account the risk of excessive leverage;
- portfolio diversification to avoid dangerous concentration risks.

Strategic risk

The Strategic risk is the current or future risk for profits and capital to be negatively affected by changes in the business environment, by unfavorable business decisions, improper implementation of decisions or the low adaptability to changes in the business environment. The strategic risk appetite has been established as low based on the following aspects: risk management practices are part of the Group's strategic planning, the exposure to strategic risk reflects strategic goals that are not excessively "aggressive" and are compatible with the developed business strategies, the business initiatives are well designed and supported by communication channels, operating systems and adequate delivery networks for services.

The fundamental principles and strategic objectives in managing strategic risk are:

- ensuring consistent alignment between the business strategy, the Bank's risk appetite, and its operational capacity, so that strategic objectives remain sustainable and compatible with the assumed risk profile;
- continuously monitoring and assessing macroeconomic, political, technological, and regulatory developments in order to anticipate their impact on the Bank's strategic directions;
- conducting periodic analyses of the risks associated with strategic initiatives;
- ensuring the active involvement of senior management in the assessment and approval of strategic decisions, supported by internal control functions and the relevant risk committees;
- using a dedicated set of metrics to monitor deviations from strategic objectives, assess implementation effectiveness, and measure the institution's organizational adaptability.

In order to ensure sound strategic risk management, the BT Group conducts regular reassessments of its business strategy and of the impact of strategic decisions, draws up plans for the introduction of new business lines, products and services, for the expansion of existing services and for infrastructure consolidation. The Group also performs analysis of the business environment in which it operates in order to identify and highlight the strategic risk factors to which it is exposed, aligning business decisions with institutional capacity, market conditions, and the applicable regulatory framework.

Capital risk

Capital risk represents the significant risk associated with the credit institution's ability to maintain an adequate level of own funds, ensuring coverage of all risks to which the Bank is exposed through its activities, with a potentially material impact on its financial soundness and its ability to comply with prudential requirements.

Risks to capital are distinct risks which, if materialized, may have a significant prudential impact on the credit institution's own funds over the following 12 months. Capital risk is addressed from the perspective of the minimum capital requirements necessary to cover all risks to which the Bank is or may be exposed.

The Bank's objective regarding capital risk management is to maintain alignment between the strategic targets set through the Business Strategy and the assumed risk appetite, while ensuring financial stability, safeguarding the Bank's reputation, and complying with the applicable regulatory framework.

The capital risk management process, namely the internal capital adequacy assessment process, forms an integral part of the Bank's governance framework and decision-making culture, being embedded in the overall risk management practices, as capital risk is managed through:

- the group-level strategic planning process;
- ensuring the continuous effectiveness of the risk appetite framework;
- the risk management process and capital management, including forward-looking funding strategies;
- the group's recovery plan, by incorporating management actions with material impact;
- monitoring capital adequacy indicators to timely identify and assess potential threats;
- drawing practical conclusions and undertaking preventive actions.

Capital planning is an essential process for ensuring the resources required for the efficient execution of the Bank's operational and investment activities. It is closely linked to shareholder interests and to maintaining an adequate level of own funds in line with European, national, and internal capital requirements to cover the risks associated with the Bank's activities. Additionally, in order to ensure an optimal stock of own funds and liabilities capable of absorbing potential losses and covering recapitalization needs—namely to meet the MREL requirement imposed by the NBR as the Resolution Authority—the Bank has adjusted its capital and funding planning process by integrating specific actions aimed at accumulating additional capital instruments and eligible liabilities. The means of securing these resources are determined by the competent governing bodies, depending on the most favorable context for the Bank and its shareholders at the time of decision.

Capital adequacy

Capital adequacy within Banca Transilvania is ensured through the Internal Capital Adequacy Assessment Process, a structured and integrated framework that forms part of the institution's governance mechanism and decision-making culture. The main objectives of this process are:

- ensuring the capital necessary for conducting activities prudently;
- maintaining own funds at a level at least equal to the capital requirements set by European and national regulations, as well as internal rules, for covering the risks undertaken.

The Internal Capital Adequacy Assessment Process provides an integrated approach to identifying, measuring, aggregating, and monitoring significant risks, as well as determining the internal capital required in relation to the Bank's risk profile. It is embedded in strategic planning, capital management, the assessment of the effectiveness of the risk appetite framework, and the continuous monitoring of capital adequacy indicators, contributing to the early identification of potential vulnerabilities and the timely adoption of appropriate measures.

A key component of this framework, stress testing evaluates capital resilience under adverse scenarios. The results are analyzed in connection with the thresholds established within the Risk Appetite Framework and contribute to strengthening prudent and proactive risk management.

For determining minimum capital requirements, Banca Transilvania and the BT Financial Group use the standardized methods prescribed by regulations:

- credit risk and counterparty credit risk: the method used for calculating risk-weighted assets is the Standardized Approach;
- credit Valuation Adjustment (CVA) risk: the Bank applies to the Basic Approach.
- market risk: for determining the capital requirement related to foreign exchange risk and the trading book, the Standardized Approach is used;
- operational risk: for calculating the capital requirement for operational risk, the Bank applies the Business Indicator Component (BIC) methodology.

Through the Internal Capital Adequacy Assessment Process, the Bank ensures that it permanently maintains sufficient capital resources to cover the risks undertaken and to support sustainable development, maintaining a solid financial position consistent with the Group's strategic objectives.

BT Financial Group dynamically manages its capital base by monitoring capital rates according to Regulation no. 575/2013, as well as the capital rates disposed following the monitoring and assessment process carried out by the supervisory authority, anticipating the appropriate changes necessary to achieve its objectives, as well as optimizing the structure of assets and equity.

Planning and monitoring take into consideration the total own funds (tier 1, additional tier 1 and tier 2) on the one hand and own funds requirements, respectively risk-weighted exposures (RWA) on the other hand.

In order to ensure that it permanently maintains an adequate level of capital relative to its risk profile and macroeconomic conditions, BT develops a proactive capital planning and adequacy framework, built on four main pillars:

- compliance with the rules and regulations imposed by national and international authorities in the field;
- robust internal governance for capital planning and adequacy;
- use of stress-testing results in determining capital needs; and
- continuous enhancement of the capital planning and adequacy process.

Compliance risk

The BT Financial Group's objective regarding compliance risk management is to avoid the current or future risk of affecting profits and capital, which may lead to fines, damages and / or termination of contracts or which may damage the Group's reputation as a result of violations or non-

compliance with the legal and regulatory framework, agreements, best practices, or applicable ethical standards.

The BT Financial Group establishes and operates a formal, continuous, and effective compliance framework designed to ensure full adherence to applicable legal requirements, prudential regulations, and ethical standards, built upon the following key principles:

- ensuring full compliance with the internal regulatory framework, applicable legal requirements, and the measures, recommendations, and expectations set by the supervisory authority;
- implementing and maintaining a robust compliance program, based on clear policies and procedures, covering both general compliance and high-risk areas;
- conducting continuous, proactive, and risk-oriented monitoring of processes, transactions, and client relationships to enable early identification of compliance incidents and prompt reporting to the relevant management structures;
- developing and maintaining a training and awareness framework tailored to staff responsibilities and activities, ensuring consistent application of compliance requirements;
- promoting and strengthening an organizational culture grounded in integrity, ethics, and transparency, including the adequate and well-documented management of conflicts of interest.

Continuous monitoring and adherence to the following principles ensure the prerequisites for the correct compliance risk management:

- development and application of compliance risk assessment methodologies through the use of risk indicators;
- monitoring compliance and communicating results according to the BT reporting lines;
- analysis of those situations with potential conflict of interest at the Bank and subsidiaries level;
- periodic review of the indicators' limit, motivated by the occurrence of new risk events that were not taken into account in the initial assessment;
- formulating proposals of measures leading to the mitigation / elimination of risk events that generated the increase of the indicators level;
- the determination of the likelihood that compliance risk events may occur in the future, based on current information.

Internal and external audit

The general objectives of the 2025 audit focused mainly on risk management, as well as on the assessment of the overall control system implemented on transactions and / or processes / flows, covering the entire range of risks. The control system assessment was carried out in line with the internal audit methodology, one of the main objectives being that of ensuring the reliability and integrity of financial and operational data, as a result of an independent and objective evaluation of the internal control system and of the risk management systems in connection with the financial reporting process.

The internal control framework of the BT Financial Group is structured on three levels:

- functions that hold and manage risks (operational units);

- the functions responsible for risk oversight and for creating and maintaining the internal control framework and the independent evaluation of risks (the risk management function and the compliance function)
- the function provides an independent and objective assessment of the effectiveness and efficiency of risk management, internal controls, and the governance process, namely the internal audit function.

Thus, the 1st control level is realized by the operational units, which are responsible for ensuring an appropriate risk control and prevention environment within each operational structure/activity, as part of their daily operations; the 2nd and 3rd control levels are associated with the three independent control functions, as follows:

- the risk management function ensures the management and control of identified risks by means of specific assessment processes;
- the compliance function ensures the management of compliance risk and the oversight of compliance with the applicable regulations;
- the internal audit function ensures the objective examination of BT's overall activities, for the purpose of an independent assessment of risk management, of the internal control system, of the management and execution processes, in order to support the achievement of the objectives; it also issues recommendations for the improvement of such activities.

The external auditor, appointed by the General Meeting of Shareholders, independently examines the Bank's financial statements to assess whether they are, in essence, accurate, complete, and provide a true and fair view of the institution's financial position and performance. The auditor also verifies compliance with the applicable legal framework and standards governing the financial reporting process. The external auditor of the Bank - Deloitte Audit S.R.L. - has audited the individual and consolidated financial statements of the Bank as of December 31, 2025.

ESG Risks (Environmental, Social and Governance)

Within the context of intensifying global sustainability concerns, 2025 marks a significant milestone in strengthening the European legislative framework dedicated to ESG risks, with multiple initiatives supplementing the Omnibus legislative packages related to Sustainability & ESG Reporting. The European supervisory authorities and relevant international organizations have launched a series of initiatives aimed at supporting the green transition, reducing systemic risks, and improving consumer protection. Of these, some of the most representative refers to the integration of the ESG risks into the risk management and governance framework, aiming not only at the resilience of the banking sector, but also aligning it with climate neutrality objectives, the banks being encouraged to consider both the impact resulting from their own activities, and that generated by the financed activities. EBA/ GL/2025/01 Guidelines on the ESG risk management provides methodological recommendations on the integration of ESG risks into the credit institutions' risk management framework, also highlighting the necessity to develop prudential transition plans to support efforts towards the transition to Net-Zero. Additionally, specific guidelines for developing crisis scenarios come to complete the necessary actions, calibrating the institution's approaches, with the business specificity and risk appetite.

Regarding the strategic objectives on ESG risks, the Bank applies an integrated framework for their supervision, assessment and mitigation, in line with the international regulations and best practices. Without the enumeration being exhaustive, it implies:

- continuously updating the ESG risk management framework, based on the recommendations of the competent authorities, international relevant organizations and best practices, including initiatives such as conducting GAP analyses to optimize processes, promoting financial education, diversity, inclusion, and improving transparency and risk management mechanisms, while strengthening the principles of business ethics and corporate governance;
- monitoring the ESG risk profile through indicators, operational limits, and recurrent reports to the management structures, with escalation principles defined by specific governance;
- assessing the impact of ESG risks on capital and liquidity;
- promoting financial inclusion and impact financing, through green, social, or sustainable products;
- integrating the IFC/ EBRD standards into ESG analysis, including compliance with the requirements of the relevant authorities and the use of the exclusion lists;
- applying the ESG risk analysis in the lending activity, by utilizing a Heat-Map application;
- monitoring the carbon emissions and tracking the reduction of the carbon footprint, both resulting from the Bank's own operations and from the financed activities;
- adopting specific sectoral policies pursuing, where appropriate, a phased exit strategy.

Within the process of aligning with the climate neutrality objectives, the Bank assesses at least annually the ESG factors, their materiality related to the Bank's objectives and specific strategies (e.g. business strategy, risk strategy, sustainability strategy, sectoral strategies, etc.), reassessing the risk appetite. Additionally, based on a differentiated system of indicators (depending on the importance/ relevance/ granularity, etc.) it constantly monitors the evolution of the portfolio and adjusts the strategies, correlated with the assumed transition plan.

1.9. Aspects related to the perspectives of the Bank's activity

In July 2025, Banca Transilvania listed its first RON sustainable bond issue on the Bucharest Stock Exchange, worth RON 1.5 billion. The issuance consisted of senior non-preferential bonds with a maturity of 7 years, a 6-year redemption option and a coupon of 8.875%. The bonds are eligible as MREL instruments, contributing to the bank's loss-absorbing capacity in line with European regulatory standards. The funds obtained will be used to finance sustainable projects, in accordance with the BT Framework for Sustainable Finance.

This RON-denominated issue has further diversified investment opportunities for local investors. Together with the capitalization of a significant part of the previous year's profits, the funds raised support the continued granting of loans to both corporate and retail customers, with a direct positive impact on economic growth.

In November 2025, Banca Transilvania announced the successful execution of its first AT1 (Additional Tier 1) bond issue on the Dublin Stock Exchange, strengthening its reputation as a leading and attractive participant in international capital markets. The issuance included additional Tier 1 securities denominated in euro, contributing to the achievement of Banca Transilvania's capital objectives, in accordance with the approved capital planning.

Overall, Banca Transilvania's bond issuance programs have strengthened the bank's financing diversification, capital resilience and access to international capital markets. Through disciplinary enforcement, strong investor engagement, and integration of sustainability considerations, these

programs supported regulatory compliance, long-term financial stability, and sustainable growth. By consistently aligning financing activities with its strategic objectives and market best practices, Banca Transilvania has strengthened its capacity to support the Romanian economy, while maintaining a robust and future-oriented capital structure.

Banca Transilvania concluded on December 22, 2023, a non-STS synthetic securitization transaction with the European Investment Fund (EIF) and the European Investment Bank (EIB), effective from March 31, 2024. The synthetic securitization transaction is structured on a portfolio of loans granted to legal entities, initial securitization in amount of RON 2,027.5 million.

During the transaction, the Bank retains at least 5% of the exposure of each loan included in the securitization portfolio.

The credit risk of the mezzanine and senior tranches is transferred to the EIF, while the credit risk of the junior tranche, representing 1.6% from initial portfolio, is assumed by the Bank.

EIF - as Guarantor, issued an irrevocable and unconditional Financial Guarantee in favor of Banca Transilvania (the Beneficiary) to guarantee the coverage of the loss related to each reference obligation, should such loss be allocated to the mezzanine and senior tranche, initial total amount of RON 1,995.1 million which represents 98.4% of securitized portfolio, after exceeding the losses retained by the Bank related to junior tranche and synthetic excess spread (cumulatively 2.8% of the total volume of the initial portfolio).

The financial guarantee is treated separately and does not result in any changes to the financial characteristics of the loan, representing a distinct mechanism for covering credit risk. As a result, it does not impact the calculation of expected credit losses.

The scheduled maturity date of the guarantee is December 31, 2039.

The EIF guarantee is counter-guaranteed by the EIB through a back-to-back hedge arrangement.

The Bank's objective is to support the real economy by transferring the benefits of more efficient use of the Bank's capital to the end-customer, in the form of a lower cost of loan. To this end, Banca Transilvania has concluded with the EIB a Mezzanine and a Senior Retrocession Agreement and Commitment Agreement for increased support for SMEs and Midcaps, to supply new lending of more than RON 2.64 billion, including also projects aligned with climate action and environmental sustainability, thus supporting the transition to a low-carbon economy.

The below stated amounts represent the securitized portfolio as of December 31, 2025:

RON million

	Date of contract	End of maturity	Portfolio type	Maximum amount of securitized portfolio	Securitized portfolio (Nb. Loans)	Outstanding amount
EIF synthetic securitization	2023	2039	SME & CO	2,027.5	15,956	2,010.16
Senior tranche				1,670.67		1,656.14
Mezzanine tranche				324.40		321.58
Junior tranche				32.44		32.44

At the end of the financial year, the losses were fully allocated to the excess synthetic spread. According to the contract, the Bank will be able to benefit from reimbursements in the future for the losses associated with the defaulted reference obligations, but this benefit will only become realizable after the complete allocation of the losses to the excess synthetic spread and junior

tranche. In accordance with the definition of a contingent asset, the bank considers that, although there is a possibility that an economic resource may be received in the future under the terms of the financial guarantee contract and the losses to be reimbursed, the realization of this asset remains uncertain. It depends on the allocation of losses to the excess synthetic spread and junior tranche.

The Bank has not recognized this asset in the financial statements as of December 31, 2025, given the uncertainty regarding the timing and conditions under which the reimbursement will take place. The asset will be recognized only when there is virtually certain that the reimbursement will be made.

For 2026, the Bank aims to set the following qualitative and quantitative objectives:

Qualitative objectives:

- Reinforcing our leadership as the largest fully integrated financial group in Romania by sustained organic growth and by remaining open to acquisitions or mergers that can further accelerate our expansion;
- Consolidating our top position across all business segments and financial services sectors, while deepening synergies across BT Group companies to unlock an improved, seamless client experience;
- Supporting Romania's economic development by prioritizing lending in nationally strategic sectors – such as energy, infrastructure, healthcare, agriculture, education – while continuing to finance businesses of all sizes. BT will remain a trusted partner for national and European programs, sustaining companies and projects that accelerate the absorption of EU funds;
- Strengthening our position as the bank with top customer satisfaction in Romania by consistently enhancing service quality and continuously improving customer experience across all channels;
- Continue our ESG initiatives to contribute to a sustainable development of the Romanian economy;
- Digital: continue to enhance operational efficiency across the BT Group by advancing automation and streamlining processes, supported by sustained investments in technology and IT infrastructure. Our focus remains on delivering secure, resilient and reliable digital platforms, while ensuring rapid adaptation to the evolving needs of customers in all markets we serve.

Quantitative objectives:

- Total assets: +6.4% growth
- Total gross loans: +8.5% growth
- Total deposits from customers: +5.8% growth
- Cost/Income ratio: 45.6%
- Loans/deposits: 64.8%

The development plan for 2026 is presented in the table below:

Investment budget for 2026 (RON million):	
Buildings – agencies and branches	105.94
Investments in IT and cards, of which:	663.17
Hardware IT	34.23

Software IT	407.82
Retail and cards, of which:	221.11
<i>Hardware, retail cards</i>	51.92
<i>Software, retail cards</i>	169.19
Vehicles	21.39
Security	9.79
Cash processing center	7.88
Digital initiatives	177.22
Other	32.00
Total Investments VAT included	1,017.40

In projecting indicators for 2025, an average inflation rate of 6.1% has been considered and an EUR-RON exchange rate of 5.17.

The Bank estimates a growth rate of 6.4% for total assets as compared with previous period (up to RON 223,765 million). The structure of assets is projected to comprise a weight of 51.7% of gross loans, a weight of 23.5% of cash and cash equivalents and a weight of 25.2% of investments in treasury bills.

Regarding the structure of liabilities and equity forecasted for 2026, the Bank considered a growth rate of resources from non-banking clients of 5.8% as compared with 2025, meaning a weight in total liabilities of 89.0%.

The 2026 budgeted ratios subject to the GMS approval are determined so as to support the business objectives and are correlated with the specific prudential and supervisory standards.

2. The Bank's Tangible Assets

2.1. Location and properties of the main production capacities owned by the Bank

Until now, the Bank currently owns tangible assets in the form of buildings, which represent the offices of its subsidiaries/agencies located in: Bistrița, Brasov, București Obor, Cluj-Napoca, Centrul Regional București, Centrul de Procesare Cash București, Centrul de Procesare Cash Cluj, Dej, Deva, Drobeta Turnu-Severin, Miercurea-Ciuc, Râmnicu-Vâlcea, Turda, Zalău, Suceava, Iași, Alba-Iulia, Arad, Alexandria, București Unirii, Bacau, Botosani, Baraolt, Cristuru Secuiesc, Odorheiu Secuiesc, Ploiesti, Sfântu Gherorghe, Târgu Secuiesc, as well as six buildings accommodating the Bank's Headquarters. The other locations where BT units are currently operating are rented offices.

2.2. Description and analysis of the degree of wear and tear of the Bank's properties

The net tangible assets as of 31 December 2025 amount to RON 1,227.88 million, of which 48% are buildings and land. The majority of real estate properties were recently built or refurbished.

A detailed analysis of the Bank's fixed assets is presented in the Notes to the Financial Statements.

Tangible assets do not include rights-of-use assets recorded in accordance with IFRS 16.

2.3. Notes on the potential issues related to the ownership of the Bank's tangible assets

Not applicable.

3. The stock exchange where the securities issued by the company are traded

3.1. Romanian and foreign markets where the securities issued by the Bank are traded

As of 15.10.1997 (the first trading day), Banca Transilvania became the first Romanian banking institution listed on the Bucharest Stock Exchange. The Bank's shares are indivisible common dematerialized nominal shares.

At the beginning of 2025, the share capital registered with the Trade Register was RON 9,168,798,460.

As a result of the Decisions of the Extraordinary General Meeting of Transilvania Bank Shareholders of April 25, 2025, it was decided to increase the share capital by the amount of RON 1,734,423,790 by issuing a number of 173,442,379 new shares, with a nominal value of 10 RON/share. The increase of the share capital was achieved by incorporating the reserves constituted from the net profit of the year 2024 in the amount of RON 1,734,423,790, by issuing a number of 173,442,379 shares with a nominal value of 10 RON/share, for the benefit of the shareholders registered in the Shareholders' Register held by the Central Depository on the registration date established by the General Shareholders' Meeting (July 18, 2025). The increased value of the share capital is RON 10,903,222,250, divided into 1,090,322,225 shares, each having a nominal value of RON 10. The registration operations of the share capital increase at the Central Depository were completed on 21.07.2025, and the issuance of the Certificate of Registration of Financial Instruments no. AC – 5606 – 4 by the ASF took place on 30.07.2025.

The share capital structure as at 31.12.2025 and 31.12.2024 was as follows:

Shareholders	31-Dec-25	31-Dec-24
NN Group (*)	9.37%	9.37%
European Bank for Reconstruction and Development (EBRD)	5.16%	5.16%
Romanian individuals	25.15%	24.21%
Romanian companies	45.56%	45.20%
Foreign individuals	1.17%	1.11%
Foreign companies	13.59%	14.95%
Total	100%	100%

(*) NN Group N.V. and pension funds managed by NN Pensii SAFAP S.A. and NN Life Insurance S.A.

The Bank's market capitalization at the adjusted price, excluding cash dividends, on 31 December 2025 was RON 32.93 billion, respectively EUR 6.46 billion (31 December 2024: RON 24.76 billion, respectively EUR 4.97 billion).

3.2. The Bank's policy regarding dividends

In 2025, the Bank distributed dividends in the amount of RON 1,589,254,950 from the 2024 profit, the gross value of the dividend per share being RON 1.7333295709, and from the reserves of other years, dividends in the amount of RON 700,000,000, the gross value of the dividend per share being RON 0.6420341921.

In 2024, the Bank distributed dividends in the amount of RON 1,000,000,000 from the profit of 2023, the gross value of the dividend per share being RON 1.2521000331.

In 2023, the Bank distributed the profit of 2022 (RON 897,540,893) as well as part of the reserves of the previous years (RON 4,914,768.77 from the net profit reserves of the previous years) as cash dividends in a total amount of RON 902,455,661.77, the gross value of the dividend per share being RON 1.13.

Proposals regarding the distribution of profit for the financial year 2025

The Board of Directors of the bank submits for approval to the GMS the proposal for the distribution of the profit in the amount of RON 4,819,442,833, according to the following situation:

Proposal for 2025 profit distribution	Amounts (RON)
Net profit 2025	4,095,289,537
5% Legal reserve fund from gross profit	(241,182,537)
Net profit to be distributed	3,854,107,311

The Board of Directors proposes for approval to increase the Bank's share capital from RON 10,903,222,250 to RON 12,475,866,499, with the amount of RON 1,572,649,249, representing reserves from the 2025 net profit. The increase in the share capital will be carried out by issuing a number of 157,264,424 shares, with a nominal value of RON 10/share in the benefit of the shareholders registered with the Shareholding Register held by the Central Depository at the registration date that will be established by the GSM, following that the price for the compensation of the fractions of shares resulting from the application of the algorithm and the rounding of the results, to be determined in accordance with the legal provisions in force. The Board of Directors proposes for approval the distribution of profits by granting dividends amounting to RON 1,400,000,000 and the amount of RON 881,463,063 is distributed in the retained result. The gross dividend per share amounts to RON 1.2840240875.

Following the implementation of the resolution adopted by the General Meeting of Shareholders regarding the allocation of the net profit for the 2025 financial year, the capital ratios as at 31 December 2025 will become: Common Equity Tier 1 ratio of 18.62%, Tier 1 capital ratio of 21.55%, and Total Capital Ratio (solvency ratio) of 23.56%.

Proposal for 2025 profit distribution	Amounts (RON)
Total available reserves for distribution	3,854,107,311
Retained earnings	700,000,000
Dividends	1,400,000,000
AT1 instruments' distribution	181,463,063
Capitalization of 2025 net profit reserves	1,572,644,249
Share capital at recording date*	10,903,222,250

Proposal for 2025 profit distribution	Amounts (RON)
Yield per share % capitalization	0.14423664975

*The share capital registered with the Trade Register amounts to 1,090,322.225 shares with a nominal value of 10 RON/ share

The distribution related to the AT1 instruments will be recorded as a payment obligation in EUR currency on the date of approval of their distribution by the General Shareholders' Meeting and the payment will be made in two installments, the first on 27.05.2026 and the second on 27.11.2026, subject to the fulfilment, on relevant dates, of the conditions for distribution of AT1 type instruments.

The cumulative value of distributions related to AT1 instruments, established according to the issue prospectus, is EUR 35,625,000. The equivalent in RON of 181,463,063 was calculated at the exchange rate of EUR 1 = RON 5.0937 as of 11.03.2026. Their final value will be lower or higher depending on the evolution of the EUR - RON exchange rate until the date of registration of the payment obligation in EUR.

3.3. The Bank's share buyback activities

The share buybacks that took place in 2025 are part of the program approved by the Resolutions of the Ordinary and Extraordinary General Meeting of Shareholders of Banca Transilvania S.A. of 25.04.2025, when the Bank's buyback of its own shares was approved, in accordance with the applicable legal provisions, under the following conditions: up to 5,000,000 shares (0.55% of the total shares that make up the share capital) with a nominal value of RON 10/share at a minimum price equal to the market price on the BVB at the time of the acquisition and a maximum price of RON 38, for a maximum period of 18 months from the date of publication of the EGMS Decision in the Official Gazette of Romania, Part IV, within a stock option plan program in order to implement a remuneration system and carry out a staff loyalty program for a period of at least 4 years.

3.4. The number and nominal value of the shares issued by the parent company and owned by the subsidiaries

As at 31.12.2025, BT Group has in balance the amount of RON 26.5 million own shares at acquisition value (~3.3 million shares), which are held by BT INVEST1, a Group subsidiary.

BT group subsidiary	Number of shares held	Nominal value at 31.12.2025	Percentage held of the Bank's share capital as at 31.12.2025
BT INVEST1	3,283,642	32,836,420	0.30%
Total BT Invest1 shares held	3,283,642	32,836,420	0.30%

3.5. Bonds issued by the Bank

The category of "Subordinated debts" includes, at Bank level, the bonds not convertible into shares issued by BT both in 2018 and in 2023, which will be detailed below. Their balance as of 31.12.2025, at the Bank level, is RON 2,466 million.

In 2018, Banca Transilvania S.A. issued 2,850 bonds, with the nominal value of a bond of 100,000 euros. The bonds were offered for subscription through private placements to a limited number of eligible investors. Private placement of Tier 2 Equity Bonds, unsecured, subordinated,

denominated in euro, bearing an interest equal to Euribor 6M + 3.75% per annum, maturing in 2028, with a total nominal value of EUR 285 million (equivalent to RON 1,453 million as of December 31, 2025). The bonds became tradable on the regulated spot market administered by the Bucharest Stock Exchange under the ISIN code ROTLVADBCo23 and the symbol TLV28E starting with July 6, 2018.

On June 30, 2025, the payment was made to bondholders of the 14th coupon for the 14th interest period (December 28, 2024 – June 27, 2025) in the amount of EUR 3,208.76/nominal value.

On December 29, 2025, the payment of the 15th coupon for the 15th interest period (June 28, 2025 – December 28, 2025) in the amount of EUR 2,941.73/ nominal value was made.

As of 31.12.2020, the balance of convertible bonds was 0 (zero) lei, as a result of the fact that in 2019, the Bank converted a number of 8,920 bonds in a total amount of 2,122 euros, equivalent to 9,829 lei, an amount that was used to increase the share capital, in 2020 the Bank converted bonds in a total amount of 83 thousand euros, equivalent to 391 thousand lei, an amount that was used as follows: 173 thousand lei for the increase of the share capital and 218 thousand lei for the constitution of the capital premiums and also in 2020, the balance of convertible bonds in the amount of 9,814 thousand euros, equivalent to RON 47,523 thousand was repaid on 22.05.2020.

During 2021 and 2022, the Bank did not issue bonds.

Banca Transilvania S.A. issued in 2023 non-convertible bonds in the amount of EUR 200 million, equivalent to RON 1,020 million (RON 995 million in 2024), at Euribor 6m +6.68% per annum, maturing in 2033. The face value of a bond is EUR 100,000.

On June 30, 2025, the payment was made to bondholders of the fourth coupon for the fourth interest period (December 29, 2024 – June 28, 2025) in the amount of EUR 4,625.79/nominal value.

On December 29, 2025, the fifth coupon was paid for the fifth interest period (June 29, 2025 – December 28, 2025) in the amount of EUR 4,358.50/ nominal value.

The Bank also issued MREL bonds recorded on the balance sheet in the category "Loans from banks and other financial institutions", with a balance of RON 14,604 million, of which the balance as of 31.12.2025 of the bond issues detailed below is RON 11,969 million:

In 2023, within the *EUR 1,000,000,000 Euro Medium Term Note Program*, Banca Transilvania issued bonds totaling EUR 790 million, with ISIN XS2616733981, annual interest rate 8.875% and maturity 27.04.2027. The coupon payment frequency is annual, 27.04.2025 being the date of the second payment.

The first tranche of the *EUR 1,500,000,000 Medium Term Note Program (EMTN 2023)* was issued on 29 November 2023 for EUR 500 million with ISIN XS2724401588, a rate of 7.25% per annum and maturity 07.12.2028. This bond issue is the first with an ESG label for Banca Transilvania, with a social component (minimum 50%) and a green one. The coupon payment frequency is annual, 07.12.2025 being the date of the second payment.

The second tranche of *EMTN 2023* was issued on September 25, 2024, for a value of EUR 700 million with ISIN XS2908597433, a rate of 5.125% per annum and maturity 30.09.2030. It is the second consecutive time that BT has launched a bond issue under the umbrella of the Sustainable Finance Framework. The coupon payment frequency is annual, 30.09.2025 being the date of the first payment.

In July 2025, Banca Transilvania listed on the Bucharest Stock Exchange its first issue of sustainable bonds in lei, worth RON 1.5 billion, with ISIN XS3109437387. The issuance consisted of senior non-preferential bonds with a maturity of 7 years, a repurchase option after 6 years and a coupon of 8.875% and maturity on July 3, 2032. Bonds are eligible as MREL instruments. The payment frequency of the coupon is annual.

In November 2025, Banca Transilvania successfully completed its first AT1 (Additional Tier 1) bond issue listed on the Dublin Stock Exchange, with a total value of EUR 500 million. The issuance included additional Tier 1 securities denominated in EUR, contributing to the achievement of Banca Transilvania's capital objectives, in accordance with the approved capital planning. The bonds have a coupon of 7.125%, reset every five years, with the first reset date on May 27, 2031, and were issued on November 27, 2025, with ISIN XS3239211132.

4. Bank Management

Corporate Governance represents an essential role in strengthening Banca Transilvania's performance. By establishing a clear direction, it contributes to achieving the company's objectives, adequate risk management, and responsible resource allocation.

As an issuer on the capital market, Banca Transilvania is committed to complying with the Bucharest Stock Exchange Corporate Governance Code, applying the principles and requirements set forth therein. Both previous version of the Code and the updated edition, which came into force on January 1st, 2025, can be consulted on the BSE's website. The first year of reporting compliance with the new Corporate Governance Code of the Bucharest Stock Exchange is 2026, for the 2025 financial year. In this regard, Banca Transilvania makes every effort to continuously verify that its shareholders comply with the legal and regulatory requirements regarding their financial integrity and solidity, as well as those relating to the influence they may exert on the management of the bank, no aspects being identified that may contravene these requirements.

The General Meeting of Shareholders (GMS)

The General Meeting of Shareholders (GMS) is the supreme decision-making body of Banca Transilvania that ensures the strategic management of the Bank, with the responsibility of setting strategic organizational objectives and allocating of the resources necessary to achieve them.

The decisions of the General Meeting of Shareholders adopted in accordance with the applicable law and the provisions of the Bank's Articles of Association are mandatory for all the shareholders, including for the ones that have not taken part in the Meetings.

The Board of Directors

The management structure of Banca Transilvania includes the supervisory body, the Board of Directors and the top management, the Leaders' Committee.

The top management of the Bank is provided by individuals appointed to exercise the operational management of the credit institution, who are accountable to the management body for the performance of their duties. Their mandates are exercised in accordance with the provisions of the management contracts, the applicable regulations of the National Bank of Romania, the provisions of Law No. 31/1990 on Companies, as well as the bank's internal regulatory framework.

The management of Banca Transilvania is exercised by a Board of Directors appointed by the General Meeting of Shareholders for four (4) years. The Board consists of seven (7) directors, elected by the shareholders at the General Meeting of Shareholders, either upon expiry of their term of office or on an exceptional basis, in the event of one or more vacancies. In accordance with the specific regulations issued by the NBR, the Board of Directors is the body responsible for strategic guidance, coordination, supervision, and control of the bank's activities, with the responsibility of ensuring prudent, efficient, and compliant management within the applicable regulatory framework.

Within Banca Transilvania, the Board of Directors has the following structure:

- Chairman of the Board of Directors;
- Vice-Chairman of the Board of Directors;
- five (5) directors - members of the Board of Directors;

The eligibility criteria for the appointment of the Board of Directors are those set out in the applicable specific legislation, namely Law no. 31/1990 on Companies, Government Emergency Ordinance no. 99/2006 on credit institutions and the relevant regulations of the NBR, as well as those set out in the Articles of Association of Banca Transilvania.

After the approval of the nomination by the shareholders at the GSM, but before the actual takeover of the mandate, each new member of the Board of Directors must obtain prior approval from the National Bank of Romania, in accordance with the "fit & proper" assessment requirements applicable to credit institutions.

The members of the Board of Directors are not involved in the Bank's operational activities, as these responsibilities fall exclusively to the Leaders' Committee. The role of the Board is one of supervision and strategic guidance, in accordance with corporate governance standards and NBR regulations.

Responsibilities of the Board of Directors:

- To monitor the implementation of the strategy and the objectives set out in the policy statement adopted by the General Meeting of Shareholders, as well as of the medium-term Strategic Plan, to approve and review the general strategies and policies relating to the bank's activity at least once a year;
- To adopt the Activity Plan and the Revenue and Expenditure Budget, the Investment Program and the Profit and Loss Account, as well as to prepare the Report regarding the bank's activity, which are all submitted for approval to the General Meeting of Shareholders and to prepare the proposals for the distribution of the net profit, submitted for approval to the General Meeting of Shareholders;
- To approve and implement a Strategic Plan for a minimum period of two (2) years which is to be reviewed at least annually;
- To approve the Rules of Organization and Administration, the Code of Ethics and Conduct, the organizational structure, as well as the principles for staff remuneration and retention, and to approve sound strategies and policies for establishing new structures and individual exposures towards persons in special relations with the bank;
- To supervise the management of the compliance risk;
- To create the necessary conditions for an independent, permanent and efficient compliance function;

- To approve the annual Compliance Program of the Bank and its subsidiaries, as well as the selection and suitability assessment processes for persons holding key positions;
- To oversee the reporting and communication processes with the National Bank of Romania;
- Ongoing assessment of the capital adequacy in relation to risks, ensuring the capital allocations are in line with the risks assumed both for the credit institution and for its subsidiaries;
- To approve the recording of losses and major expenses for fixed assets and leasing, within the limits of the powers established by the Bank's internal regulations;
- To approve the contingency, business continuity, and recovery plans, in accordance with the applicable regulations;
- To approve the accounting policies, the financial control system policies, as well as the significant risk management policies;
- To approve other significant exposures and operations of the Bank, including exposures to affiliated parties and shareholders with significant holdings, setting credit-related limits, initiating enforcement proceedings, approving loans and borrowings granted above the established limits, approving operational budgets, major or related-party transactions, debt and financing with significant impact, as well as approving remuneration policies, measures regarding participations, acquisitions, outsourcing, internal regulations and risk limits in accordance with internal regulations and the powers established by the Board of Directors;
- To approve other internal policies and rules, in accordance with the Bank's Rules of Organization and Administration.

The Board of Directors meets, as a rule, quarterly and whenever necessary, including when operational or regulatory circumstances require, the meetings being validly constituted in the presence of at least half of its members. The Board may also exercise its specific powers through specialized committees set up at its level, consisting of three–four (3-4) members and operating based on the mandates received and in accordance with the legal requirements applicable to each forum. The committees established at the level of the Board of Directors are the Audit Committee, the Remuneration Committee, the Nomination Committee, and the Risk Management Committee. These support the Board in exercising its supervisory role through specialized analysis, independent evaluation, and the drafting of recommendations in their areas of expertise. The activity of the Board of Directors and the committees established by it is governed by terms of reference and procedural rules aligned with corporate governance principles, documents published on the BT website. In 2025, the Board of Directors met in person seven (7) times. In determining the attendance rate at the meetings presented below, both physical presence and objectively justified absences were taken into account, in accordance with the Bank's practices.

4.1. List of Bank Directors

During the year 2025 there were no resignation among the members of the Board of Directors and the executive management.

The members of the Board of Directors (BoD) on 31.12.2025 are:

Name	Position	Percentage held of the share capital of the Bank as of 31.12.2025
Ciorcilă Horia	Chairman of the Board of Directors	4.661003% directly and together with shareholder BT Castorius Limited
Grasse Thomas Gunther	Vice-Chairman of the Board of Directors	0.000000%
Gueorguiev Ivo	Non-executive Member of the Board of Directors	0.129100%
Puşcaş Vasile	Non-executive Member of the Board of Directors	0.046797%
Bordea Mirela Ileana	Non-executive Member of the Board of Directors	0.015087%
Stanczak-Wuczynska Lucyna	Non-executive Member of the Board of Directors	0.006743%
Predescu Vasvari Florin	Non-executive Member of the Board of Directors	0.000000%

Note: direct holdings except where it is presented otherwise

The members of Banca Transilvania's Board of Directors and their professional training, on the 31st of December 2025, are as follows:

Ciorcilă Horia (born in 1963, Romanian nationality) graduated in 1989 from the Faculty of Automation and Computers at the Polytechnic Institute of Cluj-Napoca.

Starting with 1993, he took part as a founding member in the establishment of Banca Transilvania S.A. and several companies within the Banca Transilvania Financial Group operating in the financial and banking sector (insurance, leasing, etc.). At the same time, he also took part as a founding member in the establishment of other companies, including those that later formed the Astral Telecom Group (the leader of the cable TV and internet provider on the market in Romania), Maestro Industries, and RomVioCons - Omniconstruct. He was also a member of the Board of Directors of BT Asigurări S.A., BT Asset Management SAI S.A., Chairman of the Board of Directors of BT Aegon, and member of the Board of Directors of ACI S.A. He is currently a member of the Board of Directors of Evergent Investments S.A.

He has a track record of consistent performance, having been involved in multiple development projects within the companies he works for, as well as in significant efforts to capitalize on market opportunities in terms of transactions (such as the acquisition of the Astral Telecom Group by UPC Romania).

Mr. Ciorcilă is also involved in creating a more competitive business environment that offers continuous development opportunities, including the professional development of the people who form it. An example of this is the significant contribution he made in founding EMBA University of Hull (UK, ranked 526th worldwide), the first 100% British business school in Cluj-Napoca, a project carried out under the partnership between BT, Babeş-Bolyai University, and Electrogrou. Finally, we mention that, in 2024, he received the "Nihil Sine Deo" distinction from the Romanian Royal Family, in recognition of his promotion of Romanian values through Banca Transilvania and his support for local development projects.

He has been a member of the Board of Directors of Banca Transilvania S.A. since its establishment, and since 2002 he has been the Chairman of the Board of Directors of the Bank; NBR authorization dated June 14, 2002; he also holds the position of member of the Remuneration Committee and the Nomination Committee.

Grasse Thomas (born 1955, German national) has been an independent member and Vice-Chairman of Banca Transilvania's Board of Directors since 2014. He also holds the title of Chairman of the Risk Committee and is a member of the Audit Committee.

Before graduating from Bankakademie Frankfurt, he completed a banking apprenticeship at HYPO-Bank AG (a predecessor institution of HypoVereinsbank AG) in Munich and is a member of the Financial Experts Association e.V., a leading German association focusing on supporting independent professional Directors in corporate governance, risk management, accounting, internal control and compliance.

He has an extensive experience in commercial and investment banking while working for HypoVereinsbank (now UniCredit Bank AG) until 2009 in a number of senior management positions in Germany, Luxembourg and as CFO and COO of UniCredit Markets & Investment Banking for Poland. While at HypoVereinsbank he gained significant experience in Corporate Development and strategic M&A, both national and cross-border (growth and restructuring). He was responsible for numerous corporate transactions with a focus on Financial Institutions across the European Union and the Commonwealth as well as managing partnerships and ownership in various strategic investments.

His 15 years of supervisory experience in publicly traded commercial banks in Southeastern Europe and the CIS region, particularly in areas such as Corporate Development, Mergers & Acquisitions, Finance, Risk Management, Corporate Governance, audit and regulatory compliance issues, corporate restructuring, business transformation and joint ventures.

Since 2009 he has served as both an Independent and a non-Independent Non-Executive Director for various banks, all but one of them determined significantly important financial institution by the local regulator. His past assignments include positions in Supervisory Boards where he was nominated by the European Bank for Reconstruction and Development: Banca Intesa Russia, member of INTESA SanPaolo Group, Milan and Credit Bank of Moscow. As Independent Director he was appointed on the Board of Alliance Bank, Kazakhstan where he also chaired the Audit, Risk and Recovery Committee for five years (today: AO „FORTE Bank “), International Moscow Bank, Russian Federation, HVB Bank Ukraine and on the Advisory Board of privately owned Specta Group, a leading international Industrial Packaging company.

Currently, within GFBT, Mr. Grasse is the Chairman of Victoriabank's board, a bank listed on the Moldova's Stock Exchange, Chisinau. Within this entity he also chairs the Nomination and Corporate Governance Committee and the Remuneration Committee. Since 2017 he is Managing Partner ROMOTO GmbH (Munich, Germany). He has been a member of the Board of Directors of Banca Transilvania S.A. since April 29, 2014; NBR authorization dated December 30, 2014; he also holds the position of Chairman of the Risk Management Committee and member of the Audit Committee.

Gueorguiev Ivo (born in 1964, British citizen) graduated from the University of National and World Economy in Sofia, Bulgaria in 1990, including master's studies, and obtained an MBA degree from the University of Alberta in Edmonton, Canada in 1993. He has held various positions as: consultant to the Management Committee of Varsity Consulting Group Edmonton Canada, Principal Banker for the EBRD in the Baltics/Belarus Group, President of Hermis Finance Lithuania, Vice President of Hermis Bank Lithuania, Senior Banker for the EBRD within the Financial Institutions Group, CEO and Chairman of the Management Board of TBIF Financial Services BV, Chairman of the Supervisory Board of TBI Bank.

He has been a member of numerous Boards of Directors, including Chairman of Hermis Finance Lithuania, Vice-Chairman of Hermis Bank Lithuania, member of the Board of Directors of Baltics Small Equity Fund, Export & Credit Bank Macedonia, Bulgarian Insurance and Pension Holding, Chairman of the Board of Directors of TBI Broker Serbia, Chairman of TBI Lizing Serbia, Chairman of the Board of Directors of TBI Bulgaria, CEO and member of the Board of Directors of TBIF Bulgaria, Chairman of the Board of Directors of TBI Invest / Asset Management Bulgaria, Vice-Chairman of the Board of Directors of TBI Credit S.A. Romania, Chairman of the Board of Directors of TBI Credit EAD Bulgaria, and Chairman of the Board of Directors of TBI Leasing AD Bulgaria.

In the fintech sector, he is recognized for his involvement in the development of digital payment solutions and for his contribution to expanding financial access for large segments of users, including micro and small businesses in the EU, through innovative POS software platforms.

Mr. Gueorguiev has also been appointed to multiple Supervisory Boards as a member, vice-chairman, or chairman, such as those of Energo S.A. Poland, Pension Fund Doverie Bulgaria, Sympatia Finance Slovakia, Sovcom Bank Russia, TBI Holding Company Netherlands, Arka Consumer Finance Russia, VA Bank Ukraine, and TBI Bank Bulgaria.

He is currently a member of the Board of Directors of Paynetics (formerly Credibul AD), Bulgaria and the United Kingdom, Phyre AD, Bulgaria, Intera Financial Services ISC, Bulgaria, he is also the Chairman of the Board of Directors of Salt Bank S.A., where he additionally serves as Chairman of the Remuneration Committee and as a member of the Risk Management Committee. He has been a member of the Board of Directors of Banca Transilvania S.A. since April 29, 2014; NBR authorization dated November 27, 2014; He also holds the position of Chairman of the Audit Committee and member of the Remuneration, Nomination, and Risk Management Committees.

Puşcaş Vasile (born in 1952, Romanian nationality) graduated from the Faculty of History and Philosophy of Babeş-Bolyai University, Cluj-Napoca, with a degree in History and Social Sciences. He holds a PhD in History from Babeş-Bolyai University, Cluj-Napoca, and since 1995 he has been a professor at the Faculty of History and Philosophy, Department of Contemporary History and International Relations at the same university. From December 2000 to December 2004, he served as Minister Delegate in the Romanian Government and was chief negotiator during the process of Romania's accession to the European Union, making a significant contribution to the integration process that was completed in 2007. In December 2008, he was appointed Secretary of State of the Department for European Affairs (DAE), and in early 2009, it was decided to change his title to Head of the European Programs Department with ministerial rank. Between 2009 and 2013, he was Senior Advisor to the Department of European Programs.

Since 2012, he has also been a professor within the Department of European Studies of the University. Since 1999, he has also been the Director of the Institute of International Studies, Faculty of History and Philosophy, Babeş-Bolyai University, Cluj-Napoca. Since 2002, he has been a member of the National Commission for the Recognition of Titles and Diplomas (Ministry of Education and Research). Since 2011, he has led the Jean Monnet Course – European Negotiation and Policy module within the Department of International Studies and Contemporary History at Babeş-Bolyai University in Cluj-Napoca. He has also been a corresponding member of the Romanian Academy since 2021.

Currently, Mr. Puşcaş is also a member of the Board of Directors of Teraplast S.A., a company listed on the Bucharest Stock Exchange.

He has been a member of the Board of Directors of Banca Transilvania S.A. since November 2013; NBR authorization dated October 18, 2013; He also holds the position of Chairman of the Remuneration Committee.

Bordea Mirela Ileana born in 1955, Romanian nationality) graduated from the Commerce Faculty – Foreign Trade Department of the Bucharest Academy of Economic Studies in 1978.

Mrs. Bordea began her professional career as an economist at the SARO Târgoviște company. Between 1985 and 1991, she worked at the Ministry of Foreign Trade as a commercial representative at the Economic Agency in Brussels. Between 1992 and 1993, she was financial manager of Comex SRL. With over 30 years of experience, she has been working in the banking system since 1993, starting as manager of the credit department for Industrial and Commercial Credit Bank, where she later held the positions of Head of the Risk Management and Credit Monitoring Department and member of the Credit and Non-Performing Loans Committee (NPL). Her main responsibilities between 1993 and 2002 were around the credit area, and in the second half of 2002 she took over responsibility for coordinating the non-performing credit recovery department. Subsequently, between 2003 and 2017, she held the position of Vice President and member of the Management Committee of Finansbank (later Credit Europe Bank), in which capacity she also served as a member of the Credit, Human Resources, IT Security, and ALCO Committees. Through her significant experience, Mrs. Bordea has acquired practical and managerial skills, particularly in the areas of risk management, compliance, internal audit, and cybersecurity. At the same time, since 2014, in recognition of her professionalism and dedication to the financial and banking sector, she has been elected as a member of the Board of Directors of the Romanian Banking Association (ARB) – the most important non-profit entity responsible for promoting the health of the banking environment in Romania by aligning it with the European banking system through efficiency, competitiveness, and stability, as well as by contributing to Romania's economic prosperity.

She has been elected member of the Board of Directors of Banca Transilvania S.A. since April 26, 2017; NBR authorization dated September 21, 2017; She also holds the position of member of the Audit Committee.

Stanczak-Wuczynska Lucyna (born in 1966, Polish citizen) graduated from the Warsaw School of Economics in 1990 with a master's degree in economics, specializing in finance and statistics, econometrics, and holds advanced postgraduate studies in economics and European integration from the College of Europe, Belgium. She began her professional career as a senior officer in corporate finance at Credit Lyonnais, France. Between 1998 and 2000, she held the position of Vice President of ABN AMRO Bank – Netherlands, with responsibilities in the area of structured finance, including expertise in investment banking from the perspective of shaping client strategies for projects financed by the bank.

Her expertise is directly linked to her membership of the European Bank for Reconstruction and Development, where she managed a portfolio of over €4 billion. She specializes in investment, capital market development, privatizations and listings, energy transformations, portfolio management and value creation. Between 2000 and 2014, she held various positions at the European Bank for Reconstruction and Development. Between 2000 and 2005, as Principal Banker in the *Infrastructure Business Group* division, she coordinated multiple transactions, particularly in the areas of energy, natural resources, co-financing of European Union accession

applications, and privatizations. Subsequently, between 2005 and 2008, she served as Deputy Director of the EBRD Energy Group, then between 2008 and 2014 as National Director for the EBRD in Poland, and between 2014 and 2020 as Regional Director of the EBRD for Financial Institutions and Banks in the EU. At the same time, her professional commitments included the position of observer on the Supervisory Board of Exatel Telecom from 2007 to 2008, Vice-Chairman of the Supervisory Board of Awbud Group in Poland from 2012 to 2015, from 2013 to 2014, she was a member of the Supervisory Board and Chair of the Investment Committees of the Polish State Wealth Fund Polskie Inwestycje Rozwojowe (currently PFR). Since 2017, she has been a member of the Supervisory Board of Erste Bank Hungary. In 2021, she was appointed Chair of the Supervisory Board and member of the Risk, Audit, and Nomination/Remuneration Committees of BNP Paribas Bank Polska.

In Romania, Ms. Stanczak-Wuczynska is also a member of the Advisory Board of Concordia 21 – Private Equity Fund.

She was elected member of the Board of Directors of Banca Transilvania S.A. on April 28, 2022; NBR authorization dated on October 31, 2022; She also holds the position of member of the Risk Management Committee at BT.

Predescu Vasvari Florin (born in 1976, Romanian citizen) is an independent member of the Board of Directors of Banca Transilvania, Chair of the Nomination Committee and member of the Risk Management Committee, with extensive experience both in academia and in senior management roles. Between 1999 and 2000, he began his professional career within the U.S. Treasury and the Romanian Ministry of Finance, as part of the economic policy program.

In 2000 he graduated from the bachelor's Programme of the Faculty of Economic Cybernetics, Statistics and Informatics within the Bucharest University of Economic Studies. He obtained a master's degree in economics from the Department of Economics of the University of Toronto (Canada), and in 2006 he completed his PhD in Accounting at the Rotman School of Management of the same university.

He began his academic career in 2006 at the London Business School. Since 2006, he holds the title of Professor of Accounting, and since 2010 he has been a member of the Finance Committee. Since 2010 he has been the Academic Director of the Institute of Entrepreneurship and Private Capital and, starting with 2025, also serves as Executive Dean. Until August 2024, he was a member of the School's Management Board and Head of the Accounting Department. He has been invited to deliver lectures at numerous academic events and speaker for multiple conferences and universities, including Harvard Business School, Boston College, Tilburg University, Norwich University, among many other professional forums.

Starting with 2018, he has successively held several management positions, first as Senior Advisor and member of the Investments Committee of Morphosis Capital (Bucharest, Romania); since 2019, as Senior Advisor and member of the Risk Committee of Blantyre Capital (London, UK); since 2020, as Board Member of Validus Risk Management (London, New York, Toronto and Oslo, until 2025); since 2021, as Chairman of the Board of Directors of Alkeemia Spa, Italy, and Board Member of Sunwave Pharma Bucharest (until 2023); and since 2024, as Senior Advisor to Vybros Capital Partners, Belgium.

He was elected member of the Board of Directors of Banca Transilvania S.A. at the General Meeting of Shareholders held on 28 April 2022 and received the NBR approval on 31 October 2022. He also

holds the position of Chair of the Nomination Committee and member of the Risk Management Committee.

There is no information on any agreement, understanding or family relationship between the members of the Board of Directors and other persons to help appoint the respective persons in the position of member of the Board of Directors in 2025.

The list of affiliated persons is available in ANNEX 2 to this report.

4.2. The Bank's executive management

At the level of the executive management, there were no changes.

The Bank's management, organization and current activity coordination is assured by the Leaders Committee with the following structure:

Name	Position	Percentage held of the Bank's share capital as of December 31, 2025
Tetik Ömer	Chief Executive Officer	0.118064%
Caragea Cătălin	Deputy Chief Executive Officer, CRO	0.001091%
Toderici Leontin	Deputy Chief Executive Officer, COO	0.140074%
Dominiak Andrzej	Deputy Chief Executive Officer, CTO	0.005425%
Călinescu George	Deputy Chief Executive Officer, CFO	0.026388%
Ilaș Oana	Deputy Chief Executive Officer, Retail Banking	0.014901%
Pleşuvescu Bogdan	Deputy Chief Executive Officer, CLO	0.023625%
Moisă Tiberiu	Deputy Chief Executive Officer, SME Banking	0.066401%

This report details the holdings directly owned by the reported persons, not those subject to certain restrictions. The issuer continues to adhere to the principles of transparency and corporate governance and will continue to keep investors adequately informed of any relevant developments.

There is no information on any agreement, understanding, or family relationship between executive members and other people to help appoint the respective person to the executive board in 2025.

4.3 For all the persons included at 4.1. and 4.2. must be presented any possible litigation or administrative proceedings in which they have been presented in the last 5 years with regard to their activity within the Bank, as well as other aspects related to their capacity to perform their duties within the Bank

There are no such events to be declared.

5. Statement of financial position

The information presented in the consolidated and individual financial statements of the Group and Bank for 2025 is based on the rules for accounting organization and management, in accordance with Law no. 82/1991 republished with subsequent amendments, the Government Emergency Ordinance no. 99/2006 regarding the financial institutions and capital adequacy with subsequent amendments, NBR Order no. 27/2010 approving the accounting rules under International Financial Reporting Standards adopted by the European Union applicable to financial institutions with subsequent amendments as well as other NBR instructions in the field.

The analysis of the economic and financial situation of the Bank and of the Group, based on the financial statements, comparatively in the last 3 years, is presented below:

a) The Bank's and the Group's statement of financial position

Indicators (RONmn)	Bank			Group		
	Dec'25	Dec'24	Dec'23	Dec'25	Dec'24	Dec'23
Cash and current accounts with Central Bank	23,224	16,908	22,286	25,499	21,950	24,253
Placements with banks and public institutions	14,476	13,612	12,619	16,552	13,715	12,273
Treasury financial instruments	66,541	64,717	50,076	69,208	68,410	51,775
Loans and advances to customers, net	99,691	81,390	71,550	100,446	90,780	72,008
Finance lease receivables	-	-	-	6,264	5,590	3,563
Tangible and intangible assets	2,242	1,577	1,317	3,137	2,786	2,127
Right-of-use assets	560	769	698	589	587	514
Investments in subsidiaries	1,373	2,645	873	29	23	-
Investments in associates	-	-	-	-	-	1
Deferred tax assets	188	388	337	224	462	354
Other financial assets	1,826	2,013	1,830	2,020	2,327	1,980
Other non-financial assets	277	244	198	446	405	320
Total assets	210,398	184,264	161,785	224,414	207,035	169,169
Deposits from customers	168,862	150,785	134,443	175,250	167,869	138,053
Deposits from banks	321	1,174	1,082	302	951	1,035
Loans from banks and other financial institutions	14,604	11,209	8,584	17,123	12,238	9,549
Subordinated loans	2,466	2,405	2,404	2,643	2,531	2,423
Current tax liabilities	75	184	113	103	215	104
Provisions for other risks and charges	640	500	552	837	827	651
Financial liabilities from leasing contracts	596	748	670	624	617	533
Other financial liabilities	2,348	2,818	1,936	3,758	4,037	2,637
Other non-financial liabilities	395	221	172	475	313	288
Total liabilities	190,306	170,045	149,956	201,116	189,599	155,273
Equity	20,092	14,219	11,829	23,298	17,437	13,897
Total liabilities and equity	210,398	184,264	161,785	224,414	207,035	169,169

b) Statement of profit and loss

	Bank			Group		
Indicators (RONmn)	2025	2024	2023	2025	2024	2023
Net interest income	6,631	5,532	4,319	8,066	6,908	5,257
Net fees and commission income	1,388	1,268	1,106	1,623	1,488	1,268
Net trading income	894	707	540	1,227	938	657
Net income from financial assets measured at fair value through comprehensive income	66	164	166	67	167	168
Net income from financial assets which are required to be measured at fair value	434	282	178	248	159	143
Contribution to the Bank Deposit Guarantee Fund and to the Resolution Fund	(102)	(75)	(87)	(114)	(91)	(94)
Other operating income	474	344	215	544	492	326
Total operating income	9,786	8,224	6,437	11,661	10,061	7,725
Net expense from impairment allowance, expected losses on assets, provisions for other risks and loan commitments	(622)	(332)	(373)	(832)	(575)	(513)
Personnel expenses	(2,163)	(1,945)	(1,614)	(2,703)	(2,600)	(1,968)
Depreciation and amortization	(453)	(419)	(404)	(558)	(517)	(451)
Other operating expenses	(1,728)	(1,367)	(917)	(2,180)	(1,743)	(1,088)
Total operating expenses	(4,966)	(4,064)	(3,309)	(6,272)	(5,435)	(4,019)
Bargain gain	0	0	0	0	0	0
Profit before income tax	4,819	4,160	3,128	5,388	4,627	3,706
Income tax expense	0	0	(638)	0	0	(722)
Net profit	4,819	4,160	2,491	5,388	4,627	2,984
Profit of the Group attributable to equity holders of the Bank	4,819	4,160	2,491	0	0	2,890
Profit of the Group attributable to non-controlling interests	0	0	0	4,479	4,555	95
Net profit	4,819	4,160	2,491	4,479	4,555	2,984

At the end of 2025, Banca Transilvania's profit weighed 87.9% in the Group's total profit (74.7% in 2024 and 83.5% in 2023).

c) Cash flow: Statement of Cash Flows

Indicators (RONmn)	Bank			Group		
	2025	2024	2023	2025	2024	2023
Cash and cash equivalents at the beginning of the period	28,211	32,750	15,343	30,549	36,122	18,459
± Net cash from / (used in) operating activities	(1,796)	(1,741)	5,302	140	(3,959)	5,877
± Net cash from / (used in) the investment activity	11,574	(3,622)	6,558	11,594	839	6,603
± Net cash from/ (used in) the financing activity	582	823	5,547	175	(2,454)	5,183
Cash and cash equivalents at the end of the period	38,572	28,211	32,750	42,458	30,549	36,122

The statement of financial position is detailed in the Financial statements enclosed.

The following documents are enclosed with this report:

- The Separate and consolidated Report of the Board of Directors of Banca Transilvania for the year 2025 which includes also the non-financial statement on environmental, social and personnel issues, respect for human rights and the fight against corruption and bribery;
- The management statement on taking responsibility for drafting the financial statements for the year 2025;
- The financial statements, at individual and consolidated IFRS level, together with explanatory notes;
- The Independent Auditor's Report Deloitte Audit S.R.L., to the IFRS separate and consolidated financial statements.

The annual report shall be accompanied by copies of the following documents:

a) copies of supporting documents for all amendments made to the Articles of Association in 2025:

Please note that the decisions of the General Shareholders Meeting have been transposed into the Articles of Association, they have been implemented and approved by the competent bodies. We are attaching the amended articles of incorporation based on the GSM decisions.

b) resignation/dismissal documents regarding the members of the Board of Directors, executive management:

There were no acts of dismissal/resignation.

c) list of Bank's subsidiaries and companies controlled by the Bank - The list of BT Subsidiaries is enclosed as an Annex to this report (ANNEX 1);

d) list of Bank's affiliates - The list of related persons of BT is enclosed as an Annex to this report (ANNEX 2).

**CHAIRMAN OF THE
BOARD OF
DIRECTORS
HORIA CIORCILĂ**

**CHIEF EXECUTIVE
OFFICER
ÖMER TETİK**

**DEPUTY CHIEF
EXECUTIVE OFFICER
GEORGE CĂLINESCU**

ANNEX 1

Banca Transilvania Group (the “Group”) includes the Parent-company, Banca Transilvania S.A. (the “Bank”) and its subsidiaries, based in Romania and in the Republic of Moldova. The individual and consolidated financial statements as at 31.12.2025 comprise Banca Transilvania S.A. (the “Parent company” or “BT”) and its subsidiaries (hereinafter referred to as the “Group”).

The Group’s subsidiaries are represented by the following entities:

Subsidiary	Field of activity	Percentage of direct and indirect stake 2025	Percentage of direct and indirect stake 2024
Victoriabank S.A.	Financial and banking activities and investments subject to license	44.63%	44.63%
BCR Chişinău S.A.	Financial and banking activities and investments subject to license	-	44.63%
BT Capital Partners S.A.	Investments	99.62%	99.62%
BT Leasing Transilvania IFN S.A.	Leasing	100%	100%
BT Investments S.R.L.	Investments	100%	100%
BT Direct IFN S.A.	Consumer Loans	100%	100%
BT Building S.R.L.	Investments	-	100%
BT Asset Management SAI. S.A.	Asset Management	100%	100%
BT Solution Asistent în Brokeraj S.R.L.	Insurance Broker	-	100%
BT Asiom Agent de Asigurare S.R.L.	Insurance Broker	-	100%
BT Safe Agent de Asigurare S.R.L.	Insurance Broker	-	100%
BT Intermedieri Agent de Asigurare S.R.L.	Insurance Broker	-	100%
BT Leasing MD S.R.L.	Leasing	100%	100%
BT Microfinanţare IFN S.A.	Other lending activities	100%	100%
Improvement Credit Collection S.R.L.	Activity of the Collection Agents and Credit Reporting Bureaus	100%	100%
VB Investment Holding B.V.	Activities of holdings	61.82%	61.82%
BT Pensii S.A.	Administration of pension funds (except for those in the public system)	100%	100%
Salt Bank S.A.	Financial and banking activities and investments subject to license	100%	100%
Avant Leasing IFN S.A.	Financial leasing	-	100%
BT Broker de Asigurare S.R.L.	Insurance Broker	100%	100%
Code Crafters by BT S.R.L.	Custom software development activities	100%	100%
BTP One S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP Retail S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP Store Hub Turda S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP Store Hub Oradea S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
OTP Bank România S.A.	Services of financial and monetary intermediation	-	100%

Inter Terra S.R.L.	Buying and selling of own real estate	99.73%	100%
OTP Advisors S.R.L.	Investments	-	100%
OTP Factoring S.R.L.	Asset management	100%	100%
REA Project One Company S.R.L.	Real estate development	-	100%
GOVCKA Project Company S.R.L.	Real estate development	-	100%
OTP Consulting România S.R.L.	Other activities auxiliary to financial services, except insurance and pension funding	-	100%
INNO Investments S.A.I. S.A. (OTP Asset Management SAI S.A.)	Asset Management	100%	100%
O.C.N. Microinvest S.R.L.	Other lending activities	44,63%	-
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	Activities of pension funds (except those in the public social security system)	100%	-
Secure Cash Express SRL	Investigation activities and private protection services	100%	-
Microinvest Technology SRL	Custom software development activities	44,63%	-

Based on material concept as defined in paragraph 7 of IAS 1, the Group has decided to exclude several subsidiaries from the consolidation perimeter, as their exclusion is not expected to have a significant effect on the consolidated financial statements. The decision to exclude them from consolidation is based on an assessment of both quantitative and qualitative factors, which included the size of the subsidiaries and their non-material impact on the Group as a whole.

As of December 31, 2025, the list of excluded subsidiaries from the consolidation perimeter and the reasons for their exclusion is shown below:

Subsidiary	reasons for exclusion
Code Crafters by BT S.R.L.	no significant assets or liabilities, expenses or revenues
BTP Retail S.R.L.	no significant assets or liabilities, expenses or revenues
BTP Store Hub Oradea S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Factoring S.R. L	no significant assets or liabilities, expenses or revenues
Secure Cash Express SRL	no significant assets or liabilities, expenses or revenues
Microinvest Technology	no significant assets or liabilities, expenses or revenues
Sinteza (associate)	no significant assets or liabilities, expenses or revenues

As at December 31, 2024 the list of excluded subsidiaries from the consolidation perimeter and the reasons for their exclusion is shown below:

Subsidiary	reasons for exclusion
Code Crafters by BT S.R.L.	no significant assets or liabilities, expenses or revenues
Fond Alternativ BTP Retail S.R.L.	no significant assets or liabilities, expenses or revenues
BTP Store Hub Oradea S.R.L.	no significant assets or liabilities, expenses or revenues
BT Intermedieri Agent de Asigurare S.R.L.	no significant assets or liabilities, expenses or revenues
BT Asiom Agent de Asigurare S.R.L.	no significant assets or liabilities, expenses or revenues
BT Solution Asistent în Brokeraj S.R.L.	no significant assets or liabilities, expenses or revenues
BT Safe Agent de Asigurare S.R.L.	no significant assets or liabilities, expenses or revenues
REA Project One Company S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Factoring S.R.L.	no significant assets or liabilities, expenses or revenues
GOVCKA Project Company S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Advisors S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Consulting Romania S.R.L.	no significant assets or liabilities, expenses or revenues
Sinteza (associate)	no significant assets or liabilities, expenses or revenues

In addition to the qualitative factors, namely nature of activity of excluded subsidiaries, future plans of the Group to centralize their activity in other bigger subsidiaries, the potential impact of the exclusion of subsidiaries on the consolidated financial statements is performed based on

quantitative factors like assets, liabilities, net profit, expenses and revenues. The assessment is performed on an entity-by-entity basis, and an additional analysis is conducted on the potential impact of total excluded subsidiaries in total figures of the Group, as shown in the table below:

<i>RON thousand</i>	2025	2024
total assets of excluded subsidiaries	13,325	9,471
% of total assets of excluded subsidiaries in total assets of the Group	0.01%	0.01%
Total liabilities of excluded subsidiaries	18,179	16,315
% of total liabilities of excluded subsidiaries in total liabilities of the Group	0.01%	0.01%
P&L of excluded subsidiaries	7,451	4,857
% of total P&L of excluded subsidiaries in total P&L of the Group	0.16%	0.10%
Total expenses of excluded subsidiaries	101,454	56,391
% of total expenses of excluded subsidiaries in total expenses of the Group	0.06%	0.04%
Total revenues of excluded subsidiaries	108,905	61,248
% of total revenues of excluded subsidiaries in total revenues of the Group	0.07%	0.04%

The exclusion of these subsidiaries does not materially affect the Group's consolidated financial position, financial performance, cash flows or other elements of the consolidated financial statements. Given that these subsidiaries were deconsolidated starting from December 31, 2024, their expenses and revenues up to the date of deconsolidation are included in the consolidated statement of profit or loss of the Group.

ANNEX 2

THE BANK'S RELATED PARTIES
as at 31.12.2025

NR.CRT.	NAME
1	A C I CLUJ SA
2	ACHIM ALIN ION
3	ACHIM ANDREEA
4	ACT MANAGEMENT SERVICES B.V.
5	ADMIN DEVELOPMENT DESIGN SRL
6	ALEXANDRU VALENTINA
7	ALL PLUS IT SRL
8	ALPHA ENERGY SRL
9	ANGHEL ADRIAN
10	ANGHEL LAURA
11	ANGHEL MARIA-GABRIELA
12	ANGHEL MARIA-GABRIELA II
13	ANGHEL ROBERT MIHAI
14	ANTARES TRANSLATIONS SRL
15	ANTREPRIZA CLUJ ZALAU SA
16	ASOCIATIA CLUB SPORTIV U-BT
17	ASOCIATIA CLUB SPORTIV WINNERS TENNIS CLUB
18	ASOCIATIA CORPUL OPERATORILOR ARHIVEI ELECTRONICE
19	ASOCIATIA PLAYFIELD
20	ASOCIATIA TRANSILVANIA EXECUTIVE-EDUCATION
21	AURSULESEI MIHAI MIRCEA
22	AVIATIQ SUPPORT SRL
23	AXA MANAGEMENT CONCEPT SRL
24	BAIASU MARIA
25	BAIASU MARIUS
26	BAICAN ALEXANDRA DANIELA
27	BALASANIAN ARSAVIR TEODOR
28	BALASANIAN RAMONA
29	BANCA TRANSILVANIA SA
30	BANU DRAGOS MIHAI
31	BANU IULIANA
32	BEAUTY CANVAS SRL
33	BENEA DANA CORINA
34	BERINDEAN CATALIN VASILE
35	BERINDEAN MONICA IOANA
36	BERNAT AUREL
37	BERNAT LIGIA MARIA
38	BETTER BREAD S R L
39	BILLIE UK
40	BIRLE IOAN
41	BIRLE LILIANA DORINA
42	BIRLE T LILIANA-DORINA - CABINET INDIVIDUAL DE PSIHOLOGIE

43	BORDEA MIRELA ILEANA
44	BOTT CONSTANTIN CATALIN
45	BOTT NICOLETA
46	BOUTIQUE DEVELOPMENT SRL
47	BRD SOC DE ADM A FONDURILOR DE PENSII PRIVATE SA
48	BRUTEANU VIOLETA-MONICA
49	BT ASSET MANAGEMENT S A I SA
50	BT BROKER DE ASIGURARE S.R.L.
51	BT CAPITAL PARTNERS
52	BT DIRECT IFN SA
53	BT INVESTMENTS SRL
54	BT LEASING MD
55	BT LEASING TRANSILVANIA SA
56	BT MICROFINANTARE IFN S.A.
57	BT PENSII - SOCIETATE DE ADMINISTRARE A FONDURILOR DE PENSII FACULTATIVE S.A.
58	BTP ONE SRL
59	BTP RETAIL S R L
60	BTP STORE HUB ORADEA S R L
61	BTP STORE HUB TURDA S.R.L.
62	BUCIN OVIDIU
63	BUCIN SIMONA
64	BUDUROIU MIRELA LENUTA
65	BUNEA IOANA CATALINA
66	BUSINESS SUPT SRL
67	CA&BI CONT SRL
68	CALIN COSMIN ANTOINE CONSTANTIN
69	CALINESCU DANIELA MIHAELA
70	CALINESCU GEORGE RAZVAN
71	CANTINA DEJ SA
72	CAPITALIO HOLDING S.R.L.
73	CARAGEA CATALIN-IOAN
74	CARAGEA ROXANA IOANA
75	CARAGHIAUR ALEXANDRU
76	CARAGHIAUR SIMONA
77	CASTORIUS LIMITED
78	CAZAN ADRIANA ELVIRA
79	CAZAN CRISTIAN GABRIEL
80	CB EXPERT CONT S R L
81	CC ADVANCED TEAM SRL
82	CC PRO LEVEL SRL
83	CEGRIAS SRL
84	CENTRAL SA
85	CHERNYSHOVA OLENA
86	CHESA RUXANDRA LAURA
87	CIORCILA HORIA

88	CIORCILA PATRICK
89	CIORCILA SIMONA NICULINA
90	CMD EXPERT S.R.L.
91	CODE CRAFTERS BY BT S.R.L.
92	COJOCARU CORINA-MADALINA
93	COJOCARU DANIEL
94	COJOCARU DAN-IOAN
95	CONDOR ANNAMARIA KATALIN
96	CONDOR CALIN PAUL
97	CONSTRUCTII DEJ SA
98	CONTINUUM SRL
99	CORAS ELIZA-LAURA
100	CORNICIUC VITALIE
101	COROIU MIHAELA-ADELA
102	COROIU VALENTIN-REMUS
103	COSTIN ADVISER S.R.L.
104	COSTIN LUDMILA
105	CRACIUN ANCA EUGENIA
106	CRACIUNAS ANDREEA SORANA
107	CRACIUNAS ANDREEA SORANA PFA
108	CRACIUNAS MARIUS CALIN
109	CREATIVE BRANDS DISTRIBUTION SRL
110	DACRI BUSINESS CONSULTING S.R.L.
111	DASCAL SERGIU DAN
112	DELTA IMMO CONSULTING SRL
113	DICAMO CONSULTING
114	DOMINIAK ANDRZEJ KLAUDIUSZ
115	DOMINION INVEST SA
116	DONICA VASILE
117	DRAGOMIR RALUCA-IRINA
118	DRAGOMIR STEFAN DAN
119	DREAM GOLF RESIDENCE
120	DUMA GEORGIANA ADINA
121	DUMA LUCIAN BOGDAN
122	DUMITRESCU SORIN
123	DUNCA A. ISABELA- CABINET MEDICAL DE MEDICINA DE F
124	DUNCA ISABELA
125	DUNCA NELU
126	EFFICIENT GLOBAL SERVICES S R L
127	ELBA NOVO SRL
128	ENE ANA MARIA
129	ENE MARIAN
130	ENERGYGLOD S R L
131	FC U CLUJ RETAIL S.R.L.
132	FINAS CENTRAL SRL
133	FLOREA ALINA

134	FRANKLIN PETER MORRIS
135	FUNDATIA CENTRUL DE DEZVOLTARE MANAGERIALA
136	FUNDATIA CLUBUL INTREPRINZATORULUI ROMAN
137	FUNDATIA CLUJUL ARE SUFLET
138	FUNDATIA SENS
139	FUNDATIA TRANSILVANIA
140	GADI EOOD
141	GAZ MARIA
142	GIURGIU BIANCA VIORICA
143	GOGU DANIELA
144	GOGU GABRIEL
145	GRASSE BURKLE PAULA
146	GRASSE THOMAS GUNTHER
147	GUEORGUIEV IVO ALEXANDROV
148	HEXAGON LOGISTICS S R L
149	IANCU CODRUTA STEFANIA
150	IANCU HOREA RADU
151	IG INVEST
152	ILAS DAN GEORGE
153	ILAS IOANA MIHAELA
154	IMPROVEMENT CREDIT COLLECTION SRL
155	INNO INVESTMENTS S.A.I S.A.
156	INTER SAT SRL
157	INTER TERRA SRL
158	INTERA FINANCIAL SERVICES
159	INTUITIVE TEACHING CENTER SRL
160	IRIMIEA VICTOR TUDOR
161	JOITA DRAGOS
162	KAFSINKAF SRL
163	KAMALUX S R L
164	KHANIKYAN LEVON
165	KIRCALI SEDA
166	KIRCALI SINAN
167	LINEARIS CAPITAL S.R.L.
168	LIONACHESCU AIDA
169	LIONACHESCU AIDA PFA
170	LIONACHESCU COSTEL
171	LK MANAGEMENT SOLUTIONS SRL
172	LUCYNA STANCZAK-WUCZYNSKA
173	M&B 2003 SRL
174	MACT SRL
175	MALOS ELENA IONELA
176	MANOLESCU ALICE EMANUELA
177	MANOLESCU DRAGOS GABRIEL
178	MANSOUR TATIANA
179	MATES MARIA

180	MATYUS ECATERINA ELENA
181	MAVE CONSULTING SRL
182	MAZURCHIEVICI ANDREI-ALEXANDRU
183	MAZURCHIEVICI DIANA IOANA
184	MICROCREDIT AD
185	MICROINVEST TEHNOLOGY
186	MICU VLAD TEODOR
187	MILCHIS ADINA
188	MILCHIS VASILE MIHAI
189	MIRCEA FLORENTINA VIRGINIA
190	MIRCEA VALENTIN
191	MIT SERV SRL
192	MLAD CONSULT SRL
193	MOISA EMILIA SANDA
194	MOISA TIBERIU
195	MORADIS CONSULTING SRL
196	MORAR ADINA IULIA
197	MORAR IONUT CALIN
198	MOVEMENT TEAM S.R.L.
199	MT MANAGEMENT EVENTS SRL
200	MULTIGUARD SRL
201	MUNTEANU-CRISAN DELIA
202	MUNTEANU-CRISAN MIHAI-PAUL
203	NEGRILA OVIDIU
204	NEGRILA OVIDIU PFA
205	NICOLESCU IOANA
206	NICOLESCU MIHAI CRISTIAN
207	NISTOR GABRIELA CRISTINA
208	NISTOR IOAN ALIN
209	NISTOR ROXANA MARIA
210	NISTOR STELIAN MIHAI
211	O.C.N MICROINVEST SRL
212	OBLU EXIM S.R.L.
213	OLANESCU IOANA FLORINA
214	OPRIS SIMONA ALINA
215	OTP FACTORING SRL
216	PALECREST BULGARIA
217	PASCU RADU
218	PAYNETICS EAD
219	PAYNETICS UK LTD
220	PAYQUIRE LIMITED
221	PHOS BULGARIA EOOD
222	PHOS SERVICES LTD
223	PHYRE JSC
224	PHYRE NEXT LEVEL
225	PINTILIE IOANA

226	PINTILIE VLAD
227	PIRVU MIHAELA NINA
228	PISLARU ANGELA MONICA
229	PISLARU MARIUS-ANDREI
230	PLAYFIELD TEAM SRL
231	PLESUVESCU BOGDAN
232	POESIA 21 ACT S R L
233	POP MARIAN RODION
234	POP OANA LELIA
235	POPA BOGDAN DUMITRU
236	PORTASE CORINA
237	PORTASE RAZVAN-FLORIN
238	POSTOLACHE FRANCESCA
239	PREDESCU-VASVARI FLORIN-DANUT
240	PREDESCU-VASVARI MIRELA RALUCA
241	PREVA ADVISORY LIMITED
242	PREVA CAPITAL S R L
243	PRISACARU ROXANA-ALICE
244	PRIVATE CAPITAL ADVISORY LIMITED
245	PUHALSCHI IULIANA
246	PUHALSCHI RADU CRISTIAN
247	PUSCAS MARIANA
248	PUSCAS MARIANA CABINET MEDICAL
249	PUSCAS VASILE
250	QUATTRO CONSULTING SRL
251	R & T SERVICII SRL
252	RENAISSANCE NAILS SRL
253	RF METERS S R L
254	RIVETING SA
255	ROM CERT EURO SRL
256	ROMOTO GmbH
257	ROSSI FRANCO
258	ROTARU GEORGIANA
259	ROTARU MIHAI STELIAN
260	ROXMAR SRL
261	RUNCAN LUMINITA DELIA
262	RUNCAN MIREL
263	RUSSELL HENRY EMANUEL
264	SABAZ MEHMET MURAT
265	SABAZ OZLEM
266	SALT BANK S.A.
267	SALZBERGWERK RESSOURCEN UND INVESTITIONEN SRL
268	SAMURAI ETHICS S R L
269	SAVIN ALEXANDRU
270	SECARA DANIELA
271	SECRET BOX EVENTS S.R.L.

272	SECURE CASH EXPRESS S R L
273	SERBAN LIVIU ONUT
274	SIGUR AUTOTRANSPORT SRL
275	SIMA IOANA MARIA
276	SIMA RAZVAN IOAN
277	SIMEONOVO HILLS LTD
278	SINDILE CRISTINA DALIA
279	SINDILE MARIUS
280	SINTEZA SA
281	SKY TREE SRL
282	STANCZAK-WUCZYNSKA LUCYNA MARIA
283	STOICA ELENA CORINA
284	STOICA RAZVAN LAURENTIU
285	STROE ANDREEA CLAUDIA
286	STROE IONUT FLORENTIN
287	SVINARENCO DUMITRU
288	SZEKELY DANIEL
289	TANCAU IOANA
290	TARGET CONSULTING INVEST SRL
291	TEHNOFRIG CENTER SA
292	TETIK ALEXANDRA
293	TETIK OMER
294	THE 365 MANAGEMENT SOLUTION S.R.L.
295	TODERICI AURELIA ELVIRA
296	TODERICI LEONTIN
297	TOMOIAGA CAMELIA GEORGIANA
298	TOMOIAGA GHEORGHE
299	TORGIE ANICA
300	TORGIE TEODOR
301	TUPA PAUL
302	TURCAN NICOLAE VICTOR
303	TURCAN ROMAN
304	TURCU VASILE COSMIN
305	TURISM LOTUS FELIX SA
306	TVERCO TRADING SRL
307	U-BT FAN SHOP S R L
308	URBAN ROOTS SRL
309	URS PETRU
310	VALEVA GLORIA
311	VASILACHE ANNEMARIE
312	VASILACHE DANIEL GEORGE
313	VASILE ALINA
314	VASILE VIOREL
315	VB INVESTMENT HOLDING BV
316	VICTORIABANK SA
317	VIKRAM TIKOO

318	VITRINA ADVERTISING S R L
319	VOUILLOUX ANNIE JEANNE
320	WINNERS CENTER SA
321	WINNERS EVENTS SRL
322	WINNERS FIRST SRL
323	WINNERS HOLDING INVESTMENTS S.R.L.
324	WINNERS PARCUL ROZELOR SA
325	WINNERS RESOURCES SRL
326	WINNERS SPORTS ARCHITECTS SRL
327	YAMAN REAL ESTATE DEVELOPMENT SRL

Comply-or-Explain Statement (CES) Company Name: Banca Transilvania S.A.

Section	Principle	Prov No	Provision (detailed)	Yes	Partial	No
A: GOVERNING BODIES	A.1. The Board should ensure the Company's long-term success and sustainability for the best interest of the Company and its shareholders and taking into account the interests of other stakeholders. The Board should clearly define and disclose the full scope of its roles and responsibilities.	A.1., 1	The Board should have an internal regulation that formalises and clearly states its roles and responsibilities. The articles of association, Board's internal regulation and other internal regulations should clearly delineate the roles and competencies among the Board, general meeting of shareholders (GMS) and executive management.	X		
A: GOVERNING BODIES	A.1. The Board should ensure the Company's long-term success and sustainability for the best interest of the Company and its shareholders and taking into account the interests of other stakeholders. The Board should clearly define and disclose the full scope of its roles and responsibilities.	A.1., 2	Board's internal regulation should include, among others, the Board's responsibilities as well as fiduciary duties of directors to act on a fully informed basis, in good faith, with due diligence and care, and in the best interest of the Company, its shareholders and taking into account the interests of other stakeholders in line with legal requirements.	X		
A: GOVERNING BODIES	A.1. The Board should ensure the Company's long-term success and sustainability for the best interest of the Company and its shareholders and taking into account the interests of other stakeholders. The Board should clearly define and disclose the full scope of its roles and responsibilities.	A.1., 3	To sustain the Company's long-term viability and success, the Board should: ·Oversee the development and approve the Company's strategy and ensure that it also integrates sustainability aspects, including environmental and social (E&S) considerations and climate-related risks and opportunities; ·Appoint and dismiss CEO and other executives to whom executive management responsibilities were delegated (called executive management) and ensure their succession planning; ·Oversee the management performance, management role in addressing material sustainability risks and opportunities and align the remuneration of executive management with the long-term interests and sustainability of the Company, according to the provisions of the Company's remuneration policy; ·Ensure there is a sound framework for internal controls and risk management; ·Ensure that the Company has in place procedures to enable effective communication with shareholders and other stakeholders.	X		
A: GOVERNING BODES	A.1. The Board should ensure the Company's long-term success and sustainability for the best interest of the Company and its shareholders and taking into account the interests of other stakeholders. The Board should clearly define and disclose the full scope of its roles and responsibilities.	A.1., 4	Duration of appointment of Board and executive management should be set clearly and should, to the extent possible, foster stability and predictability.	X		
A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 1	The Board should have at least five members.	X		
A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 2	The Board should have in place a policy on Board and executive management diversity and should ensure that diversity requirements in terms of gender, age, experiences and skills are incorporated in the Nomination Policy.	X		
A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 3	The Board should develop a Board profile which specifies the desired characteristics and traits of its members including factors such as independence, diversity, integrity, specific skills and experience, industry knowledge, ability and willingness to devote adequate time and effort to Board responsibilities in the context of the needs of the Board and its committees and their exercise of the Board's strategic and oversight roles. The Board profile can be part of the Nomination Policy.	X		
A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 4	The majority of the members of the Board should be non-executives. At least a third of the Board members should be independent. Each independent member of the Board should submit a declaration regarding his/her independence at the time of his/her nomination for election or re-election as well as when any change in his/her status arises, as per the criteria of independence defined in law and in Appendix A to the Code.	X		

A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 5	The Nomination and Remuneration Committee (or the entire Board if there is no Nomination and Remuneration Committee) should assess whether the directors can be considered independent under the factors taken into account, by examining whether there are any business or other personal relationships that could materially affect the independence and objectivity of the director and his/her ability to act in the best interests of the Company, its shareholders and stakeholders.	X		
A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 6	The positions of Chairperson and Chief Executive Officer (CEO) are recommended to be held by different individuals.	X		
A: GOVERNING BODIES	A.2. The Board should have an appropriate balance of skills, experience, gender diversity, knowledge and independence to enable it to effectively perform its duties and responsibilities.	A.2., 7	If the Chairperson and CEO functions are performed by the same person, it is recommended that the Board appoints an independent Vice-Chairperson.	X		
A: GOVERNING BODIES	A.3. The Board should ensure that a formal, rigorous and transparent procedure is put into place regarding the nomination of new members to the Board.	A.3., 1	The Company should develop and disclose a board nomination policy (“Nomination Policy”) that should define the processes and procedures for the nomination, election or replacement of a director. The Nomination Policy, approved by the competent governance body, shall describe how the Company receives and evaluates nominations from shareholders (including minority shareholders) or from members of the Board, including in relation to the board profile, independence and diversity.	X		
A: GOVERNING BODIES	A.3. The Board should ensure that a formal, rigorous and transparent procedure is put into place regarding the nomination of new members to the Board.	A.3., 2	The Board, through its Nomination and Remuneration Committee, if established, should monitor the nomination process of candidates for the position of Board member.	X		
A: GOVERNING BODIES	A.3. The Board should ensure that a formal, rigorous and transparent procedure is put into place regarding the nomination of new members to the Board.	A.3., 3	The Company should disclose to shareholders information on the experiences and CV of the director candidates that they require to make an informed decision on the appointment or reappointment of the directors including the following: ·candidates’ professional commitments and engagements, including executive and non-executive positions in companies, public authorities, not-for-profit bodies or other organisations; ·any existing or potential conflicts of interest including whether they have business, family or other relationships that could affect their performance as directors on the Board; ·which shareholder or member of the Board proposed each candidate for the Board positions.	X		
A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 1	The Board shall establish an Audit Committee to enhance its oversight capability over the financial reporting, internal control framework, internal and external audit processes, and compliance with applicable laws and regulations. Where a separate risk management committee is not required by law or already established, the Audit Committee will also include oversight responsibilities for the efficiency of the risk management framework.	X		
A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 2	The Audit Committee is recommended to be composed of non-executive directors. The majority of the Committee members is recommended to be independent, including the Committee chairperson. The Audit Committee, as a whole, should have competencies relevant to the Company’s area of operations. The Committee and its members should comply with the applicable national and European legislation.	X		
A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 3	The Boards of Premium Tier companies should set up a Nomination and Remuneration Committee formed of non-executive directors. The majority of the Committee members is recommended to be independent, including the Committee chairperson. The Board may also establish a separate Nomination Committee and a separate Remuneration Committee if the Board composition accommodates it and if this is justified given the Company’s size and complexity of its business and governance structures.	X		
A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 4	In addition to its specific responsibilities as provided under this Code, the Nomination and Remuneration Committee should: i.Review and recommend to the Board the size and composition of the Board and lead the development and ongoing review of the Board profile; ii.Identify individuals qualified to become Board members and members of the executive management, if requested; evaluate the candidates for executive management roles; evaluate the candidates proposed by the shareholders or by Board members for a director role and inform the GMS accordingly; iii.Make recommendations to the Board concerning committee appointments (other than the Nomination and Remuneration Committee); iv.Coordinate an annual evaluation of the Board, directors and committees in line with provisions set out in Principle A.5.; v.Assist the Board in fulfilling its responsibilities related to the Company’s remuneration policy; vi.Assist the Board in the development of the succession plans for executive management, as well as the emergency succession plans and CEO search process, as required; vii.Oversee the administration of the Company’s compensation and benefits plans.	X		

A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 5	The role and responsibilities of Board committees should be defined in separate internal regulation (operating regulations) and disclosed on the Company's website. If the Company chooses not to establish any of the Board committees not required by law, the corresponding tasks and responsibilities shall be done by the Board and should be adequately stated in the Board's internal regulation.	X		
A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 6	The evaluation of independence for the members of the committees, including when the members of the committees are appointed by the GMS, shall be carried out according to the same procedure applicable to the independent members of the Board.	X		
A: GOVERNING BODIES	A.4. The Board should establish committees which should assist the Board in the performance of its key responsibilities, dealing with strategic challenges and in managing sensitive issues with high potential for conflicts of interest.	A.4., 7	The chairpersons of the Audit Committee and Nomination and Remuneration Committee should not be the Chairperson of the Board or of any other committee, unless this is justified by the size of the Board..	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 1	The Board Chairperson is primarily responsible for ensuring that the Board functions properly. The Board's internal regulation should contain the role and responsibilities of the Board Chairperson and the Board Chairperson, at a minimum, should: •Determine the agenda of the Board meetings, chair such meetings and ensure that minutes are kept of such meetings; •Ensure the Board receives accurate, timely, useful, succinct information to enable the Board to make sound decisions; •Ensure the Board has sufficient time for consultation and decision-making; •Enable the Committees to function properly and that there is effective communication with Board committees, including actionable, insightful reports of committees back to the full Board; •Ensure the performance of the Board is evaluated and discussed at least once a year and disclosed as per provision D.1.3; •Ensure that the Board has proper working relationship with the executive management. The CEO and the Chairman of the Board (if positions are held by different individuals) shall meet regularly; •Address and manage internal disputes and conflicts of interest concerning Board members.	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 2	The Board should meet as often as necessary but not less than six (6) times a year.	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 3	The Board can request to designate the Corporate Secretary who should assist the Board in complying with its obligations under law, Board internal regulation and other policies. The Corporate Secretary should be a senior officer in the Company tasked with assisting the Board and its committees in organising their activities, in preparing for the meetings, annual Board and committee performance evaluation and director training programs, if the case.	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 4	The Board should clearly define the rights and responsibilities, scope of authority and other issues related to the Corporate Secretary.	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 5	The Board and its committees should develop and approve an annual internal work plan identifying topics to address during the year before the end of the previous year. The plan should take into account decisions that need to be proposed to the GMS, reporting by management and internal control functions, the required frequency of Board and Committee meetings, and should be reviewed by the Chairperson, assisted by the Corporate Secretary.	X		

A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 6	The Board should conduct an annual evaluation of the composition, activity and dynamics of the Board and its committees, individually and as a whole, and which should be coordinated by the Nomination and the Remuneration Committee.	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 7	The Nomination and Remuneration Committee should share the results of the Board evaluation with the whole Board and should then set follow up actions, if any, including professional development and training plans for the Board to fill gaps.	X		
A: GOVERNING BODIES	A.5. The Board should set up robust Board operating procedures as well as Board evaluation and continuous development mechanisms to improve directors' skills and their ability to effectively deliver their responsibilities.	A.5., 8	The Board's internal regulation should require Company orientation (induction) programmes for newly appointed directors, ensured by internal staff of the Company. The Board's internal regulation can also include references for ongoing director education program, if needed. The implementation of any orientation and ongoing trainings programmes for directors (as per the Board decision) is made under the oversight of the Nomination and Remuneration Committee, with the support of the Corporate Secretary. Based on the results of the annual board evaluation, the Nomination and Remuneration Committee jointly with the Board Chairperson shall develop professional development programmes focusing on the areas where capacity should be built among Board members.	X		
A: GOVERNING BODIES	A.6. Executive management is responsible for day-to-day management of the Company. The Board should ensure that the executive management is capable of effectively running the Company and that its composition, competence, roles and management incentives support the successful implementation of Company's strategy and plans.	A.6., 1	Executive management should run the Company and be accountable to the Board. Division of responsibilities between the Board and the executive management and between different members of the executive management should be clearly articulated in the Company's by-laws and the internal regulations of the Company.	X		
A: GOVERNING BODIES	A.6. Executive management is responsible for day-to-day management of the Company. The Board should ensure that the executive management is capable of effectively running the Company and that its composition, competence, roles and management incentives support the successful implementation of Company's strategy and plans.	A.6., 2	When Board Chairperson and CEO roles are exercised by one individual, the different responsibilities of the Board Chairperson and CEO should be clearly defined and distinguished in the Company by-laws.	X		
A: GOVERNING BODIES	A.6. Executive management is responsible for day-to-day management of the Company. The Board should ensure that the executive management is capable of effectively running the Company and that its composition, competence, roles and management incentives support the successful implementation of Company's strategy and plans.	A.6., 3	The Board should ensure that the executive management is comprised of persons with adequate knowledge, skills, diversity and experience to support successful Company performance and that there are measures in place to provide for the orderly succession of executive management.	X		
A: GOVERNING BODIES	A.6. Executive management is responsible for day-to-day management of the Company. The Board should ensure that the executive management is capable of effectively running the Company and that its composition, competence, roles and management incentives support the successful implementation of Company's strategy and plans.	A.6., 4	The Board, with the support of the Nomination and Remuneration Committee, should annually evaluate executive management's performance, the effectiveness of its cooperation with the Board, including the information provided to the Board.	X		

B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK						
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The Company should have an adequate and effective internal control framework and an enterprise risk management framework, taking into account its strategy, size, complexity of operations and risk profile including potential environmental and social impact of its activities.	B.1., 1	The Board determines the nature and extent of the risks the Company is willing to take necessary for the achievement of Company's strategic objectives (i.e., the Company's risk appetite) and should ensure there are clear structures, policies and procedures in place that identify, evaluate, report, manage and monitor significant and emerging risks, including risks related to sustainability, cybersecurity and the use of digital technologies. The Board should explain in the annual report the mechanisms and processes in place to identify and manage risks.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The Company should have an adequate and effective internal control framework and an enterprise risk management framework, taking into account its strategy, size, complexity of operations and risk profile including potential environmental and social impact of its activities.	B.1., 2	The Board should adopt a formal risk management policy, to ensure accurate, complete and timely identification, measurement and reporting of risks, adequate and feasible risk control measures as well as integration of an E&S risks into the risk management framework in support of the Company's strategy implementation.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The Company should have an adequate and effective internal control framework and an enterprise risk management framework, taking into account its strategy, size, complexity of operations and risk profile including potential environmental and social impact of its activities.	B.1., 3	The Board and Audit Committee should understand emerging information technology and artificial intelligence-related changes so to mitigate cybersecurity risks. Time should be given to the AI risks and opportunities and cybersecurity on Board agenda to ensure understanding of cyber protection.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The Company should have an adequate and effective internal control framework and an enterprise risk management framework, taking into account its strategy, size, complexity of operations and risk profile including potential environmental and social impact of its activities.	B.1., 4	The Company is recommended to establish a risk management function responsible for ensuring accurate, complete and timely identification of the risks, ensuring that adequate and feasible risk control measures are in place and monitoring the risk management procedures. The risk management function, through the Chief Risk Officer (CRO), where present, should have a direct communication and functional reporting to the Board and Audit Committee (if there is no separate Risk Committee).	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The Company should have an adequate and effective internal control framework and an enterprise risk management framework, taking into account its strategy, size, complexity of operations and risk profile including potential environmental and social impact of its activities.	B.1., 5	The Board with the assistance from the Audit Committee should at least annually assess the adequacy and effectiveness of Company's risk management and internal control framework (including operational and compliance controls) and make relevant recommendations. The assessment should consider the effectiveness and scope of the internal audit function, the adequacy of risk management and compliance, internal control reports, if they are required by applicable legislation, to the Audit Committee, management's responsiveness and effectiveness in dealing with identified internal control failings or weaknesses and submission of relevant reports to the Board.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The Company should have an adequate and effective internal control framework and an enterprise risk management framework, taking into account its strategy, size, complexity of operations and risk profile including potential environmental and social impact of its activities.	B.1., 6	The Company should develop and make available on a free of charge basis on the Company's website a whistle-blowing mechanism which would enable employees and stakeholders to make reports about suspected breaches or wrongdoings as per the applicable legislation in place.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee should assist the Board with ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework and maintaining an appropriate relationship with the Company's external auditors.	B.2., 1	In addition to its responsibilities mentioned in legislation and elsewhere in the Code, the Audit Committee should: ·Review the Company's internal controls and risk management frameworks; ·Oversee the development and application of the Company's policies on conflicts of interests and related party transactions; ·Ensure independence and review the effectiveness of the Company's internal audit function and make a recommendation to the Board; ·Oversee the internal audit function; ·Oversee the preparation of sustainability-related reports and information included in them, unless this task is assigned to another committee; ·Oversee the framework for ensuring the Company's compliance with applicable legal and regulatory requirements and internal regulations of the Company (like the procedures for reporting breaches of the law or the Company's Code of Conduct), unless this task is assigned to another committee.	X		

B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee should assist the Board with ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework and maintaining an appropriate relationship with the Company's external auditors.	B.2., 2	Whenever the Code mentions reviews or analysis to be exercised by the Audit Committee, these should be followed by regular (at least annual) or ad-hoc reports to the Board.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee should assist the Board with ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework and maintaining an appropriate relationship with the Company's external auditors.	B.2., 3	The Audit Committee should monitor the independence and objectivity of the external auditor. The Committee should approve a policy on the provision of permitted non-audit services by the external auditor in line with legal requirements and enforce implementation of that policy. Committee's findings regarding the independence of the external auditor should be disclosed in the annual report.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee should assist the Board with ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework and maintaining an appropriate relationship with the Company's external auditors.	B.2., 4	The Audit Committee should discuss the annual audit work plan with the external auditor covering the scope and materiality of the activities to be audited. The audit committee should meet the external auditor as needed to discuss issues identified and to monitor the quality of the services provided.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board should ensure the independence of the internal audit function. Company's internal audit function should provide independent and objective assurance on the effectiveness of risk management framework and internal control framework.	B.3., 1	The Board should ensure that the internal audit has the authority, resources and procedures adequate to assist the Board in ensuring effectiveness and efficiency of the Company's risk management and internal control framework.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board should ensure the independence of the internal audit function. Company's internal audit function should provide independent and objective assurance on the effectiveness of risk management framework and internal control framework.	B.3., 2	To ensure fulfillment of the core functions of the internal audit function, the head of the function should be appointed by and report functionally directly to the Board via the Audit Committee, who shall be tasked with approving his/her appointment and dismissal. This is without prejudice to administrative reporting to the CEO and sharing information with the Company's executive management, in line with legal requirements and professional standards.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board should ensure the independence of the internal audit function. Company's internal audit function should provide independent and objective assurance on the effectiveness of risk management framework and internal control framework.	B.3., 3	The internal audit function should be established in line with applicable legal requirements and industry standards (e.g., Institute of Internal Auditors). The internal audit authority, composition, remuneration, annual budget, working procedures and other relevant matters shall be regulated in separate internal audit's internal regulation approved by the Board, following the recommendation of the Audit Committee.	X		
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board should ensure the independence of the internal audit function. Company's internal audit function should provide independent and objective assurance on the effectiveness of risk management framework and internal control framework.	B.3., 4	The Audit Committee should agree an annual internal audit work plan with the internal auditor, receive internal audit reports, updates on key audit issues, monitor implementation of recommendations of the internal audit and provide necessary guidance.	X		
C: PERFORMANCE, MOTIVATION AND REWARD						
C: PERFORMANCE, MOTIVATION AND REWARD	C.1. Members of the Board shall receive remuneration corresponding to the volume and weight of powers and their responsibilities, rather than the performance of management or the Company. The structure and amount of director's remuneration should enable the Company to attract, retain and motivate the competent and qualified directors.	C.1., 1	Board members should receive remuneration, as per the Remuneration Policy of the Company. Members who also serve on Board committees should receive additional remuneration for this work. But in no circumstances should the remuneration be linked to the number of board or committee meetings.	X		

C: PERFORMANCE, MOTIVATION AND REWARD	C.2. The Board shall ensure there is a formal and transparent policy and procedure for determining the remuneration of executive management that aligns with the long-term interests of the Company and the Company's strategy. This policy shall be presented, subject for approval, to the GMS in line with legal requirements.	C.2., 1	The Board should determine the annual remuneration of the executive management, based on the recommendations of the Nomination and Remuneration Committee and in accordance with the Company's remuneration policy. The remuneration policy should be prepared in accordance with the relevant legal requirements.	X		
C: PERFORMANCE, MOTIVATION AND REWARD	C.2. The Board shall ensure there is a formal and transparent policy and procedure for determining the remuneration of executive management that aligns with the long-term interests of the Company and the Company's strategy. This policy shall be presented, subject for approval, to the GMS in line with legal requirements.	C.2., 2	Levels of remuneration for executive management members and key performance indicators taken into account when determining variable (performance-based) part of the remuneration should be set in advance and be measurable and appropriate in relation to the agreed strategy and risk appetite, the economic environment within which the Company operates, and the pay and conditions of employees within the Company. In particular, they should include indicators related to non-financial performance and appropriate sustainability objectives.	X		
C: PERFORMANCE, MOTIVATION AND REWARD	C.2. The Board shall ensure there is a formal and transparent policy and procedure for determining the remuneration of executive management that aligns with the long-term interests of the Company and the Company's strategy. This policy shall be presented, subject for approval, to the GMS in line with legal requirements.	C.2., 3	Company's shares and/or share purchase options should represent a significant part (e.g., not less than 10%) of the executive management member's total variable remuneration.	X		
D: DISCLOSURE AND INVESTOR RELATIONS						
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 1	The Company should make sure to provide accurate, complete and timely financial and operational information, including quarterly, half-yearly and annual reports, as well as current reports. Companies should ensure all relevant information is easily accessible to investors, including through the Company website and other public information sources, as the case may be.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 2	The Company is recommended to have an Investor Relations (IR) function and should appoint a dedicated person in charge of IR function. The contact details of the person or persons charged of the IR function shall be available on the Company's website. The IR function will report directly to the CEO/CFO, underscoring its significance within the Company's hierarchy and emphasizing its central role in managing and communicating the Company's capital market engagements and status. The Company should organise induction and regular training/courses, if needed, for the IR function, tailored to its specific needs and responsibilities.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The Company should include on its corporate website a dedicated Investor Relations section, with all relevant information of interest for investors, available both in Romanian and English.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •Main corporate regulations: updated articles of association, GMS procedures, board's internal regulation and board committees' internal regulations.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •List of current members of the Board, Board's Committees and executive management, providing an up-to-date information on independence status , professional CVs (containing at least: name, surname, gender, nationality, age; work experience by year, position and Company; studies, field of study and academic or professional institution granting the diploma), other professional commitments, including executive and non-executive Board positions in companies, not-for-profit institutions and state institutions; relationship with shareholders holding at least 5% of the voting rights/shares issued by the Company; the duration of the appointment of the members of the Board, the Committees and the executive management, specifying the date from which they were appointed.	X		

D: DISCLOSURE AND INVESTOR RELATIONS	D.1 The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •Current reports and periodic reports (quarterly, semi-annual and annual reports).	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •Information related to GMS: the agenda, supporting materials and the decisions taken; procedure for running the GMS; the Nomination Policy; candidates' professional CVs (containing at least: name, surname, gender, nationality, age; work experience by year, position and Company; studies, field of study and academic or professional institution granting the diploma), as well as any other information presented at A.3.3; communication channel(s) for shareholders to address questions; answers to shareholders' questions related to the agenda; declarations of independence for board candidates and evaluations made by Nomination and Remuneration Committee/Board for candidates, including their compliance with independence criteria.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •Information on Board evaluation, made as per Provision A.5.7, including evaluation criteria and process, as well as a summary result of the evaluation and actions that have been or will be undertaken as a result of the evaluation.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •Information on corporate events, such as payment of dividends and other distributions to shareholders, or other events leading to the acquisition or limitation of rights of a shareholder, including the deadlines and principles applied to such operations. Such information should be published within a timeframe that enables investors to make investment decisions.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 3	The company should include on its Investor Relations section: •Corporate policies, among which code of conduct, dividend policy, remuneration policy, forecast policy, policy for communication with investors, the corporate social responsibility (CSR)/sponsorship policy, policy for related parties' transactions, policy for diversity, equity and inclusion, and whistleblowing policy (if not already part of the Code of Conduct).	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 4	The Company should organise at least two meetings/conference calls with analysts and investors each year. The information presented on these occasions should be published in the IR section of the Company website at the time of the meetings/conference calls.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. The Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 5	The Company should disclose the material and reportable non-financial and sustainability issues with emphasis on the disclosure of environmental, social and governance (ESG) issues of its business and operations in line with the recognized standard of sustainability reporting. The Company's sustainability statements shall be disclosed on its website.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.1. he Company should ensure adequate communications with shareholders, investors, regulators and other stakeholders and establish adequate systems for financial and sustainability reporting.	D.1., 6	The Company should have a CSR/sponsorship policy to guide the activity in the area of supporting CSR activities and sponsorship.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.2. The Company should ensure fair and equitable treatment of all its shareholders, as well as availability of all needed tools and information to allow shareholders to exercise their rights in relation to the Company.	D.2., 1	The Company should have a dividend policy as a set of directions the Company intends to follow regarding the distribution of net profit.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.2. The Company should ensure fair and equitable treatment of all its shareholders, as well as availability of all needed tools and information to allow shareholders to exercise their rights in relation to the Company.	D.2., 2	The procedure for running the GMS should not restrict the participation of shareholders in GMS and the exercise of their rights. Amendments of the procedure for running the GMS should take effect, at the earliest, as of the next GMS.	X		

D: DISCLOSURE AND INVESTOR RELATIONS	D.2. The Company should ensure fair and equitable treatment of all its shareholders, as well as availability of all needed tools and information to allow shareholders to exercise their rights in relation to the Company.	D.2., 3	The external auditors should attend the shareholders' meetings where their reports are presented, in order to respond to shareholders' questions.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.2. The Company should ensure fair and equitable treatment of all its shareholders, as well as availability of all needed tools and information to allow shareholders to exercise their rights in relation to the Company.	D.2., 4	The Board should present to the annual GMS a summary of the assessment of the adequacy and effectiveness of the risk management and internal control framework, as per the related information included in the annual report.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.2. The Company should ensure fair and equitable treatment of all its shareholders, as well as availability of all needed tools and information to allow shareholders to exercise their rights in relation to the Company.	D.2., 5	The Company should stimulate engagement with shareholders and investors by: •Encouraging active shareholder participation in GMS, like ensuring conditions for virtual participation. •Holding regular briefings and updates for investors, especially during significant corporate events. •Establishing channels for shareholders to provide feedback and ask questions, ensuring responses are timely and comprehensive.	X		
D: DISCLOSURE AND INVESTOR RELATIONS	D.2. The Company should ensure fair and equitable treatment of all its shareholders, as well as availability of all needed tools and information to allow shareholders to exercise their rights in relation to the Company.	D.2., 6	Any professional, consultant, expert or financial analyst may participate in the shareholders' meeting upon prior invitation from the Chairperson of the Board. Accredited journalists may also participate in the GMS, unless the Chairperson decides otherwise.	X		
E: SUSTAINABILITY AND STAKEHOLDERS						
E: SUSTAINABILITY AND STAKEHOLDERS	E.1. The Company should integrate sustainability aspects in its strategy and mitigate any material negative environmental and social impacts of its operations, to the possible extent.	E.1., 1	The Board should ensure that sustainability, environmental and social considerations are integrated in the Company's strategy and operations, risk management and remuneration practices and shall oversee this integration. A specialised sustainability committee or one of the standing committees of the Board shall assist the Board with these tasks.	X		
E: SUSTAINABILITY AND STAKEHOLDERS	E.1. The Company should integrate sustainability aspects in its strategy and mitigate any material negative environmental and social impacts of its operations, to the possible extent.	E.1., 2	The Board should ensure that Company's operations run according to the national and international E&S standards and Company's E&S policies are consistent with its long-term objectives. In particular, the Company shall have internal acts relating to its responsibilities for environmental and social issues and policies and procedures that enable it to identify material factors and assess the impact on the Company's activities.	X		
E: SUSTAINABILITY AND STAKEHOLDERS	E.1. The Company should integrate sustainability aspects in its strategy and mitigate any material negative environmental and social impacts of its operations, to the possible extent.	E.1., 3	Whenever a decision to be approved by the Board has potential material and negative E&S impact, the Board should receive from the executive management (i) an analysis on how this decision is aligned with the Company's sustainability objectives and E&S policies or (ii) proposal of the measures to mitigate negative E&S impacts.	X		
E: SUSTAINABILITY AND STAKEHOLDERS	E.2 The Company should have in place a process for identifying the stakeholders affected by Company's operations. The Board should take into consideration stakeholders' interests and ensure there is active communication between the Company and its stakeholders.	E.2., 1	The Board should ensure that there is a formal stakeholder identification process for Company's stakeholders including investors, creditors, clients, employees and suppliers, as well as targeted approaches for engaging with its priority stakeholders.	X		
E: SUSTAINABILITY AND STAKEHOLDERS	E.3. The Board should adopt a Code of Conduct with adequate scope including guiding principles which reflect the Company's commitment to ethics, integrity and quality of performance.	E.3., 1	The Board should develop a purpose statement and a vision statement as well as articulate Company's values, so the entire organisation understands the Company's strategic direction.	X		
E: SUSTAINABILITY AND STAKEHOLDERS	E.3. he Board should adopt a Code of Conduct with adequate scope including guiding principles which reflect the Company's commitment to ethics, integrity and quality of performance.	E.3., 2	The Board should adopt a Code of Conduct for Board members, executive management and Company employees, with clear provisions aimed at preventing and sanctioning fraud and bribery. The Board should not permit any waiver of any ethics requirement by any director, executive manager or employee.	X		

	E: SUSTAINABILITY AND STAKEHOLDERS	E.3. The Board should adopt a Code of Conduct with adequate scope including guiding principles which reflect the Company's commitment to ethics, integrity and quality of performance.	E.3., 3	The Board should ensure that the Code of Conduct policies are integrated into Company's practices and incorporated into the onboarding process for new hires. The Board should ensure the efficient implementation and monitoring of compliance with the Code of Conduct and periodically review it.	X		

Banca Transilvania S.A.
LEI CODE: 549300RG3H390KEL8896

CONSOLIDATED AND SEPARATE FINANCIAL STATEMENTS

**Prepared in accordance with the
International Financial Reporting Standards as adopted by the
European Union**

For the year ended December 31, 2025

Banca Transilvania S.A.

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Consolidated and Separate Statement of Profit or Loss

For the year ended December 31

	Notes	Group		Bank	
		2025 RON thousand	2024 RON thousand	2025 RON thousand	2024 RON thousand
Interest income calculated using the effective interest method		12,152,570	10,692,264	11,104,418	9,610,503
Other similar interest income		615,060	551,024	-	-
Interest expense calculated using the effective interest method		(4,686,401)	(4,323,349)	(4,457,657)	(4,063,526)
Other similar interest expense		(15,680)	(12,177)	(15,610)	(14,782)
Net interest income	8	8,065,549	6,907,762	6,631,151	5,532,195
Fee and commission income		2,841,437	2,515,108	2,453,028	2,116,593
Fee and commission expense		(1,218,504)	(1,027,277)	(1,064,706)	(848,314)
Net fee and commission income	9	1,622,933	1,487,831	1,388,322	1,268,279
Net trading income	10	1,227,449	938,291	894,117	707,487
Net gain / (loss) from financial assets measured at fair value through other items of comprehensive income	11	67,103	167,273	66,426	164,342
Net gain / (loss) from financial assets mandatorily measured at fair value through profit or loss	12	247,962	158,664	434,267	282,298
Contribution to the Bank Deposit Guarantee Fund and to the Resolution Fund	13	(114,465)	(90,643)	(102,453)	(74,514)
Other operating income	14	544,016	492,221	473,777	343,777
Operating income		11,660,547	10,061,399	9,785,607	8,223,864
Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss	15(a)	(819,958)	(657,097)	(615,015)	(436,106)
(Other) Provisions and reversal of provisions	15(b)	(11,700)	81,793	(7,231)	103,934
Personnel expenses	16	(2,702,604)	(2,599,594)	(2,162,509)	(1,945,345)
Depreciation and amortization		(558,376)	(516,700)	(453,357)	(419,469)
Other operating expenses, of which:	17	(2,179,680)	(1,743,097)	(1,728,052)	(1,366,885)
Additional tax on bank income		(491,387)	(283,759)	(487,176)	(269,484)
Operating expenses		(6,272,318)	(5,434,695)	(4,966,164)	(4,063,871)
Bargain gain	45	121,393	815,665	-	-
Profit before income tax		5,509,622	5,442,369	4,819,443	4,159,993
Income tax expense (-)	18	(848,901)	(711,845)	(724,153)	(628,315)
Net profit for the year		4,660,721	4,730,524	4,095,290	3,531,678
Net Profit of the Group attributable to:					
Equity holders of the Bank		4,478,867	4,554,834	-	-
Non-controlling interests		181,854	175,690	-	-
Net Profit for the year		4,660,721	4,730,524	4,095,290	3,531,678
Basic earnings per share	42	4.1119	4.1809	-	-
Diluted earnings per share	42	4.1119	4.1809	-	-

Banca Transilvania S.A.

Consolidated and Separate Statement of Comprehensive Income

For the year ended December 31

		Group		Bank	
	Notes	2025 RON thousand	2024 RON thousand	2025 RON thousand	2024 RON thousand
Net Profit for the year		4,660,721	4,730,524	4,095,290	3,531,678
Items that will not be reclassified to profit or loss, net of tax		6,045	9,056	6,090	9,052
Increase from property and equipment and intangible assets revaluation		8,107	8,555	8,107	8,555
Other items of comprehensive income		(765)	1,870	(720)	1,866
Tax related to items that will not be reclassified to profit or loss		(1,297)	(1,369)	(1,297)	(1,369)
Items which are or may be reclassified to profit or loss		1,051,061	(170,161)	972,811	(178,689)
<i>Fair value reserve (financial assets measured at fair value through other items of comprehensive income), of which:</i>		1,261,126	(210,192)	1,171,475	(218,421)
Net gain / loss (-) from disposal of financial assets measured at fair value through other items of comprehensive income, transferred to profit or loss account		(67,103)	(167,273)	(66,426)	(164,342)
Fair value changes of financial assets measured at fair value through other items of comprehensive income		1,328,229	(42,919)	1,237,901	(54,079)
Translation of financial information of foreign operations to presentation currency		2,112	1,650	(1,313)	19
Income tax on items which are or may be reclassified to profit or loss		(212,177)	38,381	(197,351)	39,713
Total comprehensive income for the period		5,717,827	4,569,419	5,074,191	3,362,041
Total comprehensive income attributable to:					
Equity holders of the Bank		5,535,973	4,393,729	-	-
Non-controlling interests	1	181,854	175,690	-	-
Total comprehensive income for the period		5,717,827	4,569,419	5,074,191	3,362,041

The financial statements were approved by the Board of Directors on March 24, 2026 and were signed on its behalf by:

Horia Ciorcilă
Chairman

George Călinescu
Deputy CEO - CFO

Banca Transilvania S.A.

Consolidated and Separate Statement of Financial Position

At December 31

	Notes	Group		Bank	
		2025 RON thousand	2024 RON thousand	2025 RON thousand	2024 RON thousand
Assets					
Cash and current accounts with Central Banks	19	25,499,275	21,950,170	23,224,311	16,908,360
Derivatives	43	145,824	173,030	150,642	155,572
Financial assets held for trading	21	591,855	389,817	22,330	17,833
Financial assets which are required to be measured at fair value through profit or loss	21	1,904,620	1,469,014	2,645,584	2,015,434
Financial assets measured at fair value through other items of comprehensive income	24	34,625,744	43,977,335	33,850,743	43,151,498
- of which pledged securities (repo agreements)		1,161,753	162,603	1,161,753	162,603
Financial assets at amortized cost - of which:		150,957,919	129,222,934	145,864,742	116,391,887
- Placements with banks and public institutions	20	16,552,294	13,714,870	14,476,281	13,612,057
- of which pledged placements		98,013	-	-	-
- Loans and advances to customers	22	100,446,007	90,779,626	99,691,081	81,389,989
- Debt instruments	24	31,939,806	22,401,071	29,871,314	19,376,763
- of which pledged debt instruments (repo agreements)		1,199,101	38,872	834,792	-
- Other financial assets	30	2,019,812	2,327,367	1,826,066	2,013,078
Finance lease receivables	23	6,263,899	5,590,236	-	-
Investments in subsidiaries	25	28,871	23,315	1,373,464	2,644,703
Property and equipment and investment property	26	1,711,134	1,655,373	1,227,878	829,734
Intangible assets	27	1,268,602	973,222	1,013,652	747,305
Goodwill	27	156,979	156,915	-	-
Right-of-use assets	28	589,203	586,634	559,701	769,195
Current tax receivables		-	-	-	-
Deferred tax assets	29	223,530	462,239	188,176	388,277
Other non-financial assets	31	446,242	405,244	276,887	244,114
Total assets		224,413,697	207,035,478	210,398,110	184,263,912

Banca Transilvania S.A.

Consolidated and Separate Statement of Financial Position

At December 31

	Notes	Group		Bank	
		2025 RON thousand	2024 RON thousand	2025 RON thousand	2024 RON thousand
Liabilities					
Derivatives	43	261,867	235,322	263,550	235,283
Deposits from banks	32	301,847	951,155	321,053	1,173,778
Deposits from customers	33	175,249,810	167,869,266	168,861,727	150,785,254
Loans from banks and other financial institutions	34	17,122,801	12,237,716	14,604,339	11,209,491
Subordinated liabilities	35	2,643,277	2,530,535	2,466,250	2,405,137
Lease liabilities	28	624,366	617,498	595,633	747,857
Other financial liabilities	37	3,446,704	3,767,710	2,084,359	2,582,891
Current tax liability		103,203	215,042	74,933	184,341
Provisions for other risks and loan commitments	36	837,123	827,438	639,545	500,112
Other non-financial liabilities	38	475,283	312,973	394,696	220,663
Total liabilities excluding financial liabilities to holders of fund units		201,066,281	189,564,655	190,306,085	170,044,807
Financial liabilities to holders of fund units		49,625	34,250	-	-
Total liabilities		201,115,906	189,598,905	190,306,085	170,044,807
Equity					
Share capital	39	10,989,724	9,255,300	10,989,724	9,255,300
Treasury shares		(26,511)	(39,528)	-	(24,241)
Share premiums		28,110	32,033	28,614	28,614
Additional equity instruments	39	2,530,759	-	2,529,996	-
Retained earnings		7,837,042	7,616,536	5,643,769	5,281,983
Revaluation reserves from tangible and intangible assets		46,248	44,426	31,511	31,369
Reserves on financial assets measured at fair value through other items of comprehensive income		(610,733)	(1,659,839)	(703,028)	(1,676,942)
Other reserves		1,615,420	1,368,612	1,571,439	1,323,022
Total equity attributable to equity holders of the Bank		22,410,059	16,617,540	20,092,025	14,219,105
Non-controlling interest	1	887,732	819,033	-	-
Total equity		23,297,791	17,436,573	20,092,025	14,219,105
Total liabilities and equity		224,413,697	207,035,478	210,398,110	184,263,912

The financial statements were approved by the Board of Directors on March 24, 2026 and were signed on its behalf by:

Horia Ciorcilă
Chairman

George Călinescu
Deputy CEO - CFO

Banca Transilvania S.A.

Consolidated Statement of Changes in Equity

For the year ended December 31

Group

Attributable to the equity holders of the Bank

	Share capital	Treasury shares	Share premiums	Additional equity instruments (**)	Revaluation reserves	Reserves from financial assets measured at fair value through other items of comprehensive income	Other reserves	Retained earnings	Total attributable to the equity holders of the Bank	Non-controlling interest	Total
<i>In RON thousand</i>											
Balance as at January 1, 2025	9,255,300	(39,528)	32,033	-	44,426	(1,659,839)	1,368,612	7,616,536	16,617,540	819,033	17,436,573
Profit for the year	-	-	-	-	-	-	-	4,478,867	4,478,867	181,854	4,660,721
Profit/(Loss) from fair value changes of financial assets measured at fair value through other items of comprehensive income, net of deferred tax	-	-	-	-	-	1,049,106	-	-	1,049,106	-	1,049,106
Revaluation of property and equipment, intangible assets, net of tax	-	-	-	-	6,810	-	-	-	6,810	-	6,810
Retained earnings from revaluation reserves	-	-	-	-	(4,988)	-	-	4,988	-	-	-
Foreign currency translation of foreign operations	-	-	-	-	-	-	-	1,955	1,955	-	1,955
Other items of comprehensive income, net of tax	-	-	-	-	-	-	-	(765)	(765)	-	(765)
Total comprehensive income for the period	-	-	-	-	1,822	1,049,106	-	4,485,045	5,535,973	181,854	5,717,827
Contributions of/distributions to the shareholders											
Increase in share capital through the conversion of retained earnings	1,734,424	-	-	-	-	-	-	(1,734,424)	-	-	-
Capital increases from other capital instruments	-	-	-	2,530,759	-	-	-	-	2,530,759	-	2,530,759
Distribution to statutory reserves	-	-	-	-	-	-	241,182	(241,182)	-	-	-
Acquisition of treasury shares	-	(157,632)	-	-	-	-	-	-	(157,632)	-	(157,632)
Payments of treasury shares	-	170,649	-	-	-	-	-	(181,011)	(10,362)	-	(10,362)
Dividends distributed to shareholders (*)	-	-	-	-	-	-	-	(2,289,255)	(2,289,255)	(41,604)	(2,330,859)
SOP 2024 Scheme	-	-	-	-	-	-	-	134,817	134,817	-	134,817
Transfer of retained earnings to liabilities to holders of fund units	-	-	-	-	-	-	-	15,375	15,375	-	15,375
Other items	-	-	(3,923)	-	-	-	5,626	31,141	32,844	(71,551)	(38,707)
Total contributions of/distributions to the shareholders	1,734,424	13,017	(3,923)	2,530,759	-	-	246,808	(4,264,539)	256,546	(113,155)	143,391
Balance at December 31, 2025	10,989,724	(26,511)	28,110	2,530,759	46,248	(610,733)	1,615,420	7,837,042	22,410,059	887,732	23,297,791

(*) The gross dividend per share approved by the Bank's Board of Directors and paid RON 1.7333 in June for a reference share capital (share capital registered at the Trade Register) of 916,879,846 shares, and RON 0.6420 paid in November, for a reference share capital (share capital registered at the Trade Register) of 1,090,322,225 shares.

(**) Capital increase includes AT1 instruments issued, described in Note 39.

Banca Transilvania S.A.

Consolidated Statement of Changes in Equity

For the year ended December 31

Group

In RON thousand	Attributable to the equity holders of the Bank									
	Share capital	Treasury shares	Share premiums	Revaluation reserves	Reserves from financial assets measured at fair value through other items of comprehensive income	Other reserves	Retained earnings	Total attributable to the equity holders of the Bank	Non-controlling interest	Total
Balance as at January 1, 2024	8,073,083	(28,269)	31,235	43,839	(1,488,214)	1,147,889	5,444,429	13,223,992	672,516	13,896,508
Profit for the year	-	-	-	-	-	-	4,554,834	4,554,834	175,690	4,730,524
Profit/(Loss) from fair value changes of financial assets measured at fair value through other items of comprehensive income, net of deferred tax	-	-	-	-	(171,625)	-	-	(171,625)	-	(171,625)
Revaluation of property and equipment, intangible assets, net of tax	-	-	-	7,186	-	-	-	7,186	-	7,186
Retained earnings from revaluation reserves	-	-	-	(6,599)	-	-	6,599	-	-	-
Foreign currency translation of foreign operations	-	-	-	-	-	-	1,464	1,464	-	1,464
Other items of comprehensive income, net of tax	-	-	-	-	-	-	1,870	1,870	-	1,870
Total comprehensive income for the period	-	-	-	587	(171,625)	-	4,564,767	4,393,729	175,690	4,569,419
Contributions of/distributions to the shareholders										
Increase in share capital through the conversion of retained earnings	1,182,217	-	-	-	-	-	(1,182,217)	-	-	-
Distribution to statutory reserves	-	-	-	-	-	207,999	(207,999)	-	-	-
Acquisition of treasury shares	-	(130,447)	-	-	-	-	-	(130,447)	-	(130,447)
Payments of treasury shares	-	119,188	-	-	-	-	(138,027)	(18,839)	-	(18,839)
Dividends distributed to shareholders (*)	-	-	-	-	-	-	(1,000,000)	(1,000,000)	(12,990)	(1,012,990)
SOP 2023 Scheme	-	-	-	-	-	-	176,984	176,984	-	176,984
Transfer of retained earnings to liabilities to holders of fund units	-	-	-	-	-	-	4,749	4,749	-	4,749
Other items	-	-	798	-	-	12,724	(46,150)	(32,628)	(16,183)	(48,811)
Total contributions of/distributions to the shareholders	1,182,217	(11,259)	798	-	-	220,723	(2,392,660)	(1,000,181)	(29,173)	(1,029,354)
Balance at December 31, 2024	9,255,300	(39,528)	32,033	44,426	(1,659,839)	1,368,612	7,616,536	16,617,540	819,033	17,436,573

(*) The gross dividend per share approved by the Bank's Board of Directors and paid is RON 1.2521, for a reference share capital (share capital registered at the Trade Register) of 916,879,846 shares.

Banca Transilvania S.A.

Separate Statement of Changes in Equity

For the year ended December 31

Bank Attributable to the equity holders of the Bank

<i>In RON thousand</i>	Share capital	Treasury shares	Share premiums	Additional equity instruments (**)	Revaluation reserves	Reserves from financial assets measured at fair value through other items of comprehensive income	Other reserves	Retained earnings	Total
Balance as at January 1, 2025	9,255,300	(24,241)	28,614	-	31,369	(1,676,942)	1,323,022	5,281,983	14,219,105
Profit for the year	-	-	-	-	-	-	-	4,095,290	4,095,290
Profit/(Loss) from fair value changes of financial assets measured at fair value through other items of comprehensive income, net of deferred tax	-	-	-	-	-	973,914	-	-	973,914
Revaluation of property and equipment, intangible assets, net of tax	-	-	-	-	6,810	-	-	-	6,810
Retained earnings from revaluation reserves	-	-	-	-	(6,668)	-	-	6,668	-
Other items of comprehensive income, net of tax	-	-	-	-	-	-	-	(1,823)	(1,823)
Total comprehensive income for the period	-	-	-	-	142	973,914	-	4,100,135	5,074,191
Contributions of/distributions to the shareholders									
Increase in share capital through the conversion of retained earnings	1,734,424	-	-	-	-	-	-	(1,734,424)	-
Distribution to statutory reserves	-	-	-	-	-	-	241,182	(241,182)	-
Acquisition of treasury shares	-	(146,408)	-	-	-	-	-	-	(146,408)
Payments of treasury shares to the employees	-	170,649	-	-	-	-	-	(181,011)	(10,362)
Issue of Additional equity instruments	-	-	-	2,529,996	-	-	-	-	2,529,996
Dividends distributed to shareholders (*)	-	-	-	-	-	-	-	(2,289,255)	(2,289,255)
SOP 2024 Scheme	-	-	-	-	-	-	-	134,817	134,817
Other items (***)	-	-	-	-	-	-	7,235	572,706	579,941
Total contributions of/distributions to the shareholders	1,734,424	24,241	-	2,529,996	-	-	248,417	(3,738,349)	798,729
Balance at December 31, 2025	10,989,724	-	28,614	2,529,996	31,511	(703,028)	1,571,439	5,643,769	20,092,025

(*) The gross dividend per share approved by the Bank's Board of Directors and paid is RON 1.7333 in June for a reference share capital (share capital registered at the Trade Register) of 916,879,846 shares, and RON 0.6420 paid in November, for a reference share capital (share capital registered at the Trade Register) of 1,090,322,225 shares.

(**) Capital increase includes AT1 instruments issued, described in Note 39.

(***) Includes the effect of the merger of OTP Bank Romania S.A. and BT Building S.R.L. (see note 45).

Banca Transilvania S.A.

Separate Statement of Changes in Equity

For the year ended December 31

Bank

Attributable to the equity holders of the Bank

<i>In RON thousand</i>	Share capital	Treasury shares	Share premiums	Revaluation reserves	Reserves from financial assets measured at fair value through other items of comprehensive income	Other reserves	Retained earnings	Total
Balance as at January 1, 2024	8,073,083	(12,982)	28,614	28,738	(1,498,237)	1,115,023	4,095,127	11,829,366
Profit for the year	-	-	-	-	-	-	3,531,678	3,531,678
Profit/(Loss) from fair value changes of financial assets measured at fair value through other items of comprehensive income, net of deferred tax	-	-	-	-	(178,705)	-	-	(178,705)
Revaluation of property and equipment, intangible assets, net of tax	-	-	-	7,186	-	-	-	7,186
Retained earnings from revaluation reserves	-	-	-	(4,555)	-	-	4,555	-
Other items of comprehensive income, net of tax	-	-	-	-	-	-	1,882	1,882
Total comprehensive income for the period	-	-	-	2,631	(178,705)	-	3,538,115	3,362,041
Contributions of/distributions to the shareholders								
Increase in share capital through the conversion of retained earnings	1,182,217	-	-	-	-	-	(1,182,217)	-
Distribution to statutory reserves	-	-	-	-	-	207,999	(207,999)	-
Acquisition of treasury shares	-	(130,447)	-	-	-	-	-	(130,447)
Payments of treasury shares to the employees	-	119,188	-	-	-	-	(138,027)	(18,839)
Dividends distributed to shareholders (*)	-	-	-	-	-	-	(1,000,000)	(1,000,000)
SOP 2023 Scheme	-	-	-	-	-	-	176,984	176,984
Other items	-	-	-	-	-	-	-	-
Total contributions of/distributions to the shareholders	1,182,217	(11,259)	-	-	-	207,999	(2,351,259)	(972,302)
Balance at December 31, 2024	9,255,300	(24,241)	28,614	31,369	(1,676,942)	1,323,022	5,281,983	14,219,105

(*) The gross dividend per share approved by the Bank's Board of Directors and paid is RON 1.2521, for a reference share capital (share capital registered at the Trade Register) of 916,879,846 shares.

Banca Transilvania S.A.

Consolidated and Separate Statement of Cash Flows

For the year ended December 31

<i>In RON thousand</i>		Group		Bank	
	Notes	2025	2024	2025	2024
Cash-flow from operating activities					
Profit for the year		4,660,721	4,730,524	4,095,290	3,531,678
Adjustments for:					
Depreciation and amortization	26,27,28	558,376	516,700	453,357	419,469
Impairment allowance, expected losses and write-offs of financial assets, provisions for other risks and loan commitments		1,042,635	856,148	814,292	479,056
Adjustment of financial assets at fair value through profit or loss		(247,962)	(158,664)	(434,267)	(282,298)
Income tax expense	18	848,901	711,845	724,153	628,315
Interest income	8	(12,767,630)	(11,243,288)	(11,104,418)	(9,610,503)
Interest expense	8	4,702,081	4,335,526	4,473,267	4,078,308
Bargain gain	45	(121,393)	(815,665)	-	-
Other adjustments		490,479	268,609	(294,304)	166,538
Net profit adjusted with non-monetary elements		(833,792)	(798,265)	(1,272,630)	(589,437)
Changes in operating assets and liabilities(*)					
Change in financial assets at amortized cost and placements with banks		(3,273,065)	(16,692,671)	(6,010,326)	(11,300,078)
Change in loans and advances to customers		(8,688,961)	(6,643,992)	(8,586,808)	(10,108,407)
Change in finance lease receivables		(733,375)	(1,171,993)	-	-
Change in financial assets at fair value through profit or loss		(187,644)	(28,264)	(146,331)	(62,981)
Change in financial assets held for trading and measured at fair value through profit or loss - derivatives		27,430	(45,043)	7,329	(30,755)
Change in equity instruments		(134,072)	(33,019)	(4,497)	18,470
Changes in debt instruments		(67,966)	(11,042)	-	-
Change in other financial assets		360,868	(210,367)	2,231,205	(216,748)
Change in other assets		(197,526)	(115,007)	(102,095)	(126,175)
Change in deposits from customers		7,426,812	16,239,023	7,651,595	16,301,847
Change in deposits from banks		(649,203)	(390,618)	(852,527)	92,406
Change in financial liabilities held-for-trading		26,504	141,831	27,162	146,474
Change in repo operations		2,007,343	(161,489)	1,684,783	(200,129)
Change in other financial liabilities		(432,791)	1,018,082	(650,805)	684,225
Change in other liabilities		(222,096)	(186,266)	(268,354)	(94,048)
Income tax (paid)/recovered		(966,225)	(645,110)	(844,935)	(569,906)
Interest received		10,348,995	9,182,039	8,797,075	7,580,020
Interest paid		(3,670,841)	(3,406,598)	(3,455,397)	(3,265,336)
Net cash-flow from/ (used in) operating activities		140,395	(3,958,769)	(1,795,556)	(1,740,558)

(*) Changes in operating assets and liabilities only include the effect of net treasury flows, the non-monetary effect of the mergers being eliminated.

Banca Transilvania S.A.

Consolidated and Separate Statement of Cash Flows

For the year ended December 31

<i>In RON thousand</i>		Group		Bank	
	Notes	2025	2024	2025	2024
Cash-flow used in investment activities					
Acquisition of financial assets measured at fair value through other items of comprehensive income	24	(6,342,085)	(22,807,911)	(6,216,492)	(22,008,977)
Sale/redemption of financial assets measured at fair value through other items of comprehensive income	24	16,992,173	19,733,896	16,874,810	19,066,532
Acquisitions of property and equipment		(254,703)	(213,419)	(219,750)	(201,581)
Acquisitions of intangible assets		(450,437)	(370,479)	(366,176)	(290,527)
Proceeds from disposal of property and equipment		19,098	3,649	12,155	3,703
Acquisition of subsidiaries net of cash acquired through business combinations (**)	45	(306,184)	2,916,998	(469,305)	(1,768,144)
Proceeds from sale of equity investments		5,414	-	-	-
Dividends collected	14	18,929	15,668	77,352	23,572
Coupon collected, at term, during the year of debt instruments	24	1,911,602	1,560,746	1,881,891	1,553,070
Net cash-flow from/ (used in) investment activities		11,593,807	839,148	11,574,485	(3,622,352)
Cash-flow from financing activities					
Capital increases (***)		2,530,759	-	2,529,996	-
Gross proceeds from loans from banks and other financial institutions	44	1,866,582	4,055,962	1,500,000	3,481,870
Gross payments from loans from banks and other financial institutions	44	(835,658)	(4,454,017)	(150,013)	(674,446)
Gross receipts from subordinated debts from banks and financial institutions	44	50,702	-	-	-
Gross payments from subordinated loans from banks and other financial institutions	44	-	(16,155)	-	-
Repayment of principal lease liabilities	28	(174,235)	(177,010)	(160,958)	(173,447)
Dividend payments		(2,109,859)	(936,184)	(2,070,528)	(924,001)
Payments for treasury shares		(157,632)	(130,447)	(146,408)	(130,447)
Interest paid		(995,630)	(796,256)	(919,597)	(756,297)
Net cash-flow from / (used in) financing activities		175,029	(2,454,107)	582,492	823,232

(**) It refers to the acquisition of O.C.N. Microinvest S.R.L and BRD Societate de Administrare a Fondurilor de Pensii Private S.A. in 2025, as well as the acquisition of BCR Chisinau S.A., BTP Store Hub Turda S.R.L. and the entities from OTP Group in 2024. Please see note 45 Business Combinations.

(***) Capital increases include AT1 instruments issued, described in Note 39.

In RON thousand	Notes	Group		Bank	
		2025	2024	2025	2024
Cash and cash equivalents at January 1		30,548,643	36,122,371	28,210,616	32,750,294
The impact of exchange rate variations on cash and cash equivalents		158,294	114,601	167,330	116,645
Net increase/decrease (-) in cash and cash equivalents		11,750,937	(5,688,329)	10,194,091	(4,656,323)
Cash and cash equivalents as at December 31	19	42,457,874	30,548,643	38,572,037	28,210,616

Notes to the consolidated and separate financial statements

1. Reporting entity

Banca Transilvania S.A.

Banca Transilvania S.A. (the “Parent company”, “The Bank”) is a joint-stock company incorporated in Romania. The Bank started its activity as a banking institution in 1993 and is licensed by the National Bank of Romania (“BNR”, the “Central Bank”) to conduct banking activities. The Bank started its activity in 1994 and its main operations involve banking services for legal entities and individuals. Banca Transilvania Group (the “Group”) includes the Parent company and its subsidiaries, based in Romania and in the Republic of Moldova. The consolidated and separate financial statements as at December 31, 2025 comprise the Parent company and its subsidiaries (hereinafter referred to as the “Group”).

The Group’s fields of activity are: banking through Banca Transilvania S.A., B.C. Victoriabank S.A. and Salt Bank S.A., leasing and consumer finance mainly through BT Leasing Transilvania IFN S.A., BT Direct IFN S.A., BT Microfinantare IFN S.A., BT Leasing MD S.R.L. and O.C.N. Microinvest S.R.L, asset management through BT Asset Management S.A.I. S.A. and INNO Investments S.A.I. S.A. (OTP Asset Management S.A.I. S.A.), brokerage and investments through BT Capital Partners S.A. and pension funds management BT Pensii S.A. and BRD Societate de Administrare a Fondurilor de Pensii Private S.A.. Additionally, the Bank also has control over two investment funds it consolidates.

As of October 2025, the Group has taken control of the entities O.C.N. Microinvest S.R.L. and Microinvest Technology S.R.L., through B.C. Victoriabank S.A.

Also in October 2025, the Bank established the company Secure Cash Express S.R.L., over which it has control. Also, starting with November 2025, the Bank and the Group acquired control over BRD Societate de Administrare a Fondurilor de Pensii Private S.A.

The Bank carries out its banking activity through its head office located in Cluj-Napoca and 42 branches, 475 agencies, 3 work units, 8 healthcare division units, 2 private banking agencies in Romania, 1 branch in Italy and 1 regional office located in Bucharest and 1 Head Office located in Bucharest (December 31, 2024: 1 Head Office located in Cluj-Napoca, 42 branches, 457 agencies, 3 work units, 8 healthcare division units, 2 private banking agencies in Romania, 1 branch in Italy and 1 regional office located in Bucharest, and 1 Head Office located in Bucharest).

The Group’s number of active employees as at December 31, 2025 was 13,361 (December 31, 2024: 13,629 employees).

The Bank’s number of active employees as at December 31, 2025 was 10,180 (December 31, 2024: 9,744 employees).

The registered address of the Bank is 30-36 Calea Dorobantilor, Cluj-Napoca, Romania.

The ownership structure of the Bank is presented below:

	2025	2024
NN Group (*)	9.37%	9.37%
The European Bank for Reconstruction and Development (“EBRD”)	5.16%	5.16%
Romanian individuals	25.15%	24.21%
Romanian companies	45.56%	45.20%
Foreign individuals	1.17%	1.11%
Foreign companies	13.59%	14.95%
Total	100%	100%

(*) NN Group N.V. and the pension funds managed by NN Pensii SAFAP S.A. and NN Asigurari de Viata S.A..

The Bank’s shares are listed on the Bucharest Stock Exchange and are traded under the symbol TLV.

Notes to the consolidated and separate financial statements

1. Reporting entity (*continued*)

The Group's subsidiaries are represented by the following entities:

Subsidiary	Field of activity	Percentage of direct and indirect stake December 31, 2025	Percentage of direct and indirect stake December 31, 2024
B.C. Victoriabank S.A.	Financial and banking activities and investments subject to license	44.63%	44.63%
BCR Chisinau S.A.	Financial and banking activities and investments subject to license	-	44.63%
BT Capital Partners S.A.	Investments	99.62%	99.62%
BT Leasing Transilvania IFN S.A.	Leasing	100%	100%
BT Investments S.R.L.	Investments	100%	100%
BT Direct IFN S.A.	Consumer loans	100%	100%
BT Building S.R.L.	Investments	-	100%
BT Asset Management SAI S.A.	Asset management	100%	100%
BT Solution Asistent in Brokeraj S.R.L.	Insurance broker	-	100%
BT Asiom Agent de Asigurare S.R.L.	Insurance broker	-	100%
BT Safe Agent de Asigurare S.R.L.	Insurance broker	-	100%
BT Intermedieri Agent de Asigurare S.R.L.	Insurance broker	-	100%
BT Leasing MD S.R.L.	Leasing	100%	100%
BT Microfinantare IFN S.A.	Other lending activities	100%	100%
Improvement Credit Collection S.R.L.	Activities of collection agents and Credit reporting bureaus	100%	100%
VB Investment Holding B.V.	Activities of holdings	61.82%	61.82%
BT Pensii S.A.	Activities of pension funds (except those in the public social security system)	100%	100%
Salt Bank S.A.	Financial and banking activities and investments subject to license	100%	100%
Avant Leasing IFN S.A.	Financial leasing	-	100%
BT Broker de Asigurare S.R.L.	Insurance broker	100%	100%
Code Crafters by BT S.R.L.	Custom software development activities	100%	100%
BTP One S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP Retail S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP Store Hub Turda S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
BTP Store Hub Oradea S.R.L.	Renting and subletting of own or rented real estate	99.73%	100%
OTP Bank Romania S.A.	Financial and banking activities	-	100%
Inter Terra S.R.L.	Buying and selling of own real estate	99.73%	100%
OTP Advisors S.R.L.	Other activities auxiliary to financial services, except insurance and pension funding	-	100%
OTP Factoring S.R.L.	Other financial intermediation	100%	100%
REA Project One Company S.R.L.	Real estate development	-	100%
GOVCKA Project Company S.R.L.	Real estate development	-	100%
OTP Consulting Romania S.R.L.	Other activities auxiliary to financial services, except insurance and pension funding	-	100%
INNO Investments S.A.I. S.A. (OTP Asset Management S.A.I. S.A.)	Asset management	100%	100%
O.C.N. Microinvest S.R.L.	Other lending activities	44.63%	-
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	Activities of pension funds (except those in the public social security system)	100%	-
Secure Cash Express S.R.L.	Investigation activities and private protection services	100%	-
Microinvest Technology S.R.L.	Custom software development activities	44.63%	-

Notes to the consolidated and separate financial statements

1. Reporting entity (*continued*)

Based on materially concept as defined in paragraph 7 of IAS 1, the Group has decided to exclude several subsidiaries from the consolidation perimeter, as their exclusion is not expected to have a significant effect on the consolidated financial statements. The decision to exclude them from consolidation is based on an assessment of both quantitative and qualitative factors, which included the size of the subsidiaries and their non-material impact on the Group as a whole.

As at December 31, 2025 the list of excluded subsidiaries from the consolidation perimeter and the reasons for their exclusion is shown below:

Subsidiary	reasons for exclusion
Code Crafters by BT S.R.L.	no significant assets or liabilities, expenses or revenues
BTP Retail S.R.L.	no significant assets or liabilities, expenses or revenues
BTP Store Hub Oradea S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Factoring S.R.L.	no significant assets or liabilities, expenses or revenues
Secure Cash Express SRL	no significant assets or liabilities, expenses or revenues
Microinvest Technology	no significant assets or liabilities, expenses or revenues
Sinteza (associate)	no significant assets or liabilities, expenses or revenues

As at December 31, 2024 the list of excluded subsidiaries from the consolidation perimeter and the reasons for their exclusion is shown below:

Subsidiary	reasons for exclusion
Code Crafters by BT S.R.L.	no significant assets or liabilities, expenses or revenues
Fond Alternativ BTP Retail S.R.L.	no significant assets or liabilities, expenses or revenues
BTP Store Hub Oradea S.R.L.	no significant assets or liabilities, expenses or revenues
BT Intermedieri Agent de Asigurare S.R.L.	no significant assets or liabilities, expenses or revenues
BT Asiom Agent de Asigurare S.R.L.	no significant assets or liabilities, expenses or revenues
BT Solution Asistent in Brokeraj S.R.L.	no significant assets or liabilities, expenses or revenues
BT Safe Agent de Asigurare S.R.L.	no significant assets or liabilities, expenses or revenues
REA Project One Company S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Factoring S.R.L.	no significant assets or liabilities, expenses or revenues
GOVCKA Project Company S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Advisors S.R.L.	no significant assets or liabilities, expenses or revenues
OTP Consulting Romania S.R.L.	no significant assets or liabilities, expenses or revenues
Sinteza (associate)	no significant assets or liabilities, expenses or revenues

In addition to the qualitative factors, namely nature of activity of excluded subsidiaries, future plans of the Group to centralize their activity in other bigger subsidiaries, the potential impact of the exclusion of subsidiaries on the consolidated financial statements is performed based on quantitative factors like assets, liabilities, net profit, expenses and revenues. The assessment is performed on an entity-by-entity base and an additional analysis is conducted on the potential impact of total excluded subsidiaries in total figures of the Group, as shown in the table below:

<i>RON thousand</i>	2025	2024
total assets of excluded subsidiaries	13,325	9,471
% of total assets of excluded subsidiaries in total assets of the Group	0.01%	0.01%
Total liabilities of excluded subsidiaries	18,179	16,315
% of total liabilities of excluded subsidiaries in total liabilities of the Group	0.01%	0.01%
P&L of excluded subsidiaries	7,451	4,857
% of total P&L of excluded subsidiaries in total P&L of the Group	0.16%	0.10%
Total expenses of excluded subsidiaries	101,454	56,391
% of total expenses of excluded subsidiaries in total expenses of the Group	0.06%	0.04%
Total revenues of excluded subsidiaries	108,905	61,248
% of total revenues of excluded subsidiaries in total revenues of the Group	0.07%	0.04%

The exclusion of these subsidiaries does not materially affect the Group's consolidated financial position, financial performance, cash flows or other elements of the consolidated financial statements. Given that these subsidiaries were deconsolidated starting from December 31, 2024, their expenses and revenues up to the date of deconsolidation are included in the consolidated statement of profit or loss of the Group.

Banca Transilvania S.A.

Notes to the consolidated and separate financial statements

1. Reporting entity (*continued*)

BT Leasing Transilvania IFN S.A.

BT Leasing Transilvania IFN S.A. operates through its head office located in Cluj-Napoca, 1 agency and 54 work units (2024: 1 agency and 43 work units) throughout the country. The company is authorized by the National Bank of Romania to provide leases for various types of vehicles production equipment and other equipment.

The number of active employees as at December 31, 2025 was 341 (2024: 326 employees).

The registered address of BT Leasing Transilvania IFN S.A. is Bd. 21 Decembrie 1989, Nr. 77, Clădire The Office, C-D, second floor and ground floor Cluj-Napoca, România.

BT Asset Management SAI S.A.

BT Asset Management SAI S.A. is an investment management company, member of Banca Transilvania Financial Group, authorized by the National Securities Commission (currently the Financial Supervisory Authority, also named „ASF”) through the decision No. 903/29.03.2005, ASF Public Register No. PJR05SAIR/120016 dated 29.03.2005.

BT Asset Management SAI S.A. manages both open and alternative investment funds. As at December 31, 2025, BT Asset Management SAI S.A. managed 16 investment funds, of which: 14 open funds and 2 alternative investment funds (2024: 17 investment funds, of which: 14 open funds and 3 alternative investment funds).

BT Asset Management SAI S.A. offers a full range of investment products, from fixed income funds, mixed funds and index funds, to equity and one real estate fund. The access to the capital market is provided to customers through investments in Romania, as well as in the EU countries (mainly Austria); placements can be made in RON, euro, american dollars and pounds. The number of active employees as at December 31, 2025 was 47 (2024: 42 employees). The company's registered address is in Cluj-Napoca, 22 Emil Racovita Street, 1st floor + garret, Cluj County, Romania.

BT Capital Partners S.A.

At the beginning of 2016, BT Securities S.A. – the brokerage company of Banca Transilvania Financial Group – became BT Capital Partners S.A., after taking over the investment banking activity of Capital Partners, the most important independent consulting Romanian company in the field of M&A and Corporate Finance, BT Capital Partners is also an exclusive member in Romania of Oaklins, the world's most important alliance of M&A professionals.

In its new formula, BT Capital Partners S.A. offers consulting services for raising funds via the capital market, consultancy on mergers and acquisitions, brokerage services, structuring of complex financing schemes, market research and strategic advisory.

At December 31, 2025 the company counted 66 active employees (2024: 59 employees). The company undertakes its activity through its headquarters located in Bulevardul 21 Decembrie 1989, nr. 77, The Office, Corpurile C-D, C, second floor, 400603 and through 9 work units.

BT Direct IFN S.A.

BT Direct IFN S.A. is authorized by the National Bank of Romania to carry out lending operations to individuals through credit cards as well as through consumer loans, having as object of activity the financing of natural persons.

BT Direct IFN S.A. and ERB Retail Services IFN S.A. have become the same company starting with August 1, 2019. Following the merger by absorption of BT Direct IFN S.A., ERB Retail Services IFN S.A. has become part of the Group keeping the name BT Direct IFN S.A..

As at December 31, 2025, the company has a registered office for the purpose of payroll taxes in Bucharest and another 122 offices in the locations of the main partners (2024: 127 offices).

The number of active employees at December 31, 2025 was 217 (2024: 205 employees). The company operates through its head office located in Cluj-Napoca, Bdul. 21 Decembrie 1989, Nr. 77, The Office, Cladirea C-D, ground floor.

Notes to the consolidated and separate financial statements

1. Reporting entity (*continued*)

BT Microfinantare IFN S.A.

BT Microfinantare IFN S.A. is a non-banking financial institution authorized by the National Bank of Romania established in 2016. The company's object of activity is financing small businesses. The company's registered address is Bucharest, Calea Serban Voda, nr. 206-218, Office U-Center. The number of active employees as at December 31, 2025 was 372 (2024: 308 employees). In 2025, BT Microfinantare IFN S.A. financed over 11,000 micro-enterprises (2024: 9,500 micro-enterprises) (loans for the support and development of current activities, procurement loans, loans for supplier payments, investment loans for existent and/or new work units, loans for the acquisition of machinery/equipment etc.). The outstanding balance for loans at the end of 2025 was RON 1,640.2 million (2024: RON 1,278.4 million).

B.C. Victoriabank S.A.

B.C. Victoriabank S.A. was founded on December 22, 1989, being the first commercial bank in the Republic of Moldova to be registered with the Central Bank of USSR on February 22, 1990, being reorganized on August 26, 1991 into a joint-stock company (joint-stock commercial bank).

On November 29, 2002, B.C. Victoriabank S.A. was re-registered as a commercial bank, open joint-stock company, and its shares were registered and listed on the Moldova Stock Exchange. B.C. Victoriabank S.A. is authorized to carry out banking activities pursuant to its license issued by the National Bank of Moldova. In 2018, Banca Transilvania S.A. became an indirect shareholder of B.C. Victoriabank S.A., holding together with EBRD 72.19% of the participation in this financial institution. At the beginning of 2018, Banca Transilvania S.A. purchased 61.82% of the shares of VB Investment Holding B.V., the remaining 38.18% being owned by the EBRD. Also in 2018, VB Investment Holding B.V. increased its investment to 72.19% in B.C. Victoriabank S.A., so that Banca Transilvania S.A.'s indirect effective holding in this financial institution became 44.63%. Banca Transilvania S.A. controls B.C. Victoriabank S.A. through VB Investment Holding B.V.. Starting from April 2018, Banca Transilvania S.A. appointed representatives in the management and in the Board of Directors of B.C. Victoriabank S.A., thus taking control of B.C. Victoriabank S.A..

B.C. Victoriabank S.A. carries out its activity through its headquarter located in Chisinau, August 31, 1989 Street No 141, and through 25 branches and 42 agencies throughout the Republic of Moldova (2024: 24 branches and 39 agencies). The number of active employees as at December 31, 2025 was 1,227 (2024: 1,116 employees). The share capital of B.C. Victoriabank S.A. consists of MDL 250,000,910, divided into 25,000,091 class I nominal ordinary shares, with voting rights, at a face value of MDL 10/share. The nominal ordinary shares issued by B.C. Victoriabank S.A. (ISIN: MD14VCTB1004) are admitted to trading on the regulated market at the Moldova Stock Exchange.

Salt Bank S.A.

Salt Bank is the first neobank developed entirely in Romania, a fully digital financial institution that aims to redefine the interaction between the customer and banking services. The digital bank was launched in March 2024 and is mainly aimed at the affluent segment and young professionals in urban areas, offering products and services exclusively through a modern and efficient mobile application.

With the mission of representing "a leap in banking and a leap in technology, for those who do not want to stay in their bank", Salt Bank aims to offer relevant financial solutions, built around an intuitive platform, competitive products and a high level of security for customer data and funds. All services are developed starting from three strategic pillars: simplicity of use, product quality and operational safety. Salt Bank pays special attention to the user experience, offering a clear, easy-to-navigate digital interface, along with cards with distinctive designs. Customer support is managed through a dedicated center – Care Center – where interactions are characterized by professionalism, promptness and a communication style adapted to the brand's values.

Notes to the consolidated and separate financial statements

1. Reporting entity (*continued*)

All communication channels – from the app to customer service – are aligned to maintain a coherent, modern and user-friendly identity. In addition to the above, if until 2024 the product offer was addressed only to individuals, starting with 2025 SALT has also diversified its products towards the freelancer segment, with a current account, business card, payment functions, integration with electronic invoicing services and savings spaces. The bank operates only online, having its registered office in Dimitrie Pompeiu Boulevard, number 5-7, et. 6, sector 2, Bucharest, Romania and as of December 31, 2025 the Bank had a number of 424 active employees (2024: 320 active employees).

O.C.N. Microfinanțare Chișinău

Microinvest is a non-banking financial institution in the Republic of Moldova. With over 22 years of experience, the company plays an important role in the local financial market, offering customized lending solutions for businesses, farmers and individuals and thus contributing to economic and social development. By financing SMEs and maintaining a high quality of the portfolio, Microinvest contributes to the consolidation of a more solid financial system in the Republic of Moldova. At the beginning of October 2025, B.C. Victoriabank S.A., part of the Banca Transilvania Group, became the sole shareholder of O.C.N. Microinvest S.R.L., the date on which Banca Transilvania took control of the company. At the end of the third quarter of 2025, Microinvest held a market share of 40.3% among non-banking financial institutions and ranked fifth in the top of the largest financial institutions in the Republic of Moldova (commercial banks and NCBs), by portfolio size, with a share of 6.0% of the total market. The number of active employees as of December 31, 2025 was 363. Microinvest holds the international GOLD certification in the field of customer protection, which confirms its commitment to transparency and responsible financing. At the same time, the institution is strengthening its position in the field of financial technology by developing digital lending services, with over 25% of the active customer base currently using digital channels.

2. Basis of preparation

a) Statement of compliance

The consolidated and separate financial statements of the Group and of the Bank have been prepared in accordance with the International Financial Reporting Standards (“IFRS”) as endorsed by the European Union and with the National Bank of Romania’s Order no. 27/2010 for the approval of the accounting regulations in accordance with IFRS, with subsequent changes („NBR Order no. 27/2010”), effective as at the Group’s and Bank’s annual reporting date, December 31, 2025.

The consolidated and separate financial statements of the Group and the Bank have been prepared in accordance with the going concern principle, which assumes the continuity of the activity in the foreseeable future. In addition, management is not aware of any material uncertainties that could cast significant doubt on their ability to continue as a going concern. Therefore, the consolidated and separate financial statements are prepared on a going concern basis.

b) Basis of measurement

The consolidated and separate financial statements were prepared on historical cost basis, except for the financial instruments recognized at fair value through profit or loss, the financial instruments at fair value through other items of comprehensive income and the revaluation of property and equipment and investment property.

Notes to the consolidated and separate financial statements

2. Basis of preparation (*continued*)

c) Functional and presentation currency – “RON”

The items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates ('the functional currency'). The functional currency of the entities within the Group is the Romanian leu “RON”, Euro “EUR” and the Moldovan leu “MDL”. The consolidated and separate financial statements are presented in Romanian lei “RON”, rounded to the nearest thousand.

d) Use of estimates and judgements

The preparation of the consolidated and separate financial statements in accordance with the IFRS as endorsed by the European Union implies that the management uses estimations and judgements that affect the application of accounting policies, as well as the reported value of assets, liabilities, income and expenses. The estimates and associated assumptions are based on historical data and various other factors that are believed to be relevant under the given circumstances. The result of which forms the basis of the judgements used in assessing the carrying value of the assets and liabilities for which no other evaluation sources are available. Actual results may differ from these estimates. The estimates and assumptions are reviewed on an ongoing basis. The review of the accounting estimates is recognized in the period in which the estimate is reviewed, if the review affects only that period, or in the period of the review and future periods if the review affects both current and future periods. The Group and the Bank make estimates and assumptions that affect the amounts of assets and liabilities reported within the next financial year. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are considered to be reasonable under the given circumstances. Information about estimates used in the application of the accounting policies which have a significant impact on the consolidated and separate financial statements, as well as the estimates involving a significant degree of uncertainty, are described in Note 5.

e) Changes in material accounting policies

a. *Global minimum top-up tax*

The Group adopted in 2023 the International Tax Reform — OECD Pillar Two Model Rules (Amendments to IAS 12), published on 23 May 2023. These amendments provide a mandatory temporary exception from the recognition of deferred tax related to the top-up tax, with immediate effect, and require enhanced disclosures regarding the Group's exposure to Pillar Two. The Group has applied this mandatory temporary exception to the accounting for deferred tax in respect of the top-up tax as at 31 December 2024, with the related impact being recognised as current tax when incurred. The Group operates in Romania, a jurisdiction that has enacted legislation to implement the global minimum tax (“Pillar Two”), in accordance with the OECD Model Rules on global minimum taxation. The Group also operates in the Republic of Moldova, a jurisdiction which, although it has not yet formally adopted such legislation, has expressed its intention to transpose the Pillar Two framework into national law. With respect to Romania, the Group has assessed the applicability of the Pillar Two legislative framework for the 2025 financial year and has determined the potential exposure to the top-up tax, in line with the GloBE Model Rules and the relevant domestic legislation. Based on the financial information available as at 31 December 2025, no top-up tax liability arises, as the Group's effective tax rate in Romania exceeds the 15% minimum rate required under Pillar Two. For activities carried out in the Republic of Moldova, where the statutory corporate income tax rate is 12% and the local legislation does not yet include provisions reflecting the Pillar Two Model Rules, the Group assessed the additional tax exposure arising in Romania, as the jurisdiction responsible for collecting the difference up to the global minimum rate. Based on the information available at year-end, the Group has estimated a supplementary tax impact of approximately RON 3 million as at 31 December 2025. This amount represents additional corporate income tax that will become payable in Romania in 2027, in accordance with the jurisdictional allocation rules applicable to the top-up tax.

Notes to the consolidated and separate financial statements

2. Basis of preparation (continued)

b. New classification by economic sectors used in financial reporting

Starting January 1, 2025, the Group and the Bank have implemented the amendment of the CAEN codes according to Government Decision no. 284/2025, which transposes into Romanian law the new version of the classification of economic activities – CAEN Rev. 3, aligned with NACE Rev. 2.1.. This change led to the restructuring of the economic sectors used in consolidated and separate financial statements, their number increasing as a result of a more detailed presentation of the economic sectors.

The new classification is used in all analyses and presentations by economic sectors in the consolidated and separate financial statements, including:

- analysis of credit risk exposures
- presentation of loan portfolio concentration and expected losses
- presentation of the structure of deposits attracted from customers by business segment, where relevant for the analysis of financing risks.

To ensure comparability of classification by economic sectors, the data presented as of December 31, 2024, have been revised in accordance with the new version of the National Economy Activity Classification CAEN Rev. 3 (see note 4 b ii), 22, and 33). The changes did not have a material impact on accounting estimates and the classification of exposures, but this impacted the presentation of information in the explanatory notes to the consolidated and separate financial statements.

f) Format in accordance with the requirements of the European Securities and Markets Authority (“ESMA”)

Due to the technical limitations of the software used for the preparation of the consolidated and separate financial statements in the European Single Electronic Format (“ESEF”), the tables included in the notes to the consolidated and separate financial statements are presented in a linear, logical and easy to understand manner.

3. Material accounting policies

The Group and the Bank has consistently applied the following accounting policies to all periods presented in these consolidated and standalone financial statements, except if mentioned otherwise. In addition, the Group and the Bank adopted Disclosure of Accounting Policies (Amendments to IAS 1 and IFRS Practice Statement 2) from January 1, 2023. The amendments require the disclosure of “material”, rather than “significant”, accounting policies.

a) Basis for consolidation

According to IFRS 10, control means that an investor has: 1) power over the investee; 2) exposure, or rights to variable returns from its involvement within the investee; 3) the ability to use its power over the investee to affect the amount of the investor's returns. The list of the Group's subsidiaries is presented in Note 1.

(i) Business Combinations

A business combination is accounted using the acquisition method at the date when the control is acquired, except for the cases when the combination involves entities or parties under common control or the acquired entity is a subsidiary of an investment entity. Each identifiable asset and acquired asset and assumed liability is evaluated at fair value at the acquisition date.

The non-controlling interests in the acquired entity, which represent current ownership interest and entitle the holder to a proportional share of the entity's net assets in the event of liquidation, are measured either at fair value or proportionally with the acquired ownership interest in the entity's net identifiable assets. Non-controlling interests that are not current ownership interests are measured at fair value. Goodwill is measured by deducting the identifiable net assets acquired from the aggregate of the consideration transferred, any non-controlling interests in the acquired entity and the fair value at the acquisition date of the equity participation in the acquired entity previously held by the acquiring entity. If the acquirer obtains a gain from a bargain purchase, this gain is recognized in the profit or loss after the management reassesses whether all the assets were acquired and all liabilities and contingent liabilities were assumed based on appropriate measurement.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

a) Basis for consolidation (*continued*)

(i) Business Combinations (*continued*)

The consideration transferred in a business combination is measured at the fair value of the assets transferred by the acquirer, the liabilities incurred or assumed and the equity instruments issued, but excludes the costs related to intermediation, advisory, legal, accounting, valuation and other professional or consulting services, general administrative costs that are recognized in the profit or loss.

(ii) Subsidiaries

The Group's subsidiaries are the entities under the Group's direct and indirect management. The management of an entity is reflected by the Group's capacity to exercise its authority in order to influence any variable return to which the Group is exposed based on its involvement in the entity. The factors that the Group must consider when deciding to include an entity in the consolidation are the following:

- the purpose and relevant activity of the entity;
- the entity's relevant activities and the manner in which they are determined;
- whether the Group's rights ensure its capacity to manage the entity's relevant activities;
- whether the Group is exposed or entitled to variable returns;
- whether the Group can use its capacity in order to influence returns.

If voting rights are relevant, the Group is considered to be in control if it holds, directly or indirectly, more than half of the voting rights of an entity, except when there is proof that another investor has the capacity of control over the relevant activities. Potential voting rights considered as substantial are also taken into account when determining the control of the entity. Moreover, the Group controls an entity even if it does not hold the majority of the voting rights, but however has the effective capacity to control the entity's relevant activities. This situation may occur when the dimension and dispersion of the shareholders' participations give authority to the Group to control the activities subject to investment. The subsidiaries are included in the consolidation starting from the date when the control is transferred to the Group. The Group reevaluates on an ongoing basis the control over the entities subject to investment, at least upon each quarterly reporting date. Therefore, any structural modification leading to the change of one or several control parameters is subject to revaluation. Such modification may include the change of the decision-making rights, changes in the contractual terms, financial or capital structure modifications, modifications caused by an event anticipated upon the initial documentation.

(iii) Non-controlling interest

The Group presents the non-controlling interest in its consolidated financial position within equity, separated from the equity of the parent company's shareholders. The non-controlling interest is measured proportionally with the percentage held in the net assets of the subsidiary. Changes in ownership interest which do not result in the loss of parent control of the subsidiary, are reflected as equity transactions.

(iv) Loss of control

If the parent loses the control of a subsidiary, it derecognizes the assets (including goodwill), the liabilities and the book value of any non-controlling interest at the date such control is lost. Any gain or loss arising from the loss of control is recognized in the profit or loss account. Upon the loss of control over a subsidiary, the Group: a) derecognizes the assets (including the attributable goodwill) and liabilities of the subsidiary at their book value, b) derecognizes the book value of any non-controlling interests held in the former subsidiary, c) recognizes the consideration received at fair value, as well as any distribution of the subsidiary's shares, d) recognizes any investment in the former subsidiary at fair value and e) recognizes any difference resulting from the above elements as gain or loss in the income statement. Any amounts recognized in the previous periods as other items of comprehensive income in relation to the respective subsidiary, shall be either reclassified in the consolidated statement of profit or loss or transferred to retained earnings, if required by other IFRS standards.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

a) Basis of consolidation (continued)

(v) Investments in associates

An associate is an entity over which the Group exercises significant influence in terms of financial and operating policy decision making, but without controlling the entity. Significant influence is when the Group holds between 20% and 50% of the voting rights. The existence and impact of the potential rights that are currently enforceable or convertible are also taken into consideration in order to determine whether the Group exercises significant influence. Other factors taken into consideration in order to determine whether the Group exercises significant influence are the representation in the Board of Directors and the inter-company relevant transactions. The existence of such factors may require the application of the equity method of accounting for a certain investment, even if the Group's investment in voting shares is lower than 20%. Investments in associates are booked according to the equity method. The share of the Group resulting from the association is adjusted in order to be in line with the Group's accounting policies and is booked in the consolidated statement of profit or loss as net investment income (loss) according to the equity method. The Group's share in the profits or losses of the related parties resulting from inter-company sales is removed from the consolidation basis.

In accordance with the equity method, the Group's investments in associates and jointly controlled entities are initially booked at cost, including any costs directly connected with transactions, and are subsequently increased (or decreased) to reflect both the proportional share of the Group after the acquisition and the net income (or loss) of the related entity or of the jointly controlled entity, as well as other direct changes in the shareholders' equity of the related entity or of the jointly controlled entity. The goodwill generated by the acquisition of a related entity or of a jointly controlled entity is included in the investment book value. Since goodwill is not reported separately, it is not tested for impairment. In fact, the whole investment accounted based on the equity method is tested for impairment upon each balance sheet preparation.

At the date when the Group ceases to have significant influence on the associates or the jointly controlled entity. The Group shall determine the profit or loss from the assignment of the investment based on the equity method, which shall be equal to the difference between: 1) the fair value of retained interest and any proceeds from disposing of a part of interest in the associate and 2) the carrying amount of the investments.

(vi) Management of investment funds

The Group manages and administrates assets invested in fund units on behalf of investors. The financial statements of these entities are not included in the consolidated financial statements, except when the Group controls the entity by holding authority, exposure or rights over variable incomes based on its participation of more than 50% in the open investment fund units. In line with the Group's strategy to develop open investment funds and to attract new investors, the Group removes from the consolidation basis the open funds managed by BT Asset Management SAI S.A., if the percentage of fund unit holdings decreases below 40% during two financial years.

As concerns the alternative funds managed by BT Asset Management SAI S.A.. The Group removes from the consolidation basis the holdings for which there is no significant influence of more than 20%.

If the Group holds units in open or alternative investment funds managed by an investment management company which is not included in the consolidation, the funds shall not be consolidated because the Group does not have the authority and decision-making power regarding the relevant activities of such entity.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

a) Basis of consolidation (*continued*)

(vii) Transactions eliminated from consolidation

Intra-group settlements and transactions, as well as any unrealized gains resulted from the intra-group transactions have been fully eliminated in the preparation of the consolidated financial statements. Unrealized gains resulted from transactions with equity accounted investees are eliminated in correlation with the investment in the related entity. Unrealized losses are eliminated in the same way as unrealized gains, but only to the extent that there is no evidence of impairment.

(viii) Presentation of the legal merger through absorption in the financial statements

The Group applies, by analogy, the exclusion of business combinations under common control from the scope of IFRS 3 'Business Combinations' for accounting the merger-by-absorption transactions in the separate financial statements of the absorbing entity. In accordance with this accounting policy, the identifiable assets and liabilities of the absorbed entity are recognized in the separate financial statements of the absorbing entity starting from the legal merger date, at their fair value amounts existing on that date. The comparative information presented in the separate financial statements has not been restated and reflects only the financial position and performance of the absorbing entity prior to the merger.

In the consolidated financial statements, the absorbed entity was included in the consolidation perimeter starting from the date control was obtained, and its income and expenses were recognized in the consolidated profit or loss for the period between the acquisition date and the legal merger date.

At the level of the separate financial statements, the net result of the absorbed entity, previously recognized in the consolidated financial statements up to the merger date, was transferred to retained earnings as of the legal merger date, without any impact on the current period result. In the absence of specific guidance in the International Financial Reporting Standards regarding the accounting for legal mergers by absorption, management considered that this approach provides a faithful and consistent representation of the financial position and performance of the absorbing entity.

b) Foreign currency transactions

(i) Foreign currency transactions

Transactions in foreign currency are recorded in RON at the official exchange rate at the date of the transaction. The exchange rate differences resulting from such transactions denominated in foreign currency are reflected in the statement of profit or loss at the transaction date and using the exchange rate valid at the respective date.

Monetary assets and liabilities denominated in foreign currencies at the date of the consolidated and separate statement of financial position are translated to the functional currency at the exchange rate valid at that date. FX differences are recognized in profit or loss. Non-monetary assets and liabilities that are measured in terms of historical cost in foreign currency are translated in the functional currency by using the exchange rate at the date of the transaction. Non-monetary assets and liabilities denominated in foreign currencies that are stated at fair value are translated to the functional currency at the exchange rate valid at the date when the fair value is determined.

(ii) Translation of foreign currency operations

The result and financial position of operations denominated in a currency different from the functional and presentation currency of the Group are translated into the presentation currency as follows:

- the assets and liabilities of this entity, both monetary and non-monetary, were translated at the closing rate at date of the consolidated and separate statement of financial position;
- income and expense items of these operations were translated at the average exchange rate of the period, as an estimate of the exchange rates at the dates of the transactions; and
- all resulting exchange differences have been recognized as OCI until the disposal of the investment.

Notes to the consolidated and separate financial statements**3. Material accounting policies (continued)****b) Foreign currency transactions (continued)****(ii) Translation of foreign currency operations (continued)**

The exchange rates for the major foreign currencies were:

Currency	December 31, 2025	December 31, 2024	Variation %
Euro ("EUR")	1: RON 5.0985	1: RON 4.9741	2.50%
United States Dollar ("USD")	1: RON 4.3417	1: RON 4.7768	-9.11%

c) Interest income and expenses*Recognition of interest income and expenses*

Interest income and expense are recorded for all loans and debt instruments, other than those at FVTPL, on an accrual basis using the effective interest method. This method defers, as part of interest income or expense, all fees paid or received between the parties to the contract that are an integral part of the effective interest rate, transaction costs and all other premiums or discounts. Fees integral to the effective interest rate include origination fees received or paid by the entity relating to the creation or acquisition of a financial asset or issuance of a financial liability, for example fees for evaluating creditworthiness, evaluating and recording guarantees or collateral, negotiating the terms of the instrument and for processing transaction documents.

Commitment fees received by the Group to originate loans at market interest rates are integral to the effective interest rate if it is probable that the Group will enter into a specific lending arrangement and does not expect to sell the resulting loan shortly after origination.

The Group does not designate loan commitments as financial liabilities at FVTPL.

For financial assets that are originated or purchased credit-impaired, the effective interest rate is the rate that discounts the expected cash flows (including the initial expected credit losses) to the fair value on initial recognition (normally represented by the purchase price). As a result, the effective interest is credit-adjusted.

Interest income is calculated by applying the effective interest rate to the gross carrying amount of financial assets, except for (i) financial assets that have become credit impaired (Stage 3), for which interest revenue is calculated by applying the effective interest rate to their amortised cost, and (ii) financial assets that are purchased or originated credit impaired, for which the original credit adjusted effective interest rate is applied to the amortised cost.

d) Fee and commission income

Fee and commission income represent commissions that are not an integral part of the effective interest rate of a financial instrument and that are accounted for in accordance with IFRS 15. Such income includes fee income in the banking units (*transactional fees*, such as: commissions for transactions at ATMs, commissions for payments, for issuing the account statement, commissions for the collection/encashment of dividends, commissions for currency exchanges; *brokerage and execution fees, syndication fees* etc.), fee income from capital markets (*advisory fees, investment activities fees, brokerage and execution fees, custodial fees*), fee income in wealth management.

The commissions and expenses obtained from the services provided over a certain period of time are recognized in that period as the services are provided. Commissions and expenses obtained for the completion of a specific service or significant event are recognized upon completion of the service or when the event occurs, for example, upon completion of the transaction to which it refers.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

d) Fee and commission income (*continued*)

The obligation to perform the service (and the recognition of income) can be fulfilled at a given moment or over time. For each identified performance obligation, the Group establishes at the beginning of the contract whether it fulfills the performance obligation in time or at a given moment and whether the consideration is fixed or variable, including whether the consideration is limited, for example, by external factors that cannot be influenced by to the Group.

The group records income and expenses from commissions in profit or loss:

- either in time, because the performance obligation is satisfied in time, and the client simultaneously receives and consumes the benefits offered by the performance by the Group, as the Group fulfills the obligations (being one of the 3 criteria that must be met for a performance obligation to be satisfied in time). These include, for example, commissions for transactions with clients when the services are provided continuously, settlement commissions for financial instruments, custody commissions, consulting fees;
- or at the time when the service is provided, in cases where a performance obligation is not fulfilled in time. These include, for example, distribution commissions received and some consulting fees.

e) Net trading income

Net trading income represents the difference between the gain and loss related to financial assets and financial liabilities held-for trading, foreign exchange transactions, derivatives and foreign exchange position revaluation.

f) Realised net loss/gain related to financial assets measured at fair value through other items of comprehensive income

The net loss/gain related to financial assets measured at fair value through other items of comprehensive income comprises the gain and loss from the sale of financial assets measured at fair value through other items of comprehensive income. Net gain and loss from the sale of financial assets measured at fair value through other items of comprehensive income are recognized in the income statement at the moment of their sale or their redemption. For debt instruments, the net gain/loss related represents the difference between the sale price and the acquisition cost related to the financial assets measured at fair value through other items of comprehensive income.

g) Realised net loss/gain from financial assets which are required to be measured at fair value through profit or loss

The net loss/ gain from financial assets which are required to be measured at fair value through profit or loss includes the gain and loss both from the revaluation at fair value and the sale of financial assets which are required to be measured at fair value through profit or loss.

h) Other operating income

h1) Dividend income

Dividend income is recognized in profit or loss at the date when the right to receive such income is established and it is probable that the dividends will be collected. Dividends are reflected as a component of other operating income.

For some of the Bank's subsidiaries, the only profit available for distribution is the profit for the year recorded in the Romanian statutory accounts, which differs from the profit in these consolidated and separate financial statements prepared in accordance with IFRS, as endorsed by European Union, due to the differences between the applicable Romanian Accounting Standards and IFRS, as endorsed by the European Union.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

h) Other operating income (*continued*)

h2) Income from insurance intermediation

Income from insurance brokerage is recognised in profit or loss for the year when insurance products are sold to customers through the bancassurance brokerage service. If the calculation of these fees is not completed and agreed with the insurer by the end of the month, the Group and the Bank recognise an accrued income in the consolidated result based on their own estimates.

h3) Income from VISA, MASTERCARD, WU services

The Group and the Bank recognize income received from Visa, Mastercard and Western Union representing discounts granted for the volume of transactions performed. This income is booked on a monthly basis based on the invoice issued to the Group and the Bank.

h4) Income from the assignment of shareholdings

This income represents a gain or a loss from disposal of shares in subsidiaries which is recognised in the statement of profit or loss on the date of the assignment of the equity securities and their derecognition in the statement of financial position. This gain or loss represent the difference between the selling price and the fair value of the net assets sold.

h5) Other operating income

The Group and the Bank also recognize the following types of income under "Other operating income": income from the disposal of tangible assets and those from the sale of the non-current assets held for sale, income from compensations, fines, penalties, income from: debt recoveries related to closed accounts, surplus from ATM transactions not claimed by customers, cash at hand differences, income from recovered legal expenses, other recoveries from operating expenses.

i) Contribution to the Bank Deposit Guarantee Fund and to the Resolution Fund

The retail deposits and certain legal entity deposits, including SME deposits, are guaranteed up to EUR 100,000 in Romania and MDL 100,000 in the Republic of Moldova by the Bank Deposit Guarantee Fund (the "FGDB") according to the regulations in force (Law 311/2015 regarding the deposit guarantee scheme and the Deposit Guarantee Fund in Romania and the law regarding the deposit guarantee within the banking system no.575-XV from 2003, December 26, in the Republic of Moldova).

The Romanian credit institutions are obliged to pay an annual contribution to the Deposit Guarantee Fund, in order to guarantee the clients' deposits in case of the credit institution's insolvency, as well as an annual contribution to the Resolution Fund.

It is mandatory for the banks in the Republic of Moldova to contribute an annual fee to FGDB, through quarterly payments which are calculated based on the value of the pledged deposits and the risk grade for each bank, and also an annual fee to the Resolution Fund.

The Group and the Bank applied IFRIC 21 "Levies" to determine when the obligation to be recognized. As this contribution to the FGDB corresponds to a tax therefore it needs to be fully recognized as an expense at the time the obligating event occurs. In this case, the obligation arises annually on January 1, as the Bank performs activities related to deposits received.

j) Lease assets and liabilities

Group applies IFRS 16 provisions to all leases, including leases of right-of-use assets in a sublease, except for:

- a) leases to explore for or use minerals, oil, natural gas and similar non-regenerative resources;
- b) service concession arrangements within the scope of IFRIC 12 Service Concession Arrangements;

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

j) Lease assets and liabilities (*continued*)

- c) licenses of intellectual property granted by a lessor within the scope of IFRS 15 Revenue from Contracts with Customers; and
- d) rights held by a lessee under licensing agreements within the scope of IAS 38 Intangible Assets for such items as motion picture films, video recordings, plays, manuscripts, patents and copyrights.

The Group presents in these financial statements, lease assets and liabilities for the following types of transactions:

a) as a lessee:

- Lease of properties used for financial activities;
- Lease of land;
- Lease of vehicles;
- Lease of other low-value assets.

b) as a lessor:

- Finance lease of vehicles and equipment;
- Finance lease of real estate.

Identification of a lease contract

A contract is, or contains a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. The Group reassesses whether a contract is, or contains, a lease only if the terms and conditions of the contract are changed.

To assess whether a contract conveys the right to control the use of an identified asset for a period of time, the Group shall assess whether, throughout the period of use, the customer has both of the following:

- (a) the right to obtain substantially all of the economic benefits from use of the identified asset and
- (b) the right to direct the use of the identified asset.

a) The Group as a lessee

As per IFRS 16 provisions, a lessee is required to recognise a right-of-use asset and a lease liability at the initial recognition of the contract.

Right of use – initial measurement

The right-of-use asset shall comprise:

- (a) the amount of the initial measurement of the lease liability;
- (b) any lease payments made at or before the commencement date, less any lease incentives received;
- (c) any initial direct costs incurred by the lessee; and
- (d) an estimate of costs to be incurred by the lessee in dismantling and removing the underlying asset, restoring the site on which it is located or restoring the underlying asset to the condition required by the terms and conditions of the lease, unless those costs are incurred to produce inventories.

Lease liability – initial measurement

Represents the present value of the lease payments that are not paid at commencement date. The lease payments shall be discounted using the interest rate implicit in the lease, if that rate can be readily determined. If that rate cannot be readily determined, the lessee shall use the lessee's incremental borrowing rate.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

j) Lease assets and liabilities (*continued*)

a) *The Group as a lessee (continued)*

The lease payments included in the measurement of the lease liability comprise the following payments for the right to use the underlying asset during the lease term that are not paid at the commencement date:

- (a) fixed payments, less any lease incentives receivable;
- (b) variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;
- (c) amounts expected to be payable by the lessee under residual value guarantees;
- (d) the exercise price of a purchase option if the lessee is reasonably certain to exercise that option (assessed considering all the relevant factors); and
- (e) payments of penalties for terminating the lease, if the lease term reflects the lessee exercising an option to terminate the lease.

Subsequent measurement - Right-of-use asset

The Group shall measure the right-of-use asset at cost, less any accumulated depreciation and any accumulated impairment losses, and adjusted for any remeasurement of the lease liability due to lease contract. If the lease transfers ownership of the underlying asset to the Group as a lessee by the end of the lease term or if the cost of the right-of-use asset reflects that the Group will exercise a purchase option, the Group shall depreciate the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Group shall depreciate the right-of-use asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term.

Subsequent measurement - Lease liability

The Group measures the lease liability by:

- a) increasing the carrying amount to reflect interest on the lease liability;
- b) reducing the carrying amount to reflect the lease payments made; and
- c) remeasuring the carrying amount to reflect any reassessment or lease modifications.

After the commencement date, the Group remeasures the lease liability to reflect changes to the lease payments. The Group recognizes the amount of the remeasurement of the lease liability as an adjustment to the right-of-use asset. However, if the carrying amount of the right-of-use asset is reduced to zero and there is a further reduction in the measurement of the lease liability, it recognizes any remaining amount of the remeasurement in the statement of profit or loss.

b) *The Group as a lessor*

Initial measurement

At the commencement date, the Group, as a lessor, recognizes assets held under a finance lease in its statement of financial position and presents them as a receivable at an amount equal to the net investment in the lease. The lessor uses the interest rate implicit in the lease to measure the net investment in the lease.

The interest rate implicit in the lease is defined in such a way that the initial direct costs are included automatically in the net investment in the lease.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

j) Lease assets and liabilities (*continued*)

b) The Group as a lessor (*continued*)

The lease payments included in the measurement of the net investment in the lease comprise the following payments for the right to use the underlying asset during the lease term that are not received at the commencement date:

- fixed payments less any lease incentives payable;
- variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;
- any residual value guarantees provided to the lessor by the lessee, a party related to the lessee or a third party unrelated to the lessor that is financially capable of discharging the obligations under the guarantee;
- the exercise price of a purchase option if the lessee is reasonably certain to exercise that option;
- payments of penalties for terminating the lease, if the lease term reflects the lessee exercising an option to terminate the lease.

Subsequent measurement

The Group recognizes finance income over the lease term, based on a pattern reflecting a constant periodic rate of return on the lessor's net investment in the lease. The Group aims to allocate finance income over the lease term on a systematic and rational basis and shall apply the lease payments relating to the period against the gross investment in the lease to reduce both the principal and the unearned finance income.

The Group applies the derecognition and impairment requirements in IFRS 9 to the net investment in the lease. It reviews regularly estimated unguaranteed residual values used in computing the gross investment in the lease. If there has been a reduction in the estimated unguaranteed residual value, the Group reviews the income allocation over the lease term and recognizes immediately any reduction in respect of amounts accrued.

k) Income tax expense

Income tax for the year includes the current tax and the deferred tax. The income tax is recognized in the result for the year or in the shareholders' equity, if the tax is related to shareholders' equity items.

Current tax is the tax payable with respect to the profit for the period, determined based on the percentages applied at the date of the consolidated and separate statement of financial position and all the adjustments related to the previous periods. The adjustments which influence the fiscal base of the current tax are: non-deductible expenses, non-taxable income, similar expense/ income items and other tax deductions.

Deferred tax is determined based on the balance sheet liability method for the temporary differences between the fiscal base for the calculation of the tax on assets and liabilities and their accounting value used for reporting under the consolidated and separate financial statements. Deferred tax is not recognized for the following temporary differences: initial recognition of goodwill, initial recognition of assets and liabilities resulting from transactions which are not business combinations and do not affect the accounting or tax profit and differences resulting from investments in subsidiaries, provided that they are not reversed in the near future and the moment of reversal is being controlled by the entity.

The temporary differences may arise in a business combination, so that an entity may recognize any resulting deferred tax assets or liabilities as identifiable assets and liabilities at the acquisition date. The temporary differences on the initial recognition of assets or liabilities in a transaction that is not a business combination affects neither accounting nor taxable profit or loss.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

k) Income tax expense (*continued*)

Under local tax law, the tax loss incurred by a company that ceases to exist as a result of an absorption merger can be taken over and recovered by the entity taking over the assets of the absorbed company, in proportion to the assets transferred. The annual tax loss is recovered from the taxable profits obtained in the following 7 consecutive years, in the order in which they are recorded. For tax losses related to the years prior to 2024 and remaining unrecovered on December 31, 2023, the recovery is made starting with 2024, within the limit of 70% of the taxable profits of each year, for the remaining period of the 7 consecutive years from the time of recording each loss.

To report the unutilized fiscal losses, the deferred tax claims are recognized only to the extent to which it is probable to obtain taxable profit in the future after compensation with the tax loss from the previous years and with the recoverable tax on profit. Deferred tax claims are diminished to the extent to which the related tax benefits are unlikely to be achieved. The Group has determined that the global minimum top-up tax – which is required to pay under Pillar Two legislation – is an income tax in scope of IAS 12. The Group has applied a temporary mandatory relief from deferred tax accounting for the impacts of the top-up and accounts for it as a current tax when it is incurred.

The Group operates in Romania, which has enacted new legislation to implement the global minimum top-up tax.

For the fiscal year 2025, the Group is not impacted by the new legislation for transactions carried out in Romania, where the effective tax rate calculated was above 15%. However, the Group is impacted by the new legislation for transactions carried out in the Republic of Moldova, where the statutory tax rate is 12% and the domestic legislation does not contain any tax provision regarding the Pillar Two Model Rules. Since the national legislation of the Republic of Moldova does not contain any tax provision with respect to the Model Rules of Pillar Two, an additional corporate income tax for the year 2025 will be payable in Romania at the level of the ultimate parent company for transactions carried out in Moldova, in amount of approximately RON 3 millions.

The Group has applied a temporary mandatory relief from deferred tax accounting for the impacts on the top-up tax and accounts for it as a current tax when it is incurred (see Note 2 e).

l) Financial assets

The Group and the Bank classify the financial assets based on the cash flow characteristics of each instrument and the business model within which an asset is held. A business model reflects how the Group and the Bank manage the financial assets in order to achieve its business objectives. There are three types of business models:

“Hold to collect” business model:

This business model refers to financial assets that are classified in order to collect cash flows (for example: loans, government securities, bonds held outside the trading portfolio). If these assets pass the SPPI test (Solely Payment of Principal and Interest), they are measured at amortized cost and included in the periodical calculation of expected credit losses.

The general expectation is that the assets classified in this category are held until their maturity, however sales may incur and are acceptable; if they are infrequent (even if significant in value) or insignificant in value both individually and in aggregate (even if frequent), when the risk profile of such instruments increases and such assets no longer are in line with the Group's and the Bank's investment policy. A higher frequency of sales during a certain period is not necessarily in contradiction with this business model, if the Group and the Bank are able to justify the reasons for such sales and to prove that such sales do not reflect a change in the current business model. Nevertheless, there are no such cases in 2025.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

1) Financial assets (*continued*)

“Hold to collect and sell” business model:

Under this business model, financial assets are held to collect the contractual cash flows, but they may also be sold in order to cover liquidity requirements or to maintain a certain interest return on the portfolio. They are measured at fair value through other items of comprehensive income (reserves) and may include government securities and bonds, in case SPPI test is passed.

Other business models: are those which do not meet the criteria of the business models mentioned above, for example business models in which the primary objective is realizing cash flows through sale, held for trading business models, business models under which assets are managed on a fair value basis, business models under which financial assets are acquired for sale/trading and measured through profit or loss (tradable securities, tradable shares, etc.). The portfolio is managed based on the market value evolution in respect of the assets concerned and includes frequent sales and purchases for the purpose of maximizing profit.

The Group and the Bank recognize all financial assets and liabilities at the transaction date. The transaction date is the date when the Group and the Bank undertake to buy or to sell an asset.

At initial recognition, a financial asset can be classified as:

(a) measured at amortized cost, provided that the following conditions are cumulatively fulfilled:

- the asset is held under a business model in which the primary objective is to collect contractual cash flows;
- the contractual terms of the financial asset generate cash flows at specific dates, representing solely payments of principal and interest.

(b) measured at fair value through other comprehensive income, provided that the following conditions are cumulatively fulfilled:

- the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets;
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

(c) measured at fair value through profit or loss, if financial assets do not meet the criteria according to which the contractual cash flows need to be Solely Payments of Principal and Interest (the SPPI test) or if the assets are held for trading (for example derivatives, fund units and certain securities).

Investments in equity instruments are measured at fair value through profit or loss. However, provided that such instruments are not held for trading, the Group and Bank management can make an irrevocable election at inception to present changes in fair value in other comprehensive income (except for dividend income which is recognised in profit or loss).

Therefore, if equity instruments are measured at fair value through other comprehensive income, such instruments will not be classified as monetary items and the accumulated profit or loss, including that resulting from currency exchange, will be transferred to the entity's equity upon the derecognition of such instruments. If the equity instrument is held for trading, changes in fair value are presented in profit or loss. The gains and losses from investments in equity instruments measured at fair value through profit or loss are included in the statement of profit or loss under “Net trading income” for held for trading equity instruments. Investments in equity instruments, representing usually strategic investments which are not planned to be disposed of in the foreseeable future and are not included in the trading portfolio, have been classified as financial assets required to be measured at fair value through other comprehensive income.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

1) Financial assets (*continued*)

In this case, the Group and the Bank have irrevocably decided to present fair value changes under comprehensive income, whereas the gains or losses related to the respective instruments will be transferred directly to the Group's equity, without being reclassified (or recycled) to profit or loss.

Bonds are measured at fair value through other items of comprehensive income, under the provisions of the SPPI test criteria and the "hold to collect and sell" business model. The Group and the Bank recognize an allowance for expected credit losses related to such assets measured at fair value through other items of comprehensive income. This provision will be recognized under other comprehensive income and does not diminish the book value of the financial asset.

Bonds which meet the SPPI test criteria and the "hold to collect" business model are measured at amortized cost. The Group and the Bank recognize impairment allowances related to financial assets measured at amortized cost.

Fund units held with mutual funds which fail the solely payments of principal and interest ("SPPI") criterion are mandatorily measured at fair value through profit or loss.

In the separate statement of financial position, equity instruments representing investments in subsidiaries continue to be measured at cost, according to IAS 27 - "Separate Financial Statements". Derivative instruments are measured at fair value through profit or loss. Impairment requirements under IFRS 9 are based on expected credit losses and imply the timely recognition of expected estimated credit losses. Expected credit losses ('ECL') are associated with financial instrument assets carried at amortised cost and fair value through other items of the comprehensive income and the exposure from loan commitments and financial guarantee contracts.

In order to measure expected credit losses, the Group and the Bank are grouping their assets into three categories: stage 1 (assets with no significant increase in credit risk from initial recognition), stage 2 (assets for which significant increase in credit risk from initial recognition has been observed) and stage 3 (credit-impaired). More details about how the Group and the Bank are grouping their financial assets can be found in Note 4 "Risk management".

Some financial instruments include both a loan and an undrawn commitment component and the Group's and the Bank's contractual ability to demand repayment and cancel the undrawn commitment does not limit the Group's and the Bank's exposure to credit losses to the contractual notice period.

For such financial instruments, and only those financial instruments, the Group and the Bank shall measure expected credit losses over the period that the Group and the Bank are exposed to credit risk and expected credit losses would not be mitigated by credit risk management actions, even if that period extends beyond the maximum contractual period. Also, the Group and the Bank recognize a loss allowance for expected credit losses also for financial guarantee according to IFRS 9 principles. Expected credit losses for off-balance exposures are considered and recognised at the time when the Group and the Bank records in their off balance sheet records a commitment with the risk of being converted into a loan.

The calculation basis for these losses includes exposures from commitments related to letters of credit, letter of guarantee, undrawn amount of the loans granted by the Group and the Bank and factoring commitments.

The expected credit loss calculation is made according to IFRS 9 and is based on the probability of conversion into credit, the probability of default and loss given default.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

l) Financial assets (*continued*)

Derecognition policy

Financial assets, or a portion thereof, are derecognised when the contractual rights to receive the cash flows from the assets have expired, or when they have been transferred and

- the Group and the Bank transfer substantially all the risks and rewards of ownership, or
- the Group and the Bank neither transfer nor retain substantially all the risks and rewards of ownership and the Group and the Bank did not retain control.

The Group and the Bank shall directly reduce the gross carrying amount of a financial asset when they have no reasonable expectations of recovering this financial asset in its entirety or a portion thereof. A write-off constitutes a derecognition event. The recovery procedures for these assets are not stopped, the loans being highlighted in off-balance sheet accounts, until the full collection of the receivables or until a definitive deletion. Information regarding the volume of these exposures is presented in the Notes 22 and 23.

Other events that lead to a derecognition are those of the type of definitive deletions from accounting records:

- Debt forgiveness or write-off of the receivable following the exhaustion of the legal ways of recovery, the prescription for the terms of execution or some decisions regarding the opportunity to continue the recovery procedures (efforts/cost versus effects/revenues);
- Sale/assignment of receivables to a third party;
- Sale of loan portfolios.

The Group and the Bank enter into transactions where they retain the contractual rights to receive cash flows from assets but assume a contractual obligation to pay those cash flows to other entities and transfer substantially all of the risks and rewards.

The transactions are accounted for as 'pass through' transfers that result in derecognition if the Group and the Bank:

- Have no obligation to make payments unless they collect equivalent amounts from the assets;
- Are prohibited from selling or pledging the assets; and
- Have an obligation to remit any cash they collect from the assets without material delay.

Collateral (shares and bonds) pledged by the Group and the Bank under standard repurchase agreements and securities lending and borrowing transactions are not derecognised because the Group and the Bank retain substantially all the risks and rewards on the basis of the predetermined repurchase price, and the criteria for derecognition are therefore not met.

The Bank derecognizes a transferred financial asset if it transfers substantially all the risks and rewards of ownership of the financial asset. The criteria set at Group level to evaluate modifications leading to derecognition of financial assets, are developed having in mind that they must reflect modifications that are substantial enough (either quantitatively or qualitatively) to satisfy the derecognition requirements. On the quantitative side, these criteria refer to a significance threshold of 10% by analogy to the de-recognition trigger set by IFRS 9 for modifications of financial liabilities. On the qualitative side, these criteria refer to contractual modifications that are substantially changing the nature of lender's risks associated with the pre-existing loan contract.

m) Financial liabilities

A financial debt is any debt that represents:

(a) a contractual obligation to deliver cash or another financial asset to another entity; or to exchange financial assets or financial liabilities with another entity under conditions that are potentially unfavorable to the entity; or

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

m) Financial liabilities (*continued*)

(b) a contract that will be or can be settled in the entity's own equity instruments and is:

- (i) a non-derivative instrument for which the entity is or may be obliged to deliver a variable number of its own equity instruments; or
- (ii) a derivative instrument that will be or can be settled otherwise than by exchanging a fixed amount of cash or another financial asset for a fixed number of the entity's own equity instruments.

Examples of financial liabilities that can be found in the Group's financial position statement are: deposits received from customers, amounts owed to banks and other financial institutions, subordinated loans, other loans, bonds issued, derivative instruments and other financial instruments that meet the definition of a financial liability.

Classification and evaluation

The Group and the Bank classify financial liabilities at amortized cost with the exception of the following debt categories:

- financial liabilities measured at fair value through profit or loss (FVTPL). Financial liabilities measured at fair value through profit or loss contain two sub-categories: financial liabilities held for trading purposes, which includes derivative instruments, and financial liabilities designated at FVTPL upon initial recognition;
- financial liabilities that arise when a transfer of a financial asset does not meet the conditions to be derecognized or is accounted for using the going concern approach;
- commitments to provide a loan at an interest rate below the market value and financial guarantee contracts;
- the contingent compensation recognized by the Group as the acquiring entity in a business combination.

The financial liabilities valued at amortized cost held by the Group and the Bank include deposits drawn from customers, from banks, loans from financial institutions, subordinated loans, bonds issued as well as other amounts in transit from customers and banks or amounts to be paid to suppliers.

These financial liabilities are recognized at the initial settlement date at fair value, which is, normally, the consideration received minus the transaction costs directly attributable to the financial liability. Subsequently, these instruments are valued at amortized cost using the effective interest method. If some debts also have an equity component, the Group and the Bank analyze the substance of the respective contracts so as to reflect the instrument in accordance with IFRS requirements.

Embedded derivatives are separated from the host contract and measured separately if the separation criteria mentioned by IFRS 9 are met.

Financial liabilities cannot be reclassified.

The Group derecognizes a financial liability when the contractual obligations are extinguished or canceled or have expired.

n) Cash and cash equivalents

Cash and cash equivalents include: cash at hand, unrestricted balances held with National Bank of Romania, National Bank of Moldova and National Bank of Italy and highly liquid financial assets with original maturities of less than three months, which are subject to insignificant risk of fair value changes.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

n) Cash and cash equivalents (*continued*)

The minimum required reserves to be held with the regulatory authorities consist of the average daily amounts held in the accounts opened with the regulatory authorities.

These amounts can be used every day in daily operations, the only requirement is to maintain an average monthly amount (over a period of 30 days) above a certain level, thus these amounts are not restricted and they must be included in cash and equivalents of cash. Cash and cash equivalents are carried at amortized cost in the consolidated and separate statement of financial position.

o) Tangible assets

(i) Recognition and measurement

Tangible assets are stated at the revalued amount less accumulated depreciation.

Measurement upon initial recognition

The cost of a fixed asset item consists in:

- a) the acquisition price, including customs charges and non-refundable acquisition costs, after the deduction of all commercial discounts.
- b) where relevant, interest costs that can be directly attributed to the acquisition, construction or production of a fixed asset.
- c) any costs directly incurred in order to bring the asset at the adequate location or condition required by the management for proper functioning.
- d) the dismantling costs, if applicable (not only the initial estimates of these costs made at the time of their installation, but also the changes in these initial estimates).

Subsequent measurement

All tangible assets are stated at the revalued amount, less the accumulated depreciation and impairment losses.

The costs of tangible assets under construction are capitalized if the criteria for tangible asset recognition are met, notably: they generate future economic benefits, they can be measured reliably and they lead to the improvement of technical parameters, ensuring an ongoing use of the assets under normal conditions. The costs for maintenance and current repairs are not recognized under assets.

Tangible assets under construction are starting to be depreciated when they are in the location and condition necessary for it to be capable of operating in the manner intended by management. This condition is fulfilled when there is a sign-off for reception and deployment by the asset's users.

The carrying amounts of assets are analyzed during the revaluation process upon the issuance of the statement of financial position. The Group and the Bank shall annually reassess all tangible assets with an external evaluator, who is not an employee of the Group or the Bank.

For revalued assets, if an asset's carrying amount is increased as a result of a revaluation, the increase shall be recognized in other comprehensive income. If an asset's carrying amount is decreased as a result of a revaluation, the decrease shall be recognized in profit or loss, except the case when the decrease shall be recognized in other comprehensive income to the extent of any credit balance existing in the revaluation surplus in respect of that asset.

When an item of property and equipment is revalued, the accumulated depreciation at the revaluation date is recalculated in proportion to the change in the gross carrying amount of the asset, so that the carrying amount of the asset, after revaluation, is equal to its revalued amount. The revaluation reserve for premises and equipment included in equity is transferred directly to retained earnings when the revaluation surplus is realized on the retirement or disposal of the asset.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

o) Tangible assets (*continued*)

(ii) Subsequent costs

The Group and the Bank recognise in the carrying amount of tangible assets the cost of replacing such an item when that cost is incurred or if it is probable that the future economic benefits embodied with the item may be transferred to the Group and to the Bank and the cost of the item can be measured reliably. All other costs are recognized in the income statement as an expense as incurred.

(iii) Depreciation

Depreciation is calculated on a straight-line basis over the estimated useful life of each item of tangible assets. Land is not depreciated.

The estimated useful lives are as follows:

Buildings	50 years
Leasehold improvements (average)	6 years
Computers	4 years
Equipment	2 - 24 years
Furniture	3 - 20 years
Vehicles	4 - 5 years

The leasehold improvements are depreciated over the lease term, which varies between 1 and 36 years. Depreciation methods, useful lives and residual values are reassessed at the reporting date.

p) Investment property

Investment property is property (land, buildings or parts of a building) held by the Group and the Bank to earn rent, for capital appreciation or both, rather than for:

- the use in production, the supply of goods or services or for administrative purposes; or
- the sale in the ordinary course of business.

(i) Recognition and measurement

Investment property is recognized as an asset when:

- it is probable that the future economic benefits that are associated with the investment may flow to the Group and to the Bank;
- the cost of the investment property can be measured reliably.

An investment property is measured initially at cost, including transaction costs. The cost of an investment property includes its purchase price (if purchased) and other directly attributable expenses (e.g. fees for legal services, property transfer taxes and other transaction costs).

(ii) Subsequent measurement

The accounting policy for the subsequent measurement of the investment properties of the Group and the Bank is based on the fair value model. This policy is applied consistently for all the investment properties held by the Group and the Bank.

When the Group or the Bank, as lessees use the fair value model to measure an investment property that is held as a right-of-use asset, they shall measure the right-of-use asset, and not the underlying property, at fair value.

Gains or losses from the change in the fair value of the investment properties are recognized in profit or loss in the period in which they arise.

The fair value of the investment properties reflects the market conditions at the reporting date.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

p) Investment property (*continued*)

(iii) Transfers

Transfers to or from investment property are made when, and only when, there is a change in use of the asset. For the transfer of an investment property, measured at fair value, to tangible assets, the property's deemed cost for subsequent accounting is its fair value at the date of the change in use. An investment property is derecognized on disposal or when it is permanently withdrawn from use and no future benefits are expected from its disposal.

The gain or loss on the retirement or disposal of an investment property is recognized in profit or loss in the period of the retirement or disposal.

(iv) Disposals

Derecognition of an investment property will be triggered by a change in use or by sale or disposal or when it is permanently withdrawn from use and has no future economic value. When an investment property is disposed of, it is eliminated from the statement of financial position, while the gain or loss on the retirement or disposal of an investment property is recognized in the statement of profit or loss in the period the disposal is related to. The gain or loss arising on disposal is determined as the difference between net disposal proceeds and the carrying amount.

q) Intangible assets

Upon their initial recognition, intangible assets are measured at cost. The cost elements of intangible assets under construction are capitalized if criteria for intangible asset recognition is being met: future economic benefits associated with the item will flow to the entity, cost of the item can be reliably measured, the result will increase the future performance rate and the asset is separately identifiable within an economic activity. Maintenance costs and technical support are recognized in profit or loss as these are being incurred. Intangible assets in progress are recognized as intangible assets at the moment of reception and deployment.

(i) Goodwill and gain on a bargain purchase

Goodwill and gain on a bargain purchase arise on the acquisition of a new subsidiary by means of business combination. Goodwill represents the positive difference (excess) between the cost of acquisition and the net fair value of the acquired identifiable assets and assumed liabilities and contingent liabilities.

Gain of a bargain purchase is immediately recognized in profit or loss, after reanalyzing the manner of identification and fair valuation of the assets, liabilities and identifiable contingent liabilities at the acquisition date.

Subsequent measurement

Goodwill is measured at cost, less accumulated impairment losses.

(ii) Software

Costs associated with the development and maintenance of software programs are recognized as an expense when incurred. Intangible assets in progress are recognised as intangible assets at the time of acceptance and commissioning.

Costs that are directly associated with the production of identifiable and unique software products controlled by the Group and the Bank, and that will generate future economic benefits for a period exceeding one year, are recognized as intangible assets. Subsequent expenditure on software assets is capitalized only if it increases the future performance of such assets, beyond initial specifications and lifespan. All other expenditure is reflected as an expense as incurred.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

q) Intangible assets (*continued*)

(ii) Software (*continued*)

Amortization is recognized in the income statement on a straight-line basis over the estimated useful life of the intangible asset. The estimated useful lives of intangible assets are reviewed at the reporting date and range between 1 and 5 years. The useful life of intangible assets derived from contractual rights should not exceed the validity period of such contractual rights, but it may be shorter depending on the estimated period of use of such assets by the entity.

Intangible assets in progress are not amortized before they are put into service.

Subsequent measurement

Upon their initial recognition, intangible assets are measured at cost. After the initial recognition, intangible assets are carried at the acquisition amount less any subsequent accumulated amortization and any subsequent accumulated impairment losses.

At the end of each reporting period it has to be assessed whether there is an indication that an intangible asset may be impaired. If an indication exists finite life intangibles are tested for impairment. Irrespective of whether there is an indication of impairment, intangible assets with an indefinite useful life, such as goodwill acquired in a business combination and an intangible asset not yet available for use are tested annually for impairment.

For software, the software is assessed as impaired when the remaining utility of the software is permanently diminished below its book value.

r) Fixed assets held-for-sale

An asset is considered as a fixed asset held-for-sale if the following conditions are met: the asset value is recovered through sale and not by its continuous use, the asset must be available for immediate sale and the sale of the asset must be likely to happen, the probability of sale is justified by means of a sales plan at the level of the Group's and the Bank's management and by the active involvement of the Group and the Bank in identifying a buyer.

If the asset is reclassified from tangible assets according to IAS 16, the period between the date of reclassification and the date of sale should not exceed 12 months; the valuation of the asset classified as held-for-sale shall consider the lower value between the carrying amount and the fair value, minus the sales-related costs.

s) Impairment of non-financial assets

An impairment loss is recognized if the carrying amount of the asset or its cash-generating unit exceeds its recoverable amount. A cash-generating unit is the smallest identifiable group generating cash flows and independent from other assets and groups.

Impairment losses recognized in respect of cash-generating units are allocated to reduce the carrying amount of any goodwill allocated to the respective cash-generating unit (group of units) and then to reduce the carrying amount of any other assets in the unit on a pro rata basis.

The recoverable amount of an asset or cash-generating unit is the greater of its value in use and its fair value, less the cost of sale of such asset or unit. In assessing the value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments and the risks specific to the asset.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

s) Impairment of non-financial assets (*continued*)

In respect of other non-financial assets, impairment losses are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss in other non-financial assets than goodwill is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss on assets is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortization, if no impairment loss had been recognized.

t) Deposits from customers

Customer deposits are initially recognised at fair value, including transaction costs, and subsequently measured at amortised cost using the effective interest rate method.

u) Issued bonds, loans from banks and financial institutions

Borrowings such as loans from banks and other financial institutions and issued bonds are initially recognized at fair value, notably as proceeds resulting from such instruments (fair value of consideration received), net of transaction costs incurred. Issued bonds and loans from banks and other financial institutions are subsequently carried at amortized cost.

v) Provisions

Provisions for other risks are recognized in the consolidated and separate statement of financial position when the Group and the Bank have an obligation as a result of a past event and it is probable that an outflow of economic resources may be required in the future to settle the obligation, such obligation being measured reliably.

The provisions' value is determined by discounting the expected future cash flows at a pre-tax rate that reflects current market conditions and the risks specific to the respective liability.

This category includes mainly provisions for employees benefits (as described in section 3x), for litigations in which the Bank is involved estimated based on the high loss probability for the Bank and provisions for abusive clauses of credit contracts (as described in section 5c).

w) Financial guarantees

Financial guarantees are contracts that require the Group and the Bank to make specific payments to reimburse the holder of the guarantee for a loss it incurs because a specified debtor fails to make payment when due in accordance with the terms of a debt instrument. Financial guarantee are measured at the higher of the loss allowance determined in accordance with IFRS 9 and the amount initially recognised less cumulative amortization recognised in profit or loss.

Financial guarantees are registered in off-balance sheet accounts, at the fair value on the date the guarantee is issued. The subsequent recognition respects the accounting principles of loans and advances to clients. Financial guarantees are initially recognized in the consolidated and separate financial statements at fair value on the date granted. After the initial recognition, the Group and Bank's obligations under such guarantees are measured at the higher of the initial measurement, less amortization calculated recognized in the income statement and the expected credit loss provision.

x) Employee benefits

(i) Short-term benefits

Short-term employee benefits include wages, indemnities and social security contributions. Short-term employee benefits are recognized as expense as the services are rendered.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

x) Employee benefits (*continued*)

(ii) Defined contribution plan

In the normal course of business, the Bank and its subsidiaries make payments to the Romanian or Republic of Moldova public pension funds on behalf of their employees for retirement, healthcare and unemployment allowances. All the employees of the Bank and its subsidiaries are members and are also legally obliged to make specific contributions (included in the social security contributions) to the Romanian public pension plan (a State defined contribution plan). All relevant contributions to the Romanian public pension plan are recognized as an expense in the income statement as incurred. The Bank and its subsidiaries do not have any further obligations.

(iii) Other benefits

The Bank and its subsidiaries from Romania are enrolled in an optional pension scheme Pillar III, within an established limit, for the employees eligible at the payment date, in accordance with the applicable Romanian legal provisions. The Bank and its subsidiaries, pursuant to the collective employment agreement, must pay the equivalent of three gross monthly salaries to the employees, upon retirement.

The debt related to this benefit scheme is calculated on an actuarial basis, considering the salary estimated at the retirement date and the number of activity years of each individual employee.

The fixed and variable remuneration may also be granted by means of a stock option plan, in the form of shares. The variable component of the total remuneration represents the remuneration that can be granted by the Bank in addition to the fixed remuneration, on condition that certain performance ratios are achieved. The variable remuneration may be granted either in cash or in the Bank's shares (TLV). In the case of the identified staff, in the establishment of the annual variable remuneration, one shall aim at limiting excessive risk-taking. A substantial part of the variable component of the total remuneration, in all cases at least 40%, is deferred for a period at least 3 years and is correlated with the activity nature, the risks and the responsibilities of the respective staff.

Based on the decision of the shareholders, the Board of Directors of the Bank decides in respect of the number of shares included in the employee loyalty plan. The fair value upon the vesting date of share-based awards - stock options – to employees is recognized as personnel expenses, with a corresponding increase in equity, over the period in which the employees become unconditionally entitled to the awards.

The amount recognized as an expense is adjusted to reflect the value of awards for which the related services and non-market related performance conditions are expected to be fulfilled, so that the amount ultimately recognized as an expense is based on the actual compensation for the services and performance conditions which are not related to the market at the vesting date.

y) Segment reporting

An operational segment is a component of the Group and of the Bank:

- that engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses related to transactions with other components of the same entity);
- whose operating results are reviewed regularly by the entity's decision maker in order to make decisions about resources to be allocated to the segment and to assess its performance;
- for which discrete financial information is available.

The Group's and the Bank's format for segment reporting is presented in Note 6.

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

z) Earnings per share

The Group and the Bank presents basic and diluted earnings per share (“EPS”) for its ordinary shares. Basic EPS is calculated by dividing the profit or loss attributable to ordinary shareholders of the Group and the Bank by the weighted average number of ordinary shares outstanding during the period. Diluted EPS is determined by adjusting the profit or loss attributable to ordinary shareholders and the weighted-average number of ordinary shares outstanding for the effects of all dilutive potential ordinary shares, which comprise convertible bonds and share options granted to employees.

aa) Treasury shares

Repurchased own equity instruments (treasury shares) are deducted from shareholders’ equity. No gain or loss is recognized in the income statement from the purchase, sale, re-issue or cancellation of the Bank’s own equity instruments.

ab) Additional equity instruments

Banca Transilvania S.A. issued additional level 1 bonds (AT1 bonds) in November 2025, with a volume of 500 million euros. AT1 bonds are unsecured and subordinated bonds, are perpetual and can only be cancelled by the issuer on predetermined dates. AT1 bonds include discretionary non-cumulative coupon payments, which allows them to be classified as equity in accordance with IFRS. If the Group or Bank’s CET 1 falls below 5.125% (i.e. if a triggering event occurs), the principal amount will be reduced. The issuer may, at its discretion, increase the amount (in whole or in part), comply with certain conditions, including the recording of a positive result and the remedy of the triggering event.

ac) New and amended IFRS Accounting Standards that are effective for the current year

In the current year, the Group and the Bank have applied amendments to IAS 21 “Lack of Exchangeability” issued by the International Accounting Standards Board (IASB) and adopted by the EU that are mandatorily effective for reporting period that begins on or after January 1, 2025. Adoption of those amendments has not had any material impact on the disclosures or on the amounts reported in these financial statements.

ad) New and revised IFRS Accounting Standards in issue and adopted by the EU but not yet effective

At the date of authorization of these financial statements, the Group and the Bank have not applied the following amendments to IFRS accounting standards that have been issued by IASB and adopted by EU but are not yet effective:

Amendments to IFRS 9 and IFRS 7 - Amendments to the Classification and Measurement of Financial Instruments issued by IASB on 30 May 2024. Amendments clarify the classification of financial assets with environmental, social and corporate governance (ESG) and similar features. Amendments also clarify the date on which a financial asset or financial liability is derecognised and introduce additional disclosure requirements regarding investments in equity instruments designated at fair value through other comprehensive income and financial instruments with contingent features.

Amendments to IFRS 1, IFRS 7, IFRS 9, IFRS 10 and IAS 7 - Annual Improvements to IFRS Accounting Standards - Volume 11 issued by IASB on 18 July 2024. These amendments include clarifications, simplifications, corrections and changes in the following areas: (a) hedge accounting by a first-time adopter (IFRS 1); (b) gain or loss on derecognition (IFRS 7); (c) disclosure of deferred difference between fair value and transaction price (IFRS 7); (d) introduction and credit risk disclosures (IFRS 7); (e) lessee derecognition of lease liabilities (IFRS 9); (f) transaction price (IFRS 9); (g) determination of a ‘de facto agent’ (IFRS 10); (h) cost method (IAS 7).

Notes to the consolidated and separate financial statements

3. Material accounting policies (*continued*)

ae) New and revised IFRS Accounting Standards in issue but not adopted by the EU

At present, IFRS as adopted by the EU do not significantly differ from IFRS adopted by the International Accounting Standards Board (IASB) except for the following new standards and amendments to the existing standards, which were not adopted by the EU as the date of authorization of these financial statements:

IFRS 18 Presentation and Disclosures in Financial Statements issued by IASB on 9 April 2024 will replace IAS 1 Presentation of Financial Statements. Standard introduces three sets of new requirements to improve companies' reporting of financial performance and give investors a better basis for analysing and comparing companies. The main changes in the new standard compared with IAS 1 comprise: (a) The introduction of categories (operating, investing, financing, income tax and discontinued operations) and defined subtotals in the statement of profit or loss; (b) the introduction of requirements to improve aggregation and disaggregation; (c) The introduction of disclosures on Management-defined Performance Measures (MPMs) in the notes to the financial statements.

IFRS 19 Subsidiaries without Public Accountability: Disclosures issued by IASB on 9 May 2024 and amended by IASB on 21 August 2025. Standard permits a subsidiary to provide reduced disclosures when applying IFRS Accounting Standards in its financial statements. IFRS 19 is optional for subsidiaries that are eligible and sets out the disclosure requirements for subsidiaries that elect to apply it.

Amendments to IAS 21 The Effects of Changes in Foreign Exchange Rates: Translation to a Hyperinflationary Presentation Currency issued by IASB on 13 November 2025. Amendments clarify how companies should translate financial statements from a non-hyperinflationary currency into a hyperinflationary one.

IFRS 14 Regulatory Deferral Accounts issued by IASB on 30 January 2014. This standard is intended to allow entities that are first-time adopters of IFRS, and that currently recognise regulatory deferral accounts in accordance with their previous GAAP, to continue to do so upon transition to IFRS.

Amendments to IFRS 10 Consolidated Financial Statements and IAS 28 Investments in Associates and Joint Ventures - Sale or Contribution of Assets between an Investor and its Associate or Joint Venture issued by IASB on 11 September 2014. The amendments address a conflict between the requirements of IAS 28 and IFRS 10 and clarify that in a transaction involving an associate or joint venture the extent of gain or loss recognition depends on whether the assets sold or contributed constitute a business.

The Group and the Bank do not expect that the adoption of the Standards listed above will have a material impact on the financial statements. Hedge accounting for a portfolio of financial assets and liabilities whose principles have not been adopted by the EU remains unregulated. According to the Group and the Bank estimates, the application of hedge accounting to a portfolio of financial assets or liabilities pursuant to IAS 39: "Financial Instruments: Recognition and Measurement" would not impact the financial statements, as the Group and the Bank do not apply hedge accounting as at December 31, 2025.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management

a) Introduction

The Group and the Bank have exposures to the following risks derived from the use of financial instruments:

- Credit Risk;
- Liquidity risk;
- Market risk;
- Operational risk;
- Climatic risk.

This note presents information about the Group's and the Bank's exposure to each of the above risks, the Group's and the Bank's objectives, policies and processes for measuring and managing risk. The most important types of financial risk to which the Group and the Bank are exposed: credit risk, liquidity risk and market risk. Market risk includes currency risk, interest rate risk and equity instruments' price risk.

Risk management is part of all decisional and business processes that take place in the Group's and the Bank's activity. The Board of Directors has the responsibility regarding the definition and monitoring of the general risk management framework for the Group and the Bank.

The risk management in Banca Transilvania S.A. is performed at 2 levels: a strategic level represented by the Board of Directors and the Leaders' Committee and an operational level represented by: Assets - Liabilities Committee ("ALCO"), Credit Policy and Approval Committee, Head Office Credit and Risk Committees (loan approval), Credit and Risk Committee of the branches/agencies, Workout Committee ("CRW"), the Bank's Leaders, Executive Directors and risk management structures within the Bank that are responsible for the definition and/or monitoring of risk management policies in their field of expertise. The Board of Directors periodically reviews the activity of these committees.

The Board of Directors monitors the compliance with the Group's and the Bank's risk policies and the adequacy of the general risk management framework in connection with the risks to which the Group and the Bank are exposed to.

The Risk Management Committee advises the Board of Directors regarding the risk appetite and the global strategy regarding the management of the current and future risks and assists the Board of Directors in overseeing the implementation of the strategy by the Leaders' Committee.

The Group's and the Bank's objective in terms of risk management is to integrate the assumed medium-risk appetite in the decision-making process, by promoting a proper alignment between assumed risks, available capital and performance targets, while also considering the tolerance to financial and non-financial risks.

In determining the risk appetite and tolerance, the Group and the Bank take into consideration all the material risks it is exposed to, given its specific activity and being mainly influenced by the credit risk.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

a) Introduction (continued)

Risk management policies and systems are reviewed regularly (mainly annually) with the participation of the Leaders' Committee and the responsible persons from different Departments involved, in order to reflect the changes in the market conditions, the products and services provided.

The crisis simulation program (stress testing) is an integral part of the risk management framework and of the internal risk capital adequacy assessment process. The Bank reviews the crisis simulation program regularly, at least semi-annually, and assesses its effectiveness and adequacy to the defined purposes/objectives.

b) Credit risk

The Group's and the Bank's Audit Committees report to the Board of Directors and are responsible for monitoring compliance with the Bank's risk management procedures. The Audit Committees is assisted in these functions by the Internal Audit. The Internal Audit department undertakes both regular and ad-hoc reviews of risk management controls and procedures. The results of which are reported to the Audit Committee.

The Board of Directors and the Management of the subsidiaries which constitute the Group have responsibilities regarding significant risk management in correlation with their specific business characteristics and applicable laws and regulations.

(i) Credit risk management

The objective of the Group and of the Bank as concerns the management of credit risk is to ensure a balanced distribution of capital among various business lines, which allows the achievement of comfortable RAROC (Risk-adjusted return on capital) levels considering the proportion of the lending activity in the Bank's assets and its commercial bank profile.

The Group and the Bank are exposed to credit risk through the trading, lending, investment and guarantee issuing activities. The credit risk arising from trading and investment activities is mitigated by selecting only counterparties with good credit standing and by monitoring their activities and ratings, by using exposure limits and, when necessary, by requesting collaterals. The Group's and the Bank's primary exposure to credit risk arises from loans and advances to customers.

The amount of credit risk exposure is represented by the carrying amounts of the assets on the consolidated and separate statement of financial position. The Group and the Bank are exposed to credit risk derived from other financial assets, including derivative instruments and debt investments; the current credit risk exposure in respect of these instruments is equal to the carrying amount of the assets in the consolidated and separate statement of financial position. In addition, the Group and the Bank are exposed to off balance sheet credit risk from credit and guarantee commitments (see Note 41). In order to minimize the risk, the Group and the Bank have defined procedures to assess customers before loan granting, to monitor their capacity to reimburse the principal and related interest during the entire loan period and to define exposure limits.

In addition, the Group and the Bank have implemented procedures for monitoring the risks related to the loan portfolio and have defined exposure limits by types of loans, economic sectors, types of collateral, maturity, etc. The Board of Directors has assigned the responsibility for credit risk management to the Leaders' Committee, Credit Policy and Approval Committee, Head Office Credit and Risk committees (credit approval), Remedy and Workout Committee at HQ level and Credit and Risk Committees in branches/ agencies.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(i) Credit risk management (continued)

Moreover, several departments with risk attributions operate within the Bank, reporting to the Head Office Committees with respect to:

- The analysis, assessment and monitoring of specific risks within the lending activity;
- The risk analysis of the loan portfolio/large exposures, with recommendations submitted to the Leaders' Committee/Board of Directors;
- Monitoring the application of internal policies specific to the lending activities;
- Elaborating proposals for the reduction of specific risks, in order to maintain healthy standards in the lending activity;
- Elaborating an efficient credit risk rating process capable of rendering the variable level, nature and determining factors related to credit risk, which could occur in time, so as to ensure in a reasonable manner that all the credit exposures are properly monitored and the ECL-related allowances are properly measured;
- Monitoring the granted loans, in accordance with the client's financial performance, loan type, collateral type and debt service, in accordance with the internal lending policies and procedures;
- The approval and monitoring of ratios related to the establishment/modification of the branches' lending competences, according to specific internal policies;
- The periodic reviews and recommendations to the Leaders' Committee on the risk levels accepted by the Group and the Bank;
- Identifying, monitoring and controlling the credit risk at branch level and subsidiary level;
- The risk analysis with respect to new lending products/changes of loan products, including recommendations to the involved Departments;
- The periodical reporting to the Deputy CEO - Chief Risk Officer, Leaders' Committee, Risk Management Committee and the Board of Directors on the evolution of risks (the implications of risk correlation, forecasts etc.);
- Elaborating the methodology for the early identification of credit risks deterioration (early warning system);
- Elaborating processes to be systematically and consistently applied in order to establish proper allowances for the loss in accordance with the applicable accounting regulations in the field of credit risk;
- Establishing and reviewing the back-testing methodology regarding the adequacy of the default probability parameter, the non-repayment status and the provision level related to the Bank's loan portfolio.

Each branch/agency implements at local level the Group's and the Bank's policies and regulations regarding credit risk, having loan approval competences established by the Leaders' Committee. Each branch/agency is responsible for the quality and performance of its loan portfolio and for monitoring and controlling all credit risks in its portfolios, including those subjects to Head Office approval. The Internal Audit Department and the Internal Control Department carry out periodical reviews of the branches and agencies.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure

Concentrations of credit risk that arise from financial instruments exist for groups of counterparties when they have similar economic characteristics that would cause their ability to meet contractual obligations to be similarly affected by changes in economic or other conditions. The major concentrations of credit risk arise by single debtor counterparty and by type of customer in relation to the Group's and the Bank's loans and advances, loan commitments, finance lease and guarantees issued. The table below contains the on-balance and off-balance sheet exposures (loans and advances to customers and financial lease receivables), split by economic sector concentration:

	Group		Bank	
	2025	2024 (*)	2025	2024 (*)
Retail	39.77%	39.44%	38.44%	37.70%
Government institutions	9.40%	9.41%	10.16%	11.24%
Trading	10.13%	11.05%	8.50%	9.69%
Financial institutions and insurance companies	1.60%	1.70%	7.93%	8.18%
Production	7.07%	7.57%	6.68%	7.19%
Constructions	5.67%	5.34%	5.10%	4.55%
Real estate	4.85%	4.65%	5.08%	3.68%
Services	5.06%	4.94%	3.73%	3.69%
Agriculture and Forestry	3.84%	4.57%	3.62%	4.02%
Transportation	4.02%	4.04%	3.08%	3.12%
Energy industry	2.77%	2.53%	2.87%	2.47%
Health and social care services	1.74%	1.82%	1.65%	1.98%
Self-employed	1.76%	1.54%	1.09%	1.22%
Extractive industry	0.85%	0.16%	0.89%	0.10%
Telecommunications	0.80%	0.27%	0.73%	0.29%
Others	0.36%	0.64%	0.25%	0.66%
Chemical industry	0.13%	0.18%	0.11%	0.13%
Education	0.16%	0.13%	0.09%	0.08%
Fishing	0.02%	0.02%	0.02%	0.02%
	100%	100%	100%	100%

(*) To ensure comparability of classification by economic sectors, the data presented as of December 31, 2024, have been restated in accordance with the new version of the National Economy Activity Classification CAEN Rev. 3 (see note 2e(b)).

The table below presents the concentration by class of the on-balance sheet exposures related to the Bank's and Group's loan and leasing portfolio:

RON thousand	Group		Bank	
	2025	2024	2025	2024
Corporate and public institutions	42,984,650	39,410,671	49,363,554	40,584,047
Small and medium enterprises	14,021,007	13,400,981	13,323,654	11,695,683
Consumer loans and card loans granted to retail customers	19,097,139	16,522,596	17,926,843	14,520,308
Mortgage loans	25,685,500	24,083,037	24,941,204	19,303,938
Loans and finance lease receivables granted by non-banking financial institutions	11,471,720	8,472,986	-	-
Other	84,232	85,559	76,124	78,423
Total loans and advances to customers and financial lease receivables before impairment allowance	113,344,248	101,975,830	105,631,379	86,182,399
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(6,634,342)	(5,605,968)	(5,940,298)	(4,792,410)
Total loans and advances to customers and financial lease receivables net of impairment allowance	106,709,906	96,369,862	99,691,081	81,389,989

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure (continued)

At December 31, 2025, the total on-balance and irrevocable off-balance sheet exposure was of RON 120,838,436 thousand (2024: RON 108,846,295 thousand) for the Group and RON 111,725,380 thousand (2024: RON 89,925,528 thousand) for the Bank.

The Group and the Bank hold guarantees for loans and advances to customers in the form of pledge over cash deposits, mortgage over property, guarantees and other pledges over equipment and/or receivables.

The estimates of fair value are based on the collateral value assessed at the date of lending, except when a loan is individually assessed subsequently. Collateral is not held over loans and advances to banks.

The Group and the Bank use risk grades for loans both individually and collectively assessed. According to the Group's and the Bank's policies, a loan can be assigned a corresponding risk grade based on a 6-level classification: very low risk, low risk, moderate risk, sensitive risk, high risk and defaulted.

The classification of loans into groups is mainly based on the client scoring systems of the Group and the Bank, where performing exposure (classified below in "very low risk", "low risk", "moderate risk", "sensitive risk", "high risk" categories) are within 1-9 grade (for companies) or 1-8 grade (for retail), and for nonperforming/ defaulted exposure within 10-12 grade for companies or 9 grade for retail.

Very low risk: financial instruments with low default risk, judged to be of the highest quality and the borrower has strong capacity to meet contractual cash flow obligations in the near terms.

Low risk: financial instruments are judged to be of good quality and are subject to low credit risk. The borrower has strong capacity to meet contractual cash flow obligations.

Moderate risk: financial instruments are judged to be of standard quality. The borrower has an average solvency and has the ability to meet the debt payment obligations, but may be sensitive to adverse changes in economic conditions.

Sensitive risk: financial instruments are judged to be of substandard quality and the borrower presents a financial deterioration, but has sufficient cash flows to meet the debt payment obligations; may be more vulnerable to negative economic conditions than the moderate risk category.

High risk: the financial instruments are judged to be of doubtful quality. The borrower presents an increase in credit risk or financial deterioration and is vulnerable to negative economic condition. Repayment of debt obligation on time is uncertain and depends on an economic and financial favorable environment to avoid the entering in default state.

Defaulted: financial instruments where the borrowers are not fulfilling their financial commitments to repay in accordance with their contractual agreements. Further information on non-performing loans can be found below on paragraph "*Definition of default and credit-impaired assets*".

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure (continued)

Synthetic securitisation activity related to the loan portfolio

Banca Transilvania (the Bank) concluded on December 22, 2023 a non-STS synthetic securitisation transaction with the European Investment Fund (EIF) and the European Investment Bank (EIB), effective from March 31, 2024. The synthetic securitization transaction is structured on a portfolio of loans granted to legal entities, initial securitisation in amount of RON 2,027.5 million.

During the transaction, the Bank retains at least 5% of the exposure of each loan included in the securitization portfolio.

The credit risk of the mezzanine and senior tranches is transferred to the EIF, while the credit risk of the junior tranche, representing 1.6% from initial portfolio, is assumed by the Bank.

EIF - as Guarantor, issued an irrevocable and unconditional Financial Guarantee in favour of Banca Transilvania S.A. (the Beneficiary) to guarantee the coverage of the loss related to each reference obligation, should such loss be allocated to the mezzanine and senior tranche, initial total amount of RON 1,995.1 million which represents 98.4% of securitised portfolio, after exceeding the losses retained by the Bank related to junior tranche and synthetic excess spread (cumulatively 2.8% of the total volume of the initial portfolio).

The financial guarantee is treated separately and does not result in any changes to the financial characteristics of the loan, representing a distinct mechanism for covering credit risk. As a result, it does not impact the calculation of expected credit losses.

The scheduled maturity date of the guarantee is December 31, 2039.

The EIF guarantee is counter-guaranteed by the EIB through a back-to-back hedge arrangement.

The Bank's objective is to support the real economy by transferring the benefits of more efficient use of the Bank's capital to the end-customer, in the form of a lower cost of loan. To this end, Banca Transilvania S.A. has concluded with the EIB a Mezzanine and a Senior Retrocession Agreement and Commitment Agreement for increased support for SMEs and Midcaps, to supply new lending of more than RON 2.64 billion, including also projects aligned with climate action and environmental sustainability, thus supporting the transition to a low-carbon economy.

The below stated amounts represent the securitized portfolio as of December 31, 2025:

RON million

	Date of contract	End of maturity	Portfolio type	Maximum amount of securitized portfolio	Securitized portfolio (Nb. Loans)	Outstanding amount
EIF synthetic securitization	2023	2039	SME & CO	2,027.5	15,956	2,010.16
Senior tranche				1,670.67		1,656.14
Mezanin tranche				324.40		321.58
Junior tranche				32.44		32.44

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure (continued)

At the end of the financial year, the losses were fully allocated to the excess synthetic spread. According to the contract, the Bank will be able to benefit from reimbursements in the future for the losses associated with the defaulted reference obligations, but this benefit will only become realizable after the complete allocation of the losses to the excess synthetic spread and junior tranche. In accordance with the definition of a contingent asset, the bank considers that, although there is a possibility that an economic resource may be received in the future under the terms of the financial guarantee contract and the losses to be reimbursed, the realization of this asset remains uncertain. It depends on the allocation of losses to the excess synthetic spread and junior tranche.

The bank has not recognized this asset in the financial statements as of December 31, 2025, given the uncertainty regarding the timing and conditions under which the reimbursement will take place. The asset will be recognized only when there is virtually certain that the reimbursement will be made.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The exposures to credit risk for loans and advances to customers and financial lease receivables at Group consolidated level, as at December 31, 2025, are presented below:

At amortized cost <i>In RON thousand</i>	Assets for which the credit risk has not increased significantly since the initial recognition (Stage 1)	Assets for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Assets impaired at the reporting date (Stage 3)	Assets impaired on initial recognition (POCI)	Total 2025
Corporate and public institutions	35,088,602	6,636,184	1,062,270	197,594	42,984,650
Small and medium enterprises	10,834,080	2,271,423	849,476	66,028	14,021,007
Consumer loans and card loans granted to retail customers	14,974,258	3,105,099	895,241	122,541	19,097,139
Mortgage loans	22,766,492	2,608,468	196,503	114,037	25,685,500
Loans and finance lease receivables granted to non-banking financial institutions	8,197,923	2,558,510	592,334	122,953	11,471,720
Other	44	65,582	18,505	101	84,232
Total loans and advances to customers and financial lease receivables before impairment allowance	91,861,399	17,245,266	3,614,329	623,254	113,344,248
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,817,432)	(2,268,150)	(2,449,522)	(99,238)	(6,634,342)
Total loans and advances to customers and financial lease receivables net of impairment allowance	90,043,967	14,977,116	1,164,807	524,016	106,709,906

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2025
Corporate and public institutions	15,644,100	11,396,708	7,612,395	435,399	35,088,602
Small and medium enterprises	4,046,395	5,504,070	1,283,615	-	10,834,080
Consumer loans and card loans granted to retail customers	7,652,227	6,501,663	789,651	30,717	14,974,258
Mortgage loans	11,691,710	10,160,241	743,762	170,779	22,766,492
Loans and finance lease receivables granted by non-banking financial institutions	5,536,495	2,661,265	163	-	8,197,923
Other	-	-	12	32	44
Total loans and advances to customers and financial lease receivables before impairment allowance	44,570,927	36,223,947	10,429,598	636,927	91,861,399
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(259,534)	(762,335)	(699,716)	(95,847)	(1,817,432)
Total loans and advances to customers and financial lease receivables net of impairment allowance	44,311,393	35,461,612	9,729,882	541,080	90,043,967

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	0 days	1-15 days	16-30 days	Total 2025
Corporate and public institutions	35,076,993	11,258	351	35,088,602
Small and medium enterprises	10,752,942	79,509	1,629	10,834,080
Consumer loans and card loans granted to retail customers	14,690,981	215,133	68,144	14,974,258
Mortgage loans	22,280,206	379,420	106,866	22,766,492
Loans and finance lease receivables granted by non-banking financial institutions	8,093,230	60,468	44,225	8,197,923
Other	44	-	-	44
Total loans and advances to customers and financial lease receivables before impairment allowance	90,894,396	745,788	221,215	91,861,399
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,790,437)	(21,513)	(5,482)	(1,817,432)
Total loans and advances to customers and financial lease receivables net of impairment allowance	89,103,959	724,275	215,733	90,043,967

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management *(continued)*

b) Credit risk *(continued)*

(ii) Credit risk exposure (continued)

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	Low-moderate risk	Sensitive risk	High risk	Total 2025
Corporate and public institutions	5,057,417	1,220,048	358,719	6,636,184
Small and medium enterprises	1,235,807	645,486	390,130	2,271,423
Consumer loans and card loans granted to retail customers	1,812,814	890,368	401,917	3,105,099
Mortgage loans	1,972,562	436,857	199,049	2,608,468
Loans and finance lease receivables granted by non-banking financial institutions	2,484,693	54,846	18,971	2,558,510
Other	8,166	57,387	29	65,582
Total loans and advances to customers and financial lease receivables before impairment allowance	12,571,459	3,304,992	1,368,815	17,245,266
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(955,037)	(803,542)	(509,571)	(2,268,150)
Total loans and advances to customers and financial lease receivables net of impairment allowance	11,616,422	2,501,450	859,244	14,977,116

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	0-30 days	31-60 days	61-90 days	Total 2025
Corporate and public institutions	6,614,341	14,488	7,355	6,636,184
Small and medium enterprises	2,160,105	90,403	20,915	2,271,423
Consumer loans and card loans granted to retail customers	2,968,468	107,123	29,508	3,105,099
Mortgage loans	2,472,233	122,795	13,440	2,608,468
Loans and finance lease receivables granted by non-banking financial institutions	2,484,693	48,094	25,723	2,558,510
Other	65,527	26	29	65,582
Total loans and advances to customers and financial lease receivables before impairment allowance	16,765,367	382,929	96,970	17,245,266
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(2,128,109)	(102,201)	(37,840)	(2,268,150)
Total loans and advances to customers and financial lease receivables net of impairment allowance	14,637,258	280,728	59,130	14,977,116

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances, lease receivables granted to clients, impaired, Stage 3

In RON thousand

	0-30 days	31-60 days	61-90 days	Over 90 days	Total 2025
Corporate and public institutions	554,746	55,687	32,704	419,133	1,062,270
Small and medium enterprises	232,332	72,193	41,996	502,955	849,476
Consumer loans and card loans granted to retail customers	194,427	70,031	38,528	592,255	895,241
Mortgage loans	88,080	33,222	16,978	58,223	196,503
Loans and finance lease receivables granted by non-banking financial institutions	202,588	53,356	28,002	308,388	592,334
Other	16,382	8	4	2,111	18,505
Total loans and advances to customers and financial lease receivables before impairment allowance	1,288,555	284,497	158,212	1,883,065	3,614,329
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(754,971)	(160,127)	(87,851)	(1,446,573)	(2,449,522)
Total loans and advances to customers and financial lease receivables net of impairment allowance	533,584	124,370	70,361	436,492	1,164,807

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The exposures to credit risk for loans and advances to customers and financial lease receivables at Group consolidated level, as at December 31, 2024, are presented below:

At amortized cost	Assets for which the credit risk has not increased significantly since the initial recognition (Stage 1)	Assets for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Assets impaired at the reporting date (Stage 3)	Assets impaired on initial recognition (POCI)	Total 2024
<i>In RON thousand</i>					
Corporate and public institutions	34,168,153	4,386,972	663,450	192,096	39,410,671
Small and medium enterprises	10,223,433	2,376,096	712,965	88,487	13,400,981
Consumer loans and card loans granted to retail customers	12,848,451	2,657,086	884,381	132,678	16,522,596
Mortgage loans	21,053,574	2,718,801	189,748	120,914	24,083,037
Loans and finance lease receivables granted to non-banking financial institutions	6,152,668	1,599,722	603,852	116,744	8,472,986
Other	23	65,385	20,062	89	85,559
Total loans and advances to customers and financial lease receivables before impairment allowance	84,446,302	13,804,062	3,074,458	651,008	101,975,830
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,550,102)	(2,029,087)	(1,959,456)	(67,323)	(5,605,968)
Total loans and advances to customers and financial lease receivables net of impairment allowance	82,896,200	11,774,975	1,115,002	583,685	96,369,862

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2024
Corporate and public institutions	14,412,553	12,503,935	7,035,492	216,173	34,168,153
Small and medium enterprises	3,598,810	5,239,525	1,335,128	49,970	10,223,433
Consumer loans and card loans granted to retail customers	6,631,793	5,210,440	892,968	113,250	12,848,451
Mortgage loans	10,276,244	9,249,127	1,279,195	249,008	21,053,574
Loans and finance lease receivables granted by non-banking financial institutions	4,921,903	1,230,140	625	-	6,152,668
Other	-	-	2	21	23
Total loans and advances to customers and financial lease receivables before impairment allowance	39,841,303	33,433,167	10,543,410	628,422	84,446,302
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(257,226)	(707,309)	(551,134)	(34,433)	(1,550,102)
Total loans and advances to customers and financial lease receivables net of impairment allowance	39,584,077	32,725,858	9,992,276	593,989	82,896,200

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	0 days	1-15 days	16-30 days	Total 2024
Corporate and public institutions	34,137,272	30,881	-	34,168,153
Small and medium enterprises	10,131,951	85,460	6,022	10,223,433
Consumer loans and card loans granted to retail customers	12,522,693	257,962	67,796	12,848,451
Mortgage loans	20,570,628	408,903	74,043	21,053,574
Loans and finance lease receivables granted by non-banking financial institutions	5,870,233	108,458	173,977	6,152,668
Other	23	-	-	23
Total loans and advances to customers and financial lease receivables before impairment allowance	83,232,800	891,664	321,838	84,446,302
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,502,921)	(26,450)	(20,731)	(1,550,102)
Total loans and advances to customers and financial lease receivables net of impairment allowance	81,729,879	865,214	301,107	82,896,200

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management *(continued)*

b) Credit risk *(continued)*

(ii) Credit risk exposure (continued)

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	Low-moderate risk	Sensitive risk	High risk	Total 2024
Corporate and public institutions	2,723,325	1,228,433	435,214	4,386,972
Small and medium enterprises	1,376,313	622,720	377,063	2,376,096
Consumer loans and card loans granted to retail customers	1,517,173	747,186	392,727	2,657,086
Mortgage loans	2,112,245	378,472	228,084	2,718,801
Loans and finance lease receivables granted by non-banking financial institutions	1,513,121	72,215	14,386	1,599,722
Other	7,171	58,214	-	65,385
Total loans and advances to customers and financial lease receivables before impairment allowance	9,249,348	3,107,240	1,447,474	13,804,062
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(807,988)	(732,026)	(489,073)	(2,029,087)
Total loans and advances to customers and financial lease receivables net of impairment allowance	8,441,360	2,375,214	958,401	11,774,975

Gross value of loans and advances, lease receivables granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	0-30 days	31-60 days	61-90 days	Total 2024
Corporate and public institutions	4,365,189	21,783	-	4,386,972
Small and medium enterprises	2,257,555	99,408	19,133	2,376,096
Consumer loans and card loans granted to retail customers	2,538,542	96,952	21,592	2,657,086
Mortgage loans	2,594,838	105,050	18,913	2,718,801
Loans and finance lease receivables granted by non-banking financial institutions	1,513,121	66,499	20,102	1,599,722
Other	65,294	80	11	65,385
Total loans and advances to customers and financial lease receivables before impairment allowance	13,334,539	389,772	79,751	13,804,062
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,890,745)	(108,404)	(29,938)	(2,029,087)
Total loans and advances to customers and financial lease receivables net of impairment allowance	11,443,794	281,368	49,813	11,774,975

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances, lease receivables granted to clients, impaired, Stage 3

In RON thousand

	0-30 days	31-60 days	61-90 days	Over 90 days	Total 2024
Corporate and public institutions	385,359	12,396	19,279	246,416	663,450
Small and medium enterprises	264,858	61,246	36,718	350,143	712,965
Consumer loans and card loans granted to retail customers	201,269	71,567	40,559	570,986	884,381
Mortgage loans	89,343	28,755	19,511	52,139	189,748
Loans and finance lease receivables granted by non-banking financial institutions	289,909	63,057	30,390	220,496	603,852
Other	18,131	6	5	1,920	20,062
Total loans and advances to customers and financial lease receivables before impairment allowance	1,248,869	237,027	146,462	1,442,100	3,074,458
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(651,743)	(109,648)	(74,565)	(1,123,500)	(1,959,456)
Total loans and advances to customers and financial lease receivables net of impairment allowance	597,126	127,379	71,897	318,600	1,115,002

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The exposures to credit risk for loans and advances to customers at Bank level, as at December 31, 2025, are presented below:

At amortized cost	Assets for which the credit risk has not increased significantly since the initial recognition (Stage 1)	Assets for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Assets impaired at the reporting date (Stage 3)	Assets impaired on initial recognition (POCI)	Total 2025
<i>In RON thousand</i>					
Corporate and public institutions	41,548,759	6,580,678	1,036,522	197,595	49,363,554
Small and medium enterprises	10,208,127	2,218,043	831,456	66,028	13,323,654
Consumer loans and card loans granted to retail customers	13,899,554	3,044,336	860,414	122,539	17,926,843
Mortgage loans	22,059,463	2,576,868	190,836	114,037	24,941,204
Other	42	57,534	18,446	102	76,124
Total loans and advances to customers and financial lease receivables before impairment allowance	87,715,945	14,477,459	2,937,674	500,301	105,631,379
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,778,841)	(2,054,135)	(2,042,731)	(64,591)	(5,940,298)
Total loans and advances to customers and financial lease receivables net of impairment allowance	85,937,104	12,423,324	894,943	435,710	99,691,081

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2025
Corporate and public institutions	22,962,834	10,538,131	7,612,395	435,399	41,548,759
Small and medium enterprises	4,046,395	4,878,118	1,283,614	-	10,208,127
Consumer loans and card loans granted to retail customers	7,652,227	5,426,959	789,651	30,717	13,899,554
Mortgage loans	11,691,710	9,453,212	743,762	170,779	22,059,463
Other	-	-	11	31	42
Total loans and advances to customers and financial lease receivables before impairment allowance	46,353,166	30,296,420	10,429,433	636,926	87,715,945
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(379,977)	(603,306)	(699,711)	(95,847)	(1,778,841)
Total loans and advances to customers and financial lease receivables net of impairment allowance	45,973,189	29,693,114	9,729,722	541,079	85,937,104

Gross value of loans and advances granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	0 days	1-15 days	16-30 days	Total 2025
Corporate and public institutions	41,539,845	8,563	351	41,548,759
Small and medium enterprises	10,145,011	61,487	1,629	10,208,127
Consumer loans and card loans granted to retail customers	13,638,666	197,135	63,753	13,899,554
Mortgage loans	21,579,104	373,493	106,866	22,059,463
Other	42	-	-	42
Total loans and advances to customers and financial lease receivables before impairment allowance	86,902,668	640,678	172,599	87,715,945
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,761,549)	(13,489)	(3,803)	(1,778,841)
Total loans and advances to customers and financial lease receivables net of impairment allowance	85,141,119	627,189	168,796	85,937,104

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management *(continued)*

b) Credit risk *(continued)*

(ii) Credit risk exposure (continued)

Gross value of loans and advances granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	Low-moderate risk	Sensitive risk	High risk	Total 2025
Corporate and public institutions	5,001,853	1,220,105	358,720	6,580,678
Small and medium enterprises	1,184,583	645,486	387,974	2,218,043
Consumer loans and card loans granted to retail customers	1,764,889	877,530	401,917	3,044,336
Mortgage loans	1,945,579	432,240	199,049	2,576,868
Other	118	57,386	30	57,534
Total loans and advances to customers and financial lease receivables before impairment allowance	9,897,022	3,232,747	1,347,690	14,477,459
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(765,934)	(786,228)	(501,973)	(2,054,135)
Total loans and advances to customers and financial lease receivables net of impairment allowance	9,131,088	2,446,519	845,717	12,423,324

Gross value of loans and advances granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	0-30 days	31-60 days	61-90 days	Total 2025
Corporate and public institutions	6,558,835	14,488	7,355	6,580,678
Small and medium enterprises	2,108,881	88,720	20,442	2,218,043
Consumer loans and card loans granted to retail customers	2,920,543	99,030	24,763	3,044,336
Mortgage loans	2,445,250	118,804	12,814	2,576,868
Other	57,480	26	28	57,534
Total loans and advances to customers and financial lease receivables before impairment allowance	14,090,989	321,068	65,402	14,477,459
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,939,063)	(87,670)	(27,402)	(2,054,135)
Total loans and advances to customers and financial lease receivables net of impairment allowance	12,151,926	233,398	38,000	12,423,324

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management *(continued)*

b) Credit risk *(continued)*

(ii) Credit risk exposure (continued)

Gross value of loans and advances granted to clients, impaired, Stage 3 <i>In RON thousand</i>	0-30 days	31-60 days	61-90 days	over 90 days	Total 2025
Corporate and public institutions	554,747	55,687	32,704	393,384	1,036,522
Small and medium enterprises	227,516	71,510	41,537	490,893	831,456
Consumer loans and card loans granted to retail customers	189,766	67,616	36,380	566,652	860,414
Mortgage loans	85,722	31,621	15,970	57,523	190,836
Other	16,380	9	5	2,052	18,446
Total loans and advances to customers and financial lease receivables before impairment allowance	1,074,131	226,443	126,596	1,510,504	2,937,674
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(673,153)	(138,954)	(72,149)	(1,158,475)	(2,042,731)
Total loans and advances to customers and financial lease receivables net of impairment allowance	400,978	87,489	54,447	352,029	894,943

The exposures to credit risk for loans and advances to customers at Bank level, as at December 31, 2024, are presented below:

At amortized cost	Assets for which the credit risk has not increased significantly since the initial recognition (Stage 1)	Assets for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Assets impaired at the reporting date (Stage 3)	Assets impaired on initial recognition (POCI)	Total 2024
<i>In RON thousand</i>					
Corporate and public institutions	35,904,623	4,053,479	562,583	63,362	40,584,047
Small and medium enterprises	8,828,433	2,230,604	622,735	13,911	11,695,683
Consumer loans and card loans granted to retail customers	11,038,655	2,582,650	833,561	65,442	14,520,308
Mortgage loans	16,505,280	2,612,333	158,561	27,764	19,303,938
Other	23	58,310	20,004	86	78,423
Total loans and advances to customers and financial lease receivables before impairment allowance	72,277,014	11,537,376	2,197,444	170,565	86,182,399
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,420,521)	(1,818,407)	(1,526,282)	(27,200)	(4,792,410)
Total loans and advances to customers and financial lease receivables net of impairment allowance	70,856,493	9,718,969	671,162	143,365	81,389,989

The explanatory notes to the financial statements from page 11 to page 184 are an integral part of these financial statements.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2024
Corporate and public institutions	20,064,256	10,521,327	5,287,775	31,265	35,904,623
Small and medium enterprises	3,512,823	4,296,526	1,019,080	4	8,828,433
Consumer loans and card loans granted to retail customers	6,526,667	3,847,013	650,072	14,903	11,038,655
Mortgage loans	9,991,670	6,016,319	427,821	69,470	16,505,280
Other	-	-	2	21	23
Total loans and advances to customers and financial lease receivables before impairment allowance	40,095,416	24,681,185	7,384,750	115,663	72,277,014
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(347,460)	(566,352)	(496,683)	(10,026)	(1,420,521)
Total loans and advances to customers and financial lease receivables net of impairment allowance	39,747,956	24,114,833	6,888,067	105,637	70,856,493

Gross value of loans and advances granted to clients, not impaired, Stage 1 <i>In RON thousand</i>	0 days	1-15 days	16-30 days	Total 2024
Corporate and public institutions	35,900,394	4,229	-	35,904,623
Small and medium enterprises	8,772,630	51,897	3,906	8,828,433
Consumer loans and card loans granted to retail customers	10,819,347	166,720	52,588	11,038,655
Mortgage loans	16,224,220	228,364	52,696	16,505,280
Other	23	-	-	23
Total loans and advances to customers and financial lease receivables before impairment allowance	71,716,614	451,210	109,190	72,277,014
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,407,168)	(10,088)	(3,265)	(1,420,521)
Total loans and advances to customers and financial lease receivables net of impairment allowance	70,309,446	441,122	105,925	70,856,493

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management *(continued)*

b) Credit risk *(continued)*

(ii) Credit risk exposure (continued)

Gross value of loans and advances granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	Low-moderate risk	Sensitive risk	High risk	Total 2024
Corporate and public institutions	2,637,375	1,133,747	282,357	4,053,479
Small and medium enterprises	1,280,452	599,557	350,595	2,230,604
Consumer loans and card loans granted to retail customers	1,501,082	734,119	347,449	2,582,650
Mortgage loans	2,106,874	361,121	144,338	2,612,333
Other	96	58,214	-	58,310
Total loans and advances to customers and financial lease receivables before impairment allowance	7,525,879	2,886,758	1,124,739	11,537,376
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(677,468)	(693,898)	(447,041)	(1,818,407)
Total loans and advances to customers and financial lease receivables net of impairment allowance	6,848,411	2,192,860	677,698	9,718,969

Gross value of loans and advances granted to clients, not impaired, Stage 2 <i>In RON thousand</i>	0-30 days	31-60 days	61-90 days	Total 2024
Corporate and public institutions	4,041,523	11,956	-	4,053,479
Small and medium enterprises	2,121,046	91,172	18,386	2,230,604
Consumer loans and card loans granted to retail customers	2,479,675	83,785	19,190	2,582,650
Mortgage loans	2,522,120	79,662	10,551	2,612,333
Other	58,218	80	12	58,310
Total loans and advances to customers and financial lease receivables before impairment allowance	11,222,582	266,655	48,139	11,537,376
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(1,711,297)	(85,451)	(21,659)	(1,818,407)
Total loans and advances to customers and financial lease receivables net of impairment allowance	9,511,285	181,204	26,480	9,718,969

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

Gross value of loans and advances granted to clients, impaired, Stage 3 <i>In RON thousand</i>	0-30 days	31-60 days	61-90 days	over 90 days	Total 2024
Corporate and public institutions	333,113	9,849	9,619	210,002	562,583
Small and medium enterprises	208,870	55,635	29,680	328,550	622,735
Consumer loans and card loans granted to retail customers	187,657	65,268	34,750	545,886	833,561
Mortgage loans	78,181	23,156	12,782	44,442	158,561
Other	18,131	6	5	1,862	20,004
Total loans and advances to customers and financial lease receivables before impairment allowance	825,952	153,914	86,836	1,130,742	2,197,444
Allowances for impairment losses on loans and advances to customers, financial lease receivables	(496,769)	(82,651)	(49,641)	(897,221)	(1,526,282)
Total loans and advances to customers and financial lease receivables net of impairment allowance	329,183	71,263	37,195	233,521	671,162

As at December 31, 2025, the financial assets measured at fair value through other items of comprehensive income include treasury bills and bonds issued by the Ministry of Finance of Romania, with BBB- rating, bonds issued by the Government of the Republic of Moldova with a sovereign rating B-, bonds issued by the Government of Italy with a rating of BBB-, bonds issued by the Government of Germany with a rating of AAA, bonds issued by the Government of Hungary with a rating of BBB, bonds issued by the Government of Spain with a rating of A-, bonds issued by municipalities with a rating of BBB-, bonds issued by credit institutions and other financial institutions rated A, A-, A+, AAA, BB, BBB, BBB+ and DD (Note 24).

As at December 31, 2024, the financial assets measured at fair value through other items of comprehensive income include treasury bills and bonds issued by the Ministry of Finance of Romania, with BBB- rating, bonds issued by the Government of the Republic of Moldova with a sovereign rating B-, bonds issued by the Government of Italy with a rating of BBB-, bonds issued by the Government of Germany with a rating of AAA, bonds issued by the Government of Hungary with a rating of BBB, bonds issued by municipalities with a rating of BBB- and BB+, bonds issued by credit institutions and other financial institutions rated A, A-, A+, AAA, BB+, BBB, BBB+ and DD (Note 24).

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure (continued)

Impairment allowances

The Group and the Bank calculate the expected credit loss (“ECL”) related to the loans and advances to customers, financial lease receivables, debt instruments measured at amortized cost, irrevocable loan commitments and financial guarantee contracts. Internal framework is designed considering IFRS 9 regulation as mentioned in the further sections.

Details regarding the movement in provisions can be seen in Note 22 and Note 23, as the case may be.

Loan collateral policy

The Group and the Bank hold collateral against loans and advances to customers in the form of mortgages over land and buildings, pledges on equipment and inventories, letter of guarantees, insurance policies and other guarantees. The Group and the Bank have ownership rights over these guarantees until the end of the contract. The estimates of fair value are based on the collateral value assessed on the loan granting date and periodically updated during the lifespan of the loan, at least annually, regardless of the collateral type.

The pledges presented below comprise pledges without dispossession and do not include guarantees related to the lease contracts granted by BT Leasing Transilvania IFN S.A..

Property includes land, residential and commercial buildings, "Security interests in movable property" includes pledges on movable assets (cars, equipment, inventories etc.) and the category “Other collateral” includes collateral deposits and other guarantees received.

An analysis of the collateral values split per types of loans and advances and lease receivables granted to customers is presented below:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
<i>Collaterals related to loans and lease receivables with low- moderate, sensitive and high risk and impaired loans:</i>				
Property	19,107,701	12,144,138	18,862,106	11,323,343
Security interests in movable property	2,327,073	1,400,430	2,026,287	1,219,880
Other collateral	2,027,030	2,692,158	1,900,198	2,449,193
Total	23,461,804	16,236,726	22,788,591	14,992,416
<i>Collaterals related to loans and lease receivables with very low risk, low risk, moderate and sensitive:</i>				
Property	79,231,054	63,910,623	77,757,256	55,295,604
Security interests in movable property	4,848,069	3,428,608	4,117,270	3,130,370
Other collateral	3,651,152	6,908,286	3,046,238	5,769,602
Total	87,730,275	74,247,517	84,920,764	64,195,576
Total	111,192,079	90,484,243	107,709,355	79,187,992

The effect of the Group’s and Bank’s collateral is presented separately highlighting the collateral values, as follows:

- (i) for those assets in which the market value of collateral is equal to or higher than the book value of the asset (“over-collateralization of assets”);
- (ii) for those assets in which the collateral is lower than the book value of the asset (“under-collateralization of assets”).

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) *Credit risk (continued)*

(ii) *Credit risk exposure (continued)*

The effect of the Group guarantee as at December 31, 2025 is the following:

<i>In RON thousand</i>	Group 2025							
	Exposures stage 1		Exposures stage 2		Exposures stage 3		POCI	
	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization
Corporate								
- Gross exposure	26,512,654	8,575,948	2,499,493	4,136,691	469,279	592,991	16,768	180,826
- Collateral	2,645,458	18,659,135	715,072	8,495,891	187,503	1,100,425	8,329	699,359
Small and medium enterprises								
- Gross exposure	6,758,019	4,076,061	1,490,466	780,957	670,292	179,184	14,522	51,506
- Collateral	1,374,490	8,423,058	440,998	1,959,852	178,680	523,519	7,317	216,479
Consumer loans and card loans granted to retail customers								
- Gross exposure	13,722,746	1,251,512	2,709,722	395,377	779,072	116,169	15,008	107,533
- Collateral	18,487	5,980,599	12,774	1,421,197	30,465	343,799	2,398	357,168
Mortgage loans								
- Gross exposure	476,193	22,290,299	48,688	2,559,780	19,926	176,577	4,104	109,933
- Collateral	370,390	48,959,948	33,067	5,495,031	10,631	394,100	3,372	299,347
Loans and finance lease receivables granted by non-banking financial institutions								
- Gross exposure	8,008,955	188,968	2,478,296	80,214	579,132	13,202	84,248	38,705
- Collateral	986,289	312,423	216,795	139,311	30,690	24,576	12,866	100,791
Other								
- Gross exposure	44	-	65,582	-	18,505	-	101	-
- Collateral	-	-	-	-	-	-	-	-

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) *Credit risk (continued)*

(ii) *Credit risk exposure (continued)*

The effect of the Group guarantee as at December 31, 2024 is the following:

<i>In RON thousand</i>	Group 2024								POCI	
	Exposures stage 1		Exposures stage 2		Exposures stage 3					
	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization
Corporate										
- Gross exposure	25,586,340	8,581,813	2,957,408	1,429,564	391,749	271,701			51,956	140,140
- Collateral	4,500,759	16,730,124	1,377,725	2,761,445	114,766	556,253			30,820	481,473
Small and medium enterprises										
- Gross exposure	7,080,394	3,143,039	1,778,470	597,626	583,997	128,968			46,154	42,333
- Collateral	2,676,405	6,302,322	783,093	1,521,941	166,406	330,465			21,824	110,105
Consumer loans and card loans granted to retail customers										
- Gross exposure	11,432,221	1,416,230	2,264,817	392,269	749,663	134,718			33,457	99,221
- Collateral	117,983	5,481,428	36,376	1,238,300	44,200	346,819			10,632	238,019
Mortgage loans										
- Gross exposure	3,381,107	17,672,467	108,649	2,610,152	40,688	149,060			39,986	80,928
- Collateral	2,317,787	35,663,663	78,824	5,278,635	24,546	300,164			30,869	136,381
Loans and finance lease receivables granted by non-banking financial institutions										
- Gross exposure	6,127,669	24,999	1,561,282	38,440	601,346	2,506			107,863	8,881
- Collateral	412,242	44,804	104,843	64,950	24,127	5,529			3,303	13,893
Other										
- Gross exposure	23	-	65,385	-	20,062	-			89	-
- Collateral	-	-	-	-	-	-			-	-

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The effect of the Bank guarantee as at December 31, 2025 is the following:

<i>In RON thousand</i>	Bank 2025							
	Exposures stage 1		Exposures stage 2		Exposures stage 3		POCI	
	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization
Corporate								
- Gross exposure	32,979,875	8,568,884	2,453,011	4,127,667	444,312	592,210	16,767	180,828
- Collateral	2,412,364	18,631,802	687,129	8,486,842	182,393	1,099,052	8,329	699,359
Small and medium enterprises								
- Gross exposure	6,217,231	3,990,896	1,451,903	766,140	653,227	178,229	14,522	51,506
- Collateral	1,242,091	8,246,630	434,009	1,931,957	172,030	519,959	7,317	216,479
Consumer loans and card loans granted to retail customers								
- Gross exposure	12,664,016	1,235,538	2,650,271	394,065	744,696	115,718	15,006	107,533
- Collateral	14,542	5,946,317	12,765	1,417,742	30,465	342,818	2,398	357,168
Mortgage loans								
- Gross exposure	153,408	21,906,055	39,464	2,537,404	18,646	172,190	4,104	109,933
- Collateral	106,305	48,320,713	25,034	5,456,375	9,569	386,683	3,372	299,347
Other								
- Gross exposure	42	-	57,534	-	18,446	-	102	-
- Collateral	-	-	-	-	-	-	-	-

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The effect of the Bank guarantee as at December 31, 2024 is the following:

<i>In RON thousand</i>	Bank 2024								POCI	
	Exposures stage 1		Exposures stage 2		Exposures stage 3					
	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization	Under-collateralization	Over-collateralization
Corporate										
- Gross exposure	28,459,446	7,445,177	2,674,544	1,378,935	307,087	255,496			2,147	61,215
- Collateral	3,071,492	14,434,122	1,260,775	2,696,173	97,952	533,389			85	320,521
Small and medium enterprises										
- Gross exposure	5,924,770	2,903,663	1,658,140	572,464	502,496	120,239			1,270	12,641
- Collateral	2,311,180	5,832,306	739,819	1,473,100	138,365	315,647			251	54,442
Consumer loans and card loans granted to retail customers										
- Gross exposure	9,878,391	1,160,264	2,212,406	370,244	701,445	132,116			9,323	56,119
- Collateral	27,133	4,885,948	28,771	1,191,204	42,133	340,174			4,614	162,363
Mortgage loans										
- Gross exposure	141,877	16,363,403	45,058	2,567,275	22,147	136,414			3,436	24,328
- Collateral	86,165	33,547,230	33,184	5,209,466	11,366	280,351			2,704	55,567
Other										
- Gross exposure	23	-	58,310	-	20,004	-			86	-
- Collateral	-	-	-	-	-	-			-	-

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The exposure representing credit risk refers to the following balance-sheet and off balance-sheet items:

- Cash with Central Banks and Deposits with banks and public institutions;
- Financial assets measured at amortized cost - loans and advances to customers;
- Financial assets measured at amortized cost - finance lease receivables;
- Financial assets measured at amortized cost- debt securities (see Note 24b);
- Contingent liabilities representing credit risk (irrevocable financial guarantees and undrawn irrevocable loan commitments).

The tables below show the reconciliation between the gross carrying amount and the net carrying amount of the individual components, of the risk exposure, consolidated as at December 31, 2025 and December 31, 2024:

<i>In RON thousand</i>		Group					
		2025			2024		
Assets	Notes	Gross carrying amount	Loss allowance (*)	Carrying amount (*)	Gross carrying amount	Loss allowance (*)	Carrying amount (*)
Cash and current accounts with Central Banks	19	19,637,424	3,486	19,633,938	16,505,715	4,360	16,501,355
Placements with banks and public institutions	20	16,559,364	7,070	16,552,294	13,719,257	4,387	13,714,870
Loans and advances to customers	22	106,853,054	6,407,047	100,446,007	96,115,263	5,335,637	90,779,626
Finance lease receivables	23	6,491,194	227,295	6,263,899	5,860,567	270,331	5,590,236
Financial assets measured at amortized cost - debt securities	24b	32,001,946	62,140	31,939,806	22,466,095	65,024	22,401,071
Total on-balance sheet		181,542,982	6,707,038	174,835,944	154,666,897	5,679,739	148,987,158
Irrevocable commitments given		2,336,237	56,331	2,279,906	2,645,350	67,363	2,577,987
Irrevocable financial guarantees given		9,002,620	147,421	8,855,199	7,912,979	160,599	7,752,380
Total off-balance sheet		11,338,857	203,752	11,135,105	10,558,329	227,962	10,330,367
Total on and off-balance sheet		192,881,839	6,910,790	185,971,049	165,225,226	5,907,701	159,317,525

(*) For off-balance sheet items the carrying amount represents the maximum exposure committed in case of default and for a loss allowance is the higher of unamortized balance and ECL

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

The tables below show the reconciliation between the Gross carrying amount and the net book value of the individual components, of the risk exposure, separate as at December 31, 2025 and December 31, 2024:

<i>In RON thousand</i>		Bank					
		Gross carrying amount	2025 Loss allowance (*)	Carrying amount (*)	Gross carrying amount	2024 Loss allowance (*)	Carrying amount (*)
Assets	Notes						
Cash and current accounts with Central Banks	19	17,674,016	1,655	17,672,361	12,195,679	2,670	12,193,009
Placements with banks and public institutions	20	14,478,752	2,471	14,476,281	13,616,760	4,703	13,612,057
Loans and advances to customers	22	105,631,379	5,940,298	99,691,081	86,182,399	4,792,410	81,389,989
Financial assets measured at amortized cost - debt securities	24b	29,907,633	36,319	29,871,314	19,423,179	46,416	19,376,763
Total on-balance sheet		167,691,780	5,980,743	161,711,037	131,418,017	4,846,199	126,571,818
Irrevocable commitments given		1,019,091	21,462	997,629	274,212	7,678	266,534
Financial and performance guarantees given		8,918,196	145,805	8,772,391	7,086,843	148,316	6,938,527
Total off-balance sheet		9,937,287	167,267	9,770,020	7,361,055	155,994	7,205,061
Total on and off-balance sheet		177,629,067	6,148,010	171,481,057	138,779,072	5,002,193	133,776,879

(*) For off-balance sheet items the carrying amount represents the maximum exposure committed in case of “default” and for a loss allowance is the higher of unamortized balance and ECL.

The Group and the Bank present the off balance sheet exposure for irrevocable facilities and the provisions related to the exposure of off-balance sheet risk as of December 31, 2025:

<i>In RON thousand</i>		Group				Bank			
		Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Irrevocable commitments given									
- Maximum exposure committed in case of “default”		2,008,378	309,645	18,214	2,336,237	997,817	5,280	15,994	1,019,091
- Loss allowance (*)		(27,596)	(11,315)	(17,420)	(56,331)	(5,464)	(6)	(15,992)	(21,462)
Financial and performance guarantees given									
- Maximum exposure committed in case of “default”		8,674,354	271,817	56,449	9,002,620	8,589,929	271,817	56,450	8,918,196
- Loss allowance (*)		(83,987)	(25,841)	(37,593)	(147,421)	(82,371)	(25,841)	(37,593)	(145,805)

(*) Higher of unamortized balance and ECL

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure (continued)

<i>Irrevocable commitments and financial and performance guarantees given - Stage 1</i> <i>In RON thousand</i>	Group					Bank				
	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2025	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2025
Corporate and public institutions	6,063,644	2,834,653	685,442	75,874	9,659,613	6,062,668	2,505,924	685,442	75,874	9,329,908
Small and medium enterprises	65,783	258,851	29,620	-	354,254	65,738	162,422	29,620	-	257,780
Retail	-	89,967	-	-	89,967	-	-	-	-	-
Mortgage loans	-	3,273	-	-	3,273	-	-	-	-	-
Non-banking financial institutions	60,001	515,565	-	-	575,566	-	-	-	-	-
Others	59	-	-	-	59	58	-	-	-	58
Total irrevocable commitments and financial and performance guarantees given before impairment provision	6,189,487	3,702,309	715,062	75,874	10,682,732	6,128,464	2,668,346	715,062	75,874	9,587,746
Provisions for impairment losses on irrevocable commitments and financial and performance guarantees given	(15,968)	(70,368)	(21,656)	(3,591)	(111,583)	(14,549)	(48,039)	(21,656)	(3,591)	(87,835)
Total irrevocable commitments and financial and performance guarantees given net of impairment provision	6,173,519	3,631,941	693,406	72,283	10,571,149	6,113,915	2,620,307	693,406	72,283	9,499,911

<i>Irrevocable commitments and financial and performance guarantees given Stage 2</i> <i>In RON thousand</i>	Group				Bank			
	Low - moderate risk	Sensitive risk	High risk	Total 2025	Low - moderate risk	Sensitive risk	High risk	Total 2025
Corporate and public institutions	142,989	104,182	17,416	264,587	132,577	104,182	17,415	254,174
Small and medium enterprises	12,346	5,780	6,544	24,670	10,599	5,780	6,544	22,923
Retail	3,687	511	-	4,198	-	-	-	-
Non-banking financial institutions	280,362	5,777	-	286,139	-	-	-	-
Others	1,868	-	-	1,868	-	-	-	-
Total irrevocable commitments and financial and performance guarantees given before impairment Provision	441,252	116,250	23,960	581,462	143,176	109,962	23,959	277,097
Provisions for impairment losses on irrevocable commitments and financial and performance guarantees given	(16,573)	(17,113)	(3,470)	(37,156)	(5,751)	(16,626)	(3,470)	(25,847)
Total irrevocable commitments and financial and performance guarantees given net of impairment provision	424,679	99,137	20,490	544,306	137,425	93,336	20,489	251,250

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

<i>Irrevocable commitments and financial and performance guarantees given - Stage 3</i> <i>In RON thousand</i>	Group					Total 2025	Bank					Total 2025
	3 months	3-6 months	6f months	9-12 months	>1 year		3 months	3-6 months	6-9 months	9-12 months	>1 year	
Corporate and public institutions	21,234	6,908	4,088	3,190	31,539	66,959	21,234	6,908	4,088	3,190	31,539	66,959
Small and medium enterprises	3,413	634	-	618	819	5,484	3,413	634	-	618	820	5,485
Retail	8	36	5	8	93	150	-	-	-	-	-	-
Non-banking financial institutions	231	68	48	63	1,660	2,070	-	-	-	-	-	-
Total irrevocable commitments and financial and performance guarantees given before impairment provision	24,886	7,646	4,141	3,879	34,111	74,663	24,647	7,542	4,088	3,808	32,359	72,444
Provisions for impairment losses on irrevocable commitments and financial and performance guarantees given	(22,450)	(5,507)	(3,415)	(3,214)	(20,427)	(55,013)	(22,297)	(5,439)	(3,381)	(3,170)	(19,298)	(53,585)
Total irrevocable commitments and financial and performance guarantees given net of impairment provision	2,436	2,139	726	665	13,684	19,650	2,350	2,103	707	638	13,061	18,859

The Group and the Bank present the off balance sheet exposure for irrevocable facilities and the provisions related to the exposure of off-balance sheet as of December 31, 2024:

<i>In RON thousand</i>	Group				Bank			
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Stage 2	Stage 3	Total
Irrevocable commitments given								
- Maximum exposure committed in case of "default"	2,366,791	211,768	66,791	2,645,350	265,281	1,669	7,262	274,212
- Loss allowance (*)	(43,802)	(12,960)	(10,601)	(67,363)	(1,771)	-	(5,907)	(7,678)
Financial and performance guarantees given								
- Maximum exposure committed in case of "default"	7,537,441	222,754	152,784	7,912,979	6,734,884	216,264	135,695	7,086,843
- Loss allowance (*)	(63,914)	(28,653)	(68,032)	(160,599)	(54,458)	(28,198)	(65,660)	(148,316)

(*) Higher of unamortized balance and ECL

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

(ii) Credit risk exposure (continued)

	Group					Bank				
<i>Irrevocable commitments and financial and performance guarantees given - Stage 1</i>	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2024	Very low risk	Low risk	Moderate risk	Sensitive risk	Total 2024
<i>In RON thousand</i>										
Corporate and public institutions	5,459,605	1,703,282	1,227,905	82,421	8,473,213	4,909,806	1,091,147	781,408	10,524	6,792,885
Small and medium enterprises	114,456	346,725	111,525	6,038	578,744	53,204	127,993	25,152	-	206,349
Retail	18,706	110,540	1,574	776	131,596	900	-	31	-	931
Mortgage loans	-	3,360	-	-	3,360	-	-	-	-	-
Non-banking financial institutions	61,211	655,178	-	-	716,389	-	-	-	-	-
Others	900	-	30	-	930	-	-	-	-	-
Total irrevocable commitments and financial and performance guarantees given before impairment provision	5,654,878	2,819,085	1,341,034	89,235	9,904,232	4,963,910	1,219,140	806,591	10,524	7,000,165
Provisions for impairment losses on irrevocable commitments and financial and performance guarantees given	(14,850)	(49,949)	(36,601)	(6,316)	(107,716)	(11,375)	(22,659)	(21,577)	(618)	(56,229)
Total irrevocable commitments and financial and performance guarantees given net of impairment provision	5,640,028	2,769,136	1,304,433	82,919	9,796,516	4,952,535	1,196,481	785,014	9,906	6,943,936
	Group					Bank				
<i>Irrevocable commitments and financial and performance guarantees given - Stage 2</i>	Low - moderate risk	Sensitive risk	High risk	Total 2024		Low - moderate risk	Sensitive risk	High risk	Total 2024	
<i>In RON thousand</i>										
Corporate and public institutions	129,602	92,745	30,994	253,341		113,573	71,240	10,517	195,330	
Small and medium enterprises	19,702	10,059	11,095	40,856		11,074	9,353	2,176	22,603	
Retail	6,733	1,055	189	7,977		-	-	-	-	
Non-banking financial institutions	124,111	3,845	-	127,956		-	-	-	-	
Others	4,392	-	-	4,392		-	-	-	-	
Total irrevocable commitments and financial and performance guarantees given before impairment Provision	284,540	107,704	42,278	434,522		124,647	80,593	12,693	217,933	
Provisions for impairment losses on irrevocable commitments and financial and performance guarantees given	(13,243)	(22,397)	(5,973)	(41,613)		(5,779)	(20,244)	(2,175)	(28,198)	
Total irrevocable commitments and financial and performance guarantees given net of impairment provision	271,297	85,307	36,305	392,909		118,868	60,349	10,518	189,735	

The explanatory notes to the financial statements from page 11 to page 184 are an integral part of these financial statements.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

b) Credit risk (*continued*)

(ii) Credit risk exposure (*continued*)

<i>Irrevocable commitments and financial and performance guarantees given - Stage 3</i> <i>In RON thousand</i>	Group						Bank					
	3 months	3-6 months	6-9 months	9-12 months	>1 year	Total 2024	3 months	3-6 months	6-9 months	9-12 months	>1 year	Total 2024
Corporate and public institutions	14,273	44,639	11,583	25,261	116,875	212,631	7,374	42,410	10,647	25,223	56,028	141,682
Small and medium enterprises	1,198	2,095	96	513	479	4,381	571	48	-	325	331	1,275
Retail	449	85	121	46	576	1,277	-	-	-	-	-	-
Non-banking financial institutions	550	56	42	54	584	1,286	-	-	-	-	-	-
Total irrevocable commitments and financial and performance guarantees given before impairment provision	16,470	46,875	11,842	25,874	118,514	219,575	7,945	42,458	10,647	25,548	56,359	142,957
Provisions for impairment losses on irrevocable commitments and financial and performance guarantees given	(9,092)	(11,894)	(8,309)	(13,241)	(36,097)	(78,633)	(5,358)	(11,310)	(7,467)	(13,013)	(34,419)	(71,567)
Total irrevocable commitments and financial and performance guarantees given net of impairment provision	7,378	34,981	3,533	12,633	82,417	140,942	2,587	31,148	3,180	12,535	21,940	71,390

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss allowance

The measurement of the expected credit loss allowance for financial assets is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behavior (e.g. the likelihood of customers defaulting and the resulting losses).

The financial assets that are the subject of this chapter are:

- Loans and advances to customers at amortized cost;
- Finance lease receivables;
- Lending commitments and financial guarantees offered by the Group and the Bank (e.g. letter of credit, letter of guarantees);
- Placements made in other banks, including mandatory minimum reserves (RMO) and loans to other bank institutions;
- Portfolio of financial instruments measured at FVOCI (e.g. government bonds, corporate or municipal bonds, etc.);
- Financial instruments portfolio measured at amortized cost (e.g. government bonds, corporate or municipal bonds, etc.).

A number of significant judgements are also required in applying the accounting requirements for measuring ECL, such as:

- Establishing groups of similar financial assets for the purposes of measuring ECL;
- Determining criteria for significant increase in credit risk;
- Choosing appropriate models and assumptions for the measurement of ECL;
- Establishing the number and relative weightings of forward-looking scenarios for ECL.

IFRS 9 outlines a 'three-stage' model for impairment based on changes in credit quality since initial recognition as summarized below:

- A financial instrument that is not credit-impaired on initial recognition or, the assets there are no indicators fulfilled to presume that has been an increase in credit risk is classified in 'Stage 1';
- If a significant increase in credit risk ('SICR') since initial recognition is identified, the financial instrument is moved to 'Stage 2' but is not yet deemed to be credit-impaired;
- If the financial instrument is credit-impaired, the financial instrument is then moved to 'Stage 3'.

For financial assets classified in "Stage 1", the amount of loss allowance is determined on the basis of the expected loss in the next 12 months (12M-ECL), which represents the credit losses in the event of default within a period of 12 months from the reporting date. For financial assets classified in "Stage 2" or "Stage 3", the amount of loss allowance is measured based on the expected credit losses over the entire lifetime (LT-ECL).

A general approach in measuring ECL in accordance with IFRS 9 is that it should consider forward-looking information.

Purchased or originated credit-impaired financial assets are those financial assets that are credit-impaired on initial recognition. Their ECL is always measured on a lifetime basis.

Notes to the consolidated and separate financial

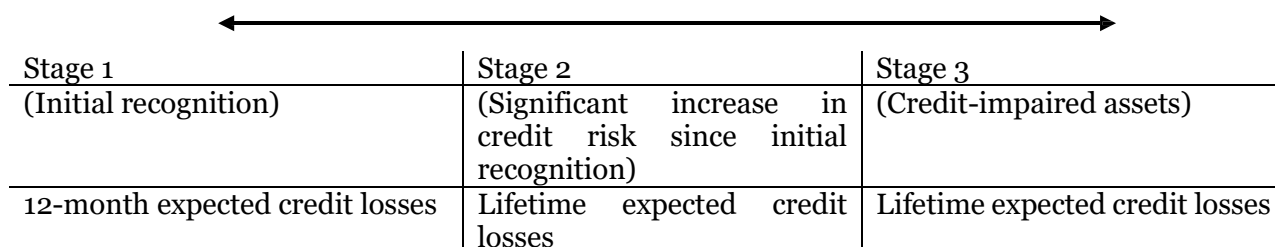
4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss allowance (continued)

The following diagram summarizes the impairment requirements under IFRS 9 (other than purchased or originated credit-impaired financial assets):

Change in credit quality since initial recognition



Expected credit losses are the discounted product of the Probability of Default (PD), Exposure at Default (EAD), and Loss Given Default (LGD), defined as follows:

- The PD represents the likelihood of a borrower defaulting on its financial obligation (as per “Definition of default and credit-impaired” above), either over the next 12 months (12M PD), or over the remaining lifetime (Lifetime PD) of the asset.
- EAD is based on the amounts the Group and the Bank expects to be owed at the time of default, over the next 12 months (12M EAD) or over the remaining lifetime (Lifetime EAD).
- Loss Given Default (LGD) represents a Group’s and the Bank’s expectation of the extent of loss on a defaulted exposure. LGD varies by type of counterparty and availability of collateral or other credit support.

The ECL is determined by projecting the PD, LGD and EAD for each future month and for each individual exposure. The expected credit losses for each future month are subsequently discounted to the reporting date and the total ECL is determined by aggregating the discounted expected credit losses.

The measurement of expected credit losses considers:

- An unbiased amount: Determined as a probability-weighted average of a range of possible outcomes.
- Time value of money: Expected credit losses are discounted using the effective interest rate.
- Forward-looking information: The measurement incorporates information about past events, current conditions, and reasonable and supportable forecasts of future economic conditions that are available without undue cost or effort at the reporting date.

Parameters used in the calculation of ECL are determined by considering the grouping of financial asset portfolios according to similar characteristics considered decisive in originating and monitoring credit risk, respectively the type of counterparty (debtor), products and currencies. In the case of Legal entities, in addition to the above characteristics, when grouping into a certain portfolio, the following characteristics are also considered: the primary industry in which the clients operate, established during the exposure approval stage, and the level of sensitivity to the identified risks.

The discount rate used in the ECL calculation is the original effective interest rate or an approximation thereof.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss allowance (continued)

The determination of expected losses at the reporting date relies on the effective interest rate established upon the initial recognition, except financial assets with variable interest rate, for which the expected credit losses must be determined based on the current effective interest rate. As concerns the purchased or originated financial assets that are credit-impaired, the expected credit losses must be determined based on the credit-adjusted effective interest rate established upon the initial recognition.

The 12-month and lifetime EADs are determined based on the expected payment profile, which varies by product type.

- For amortizing products and bullet repayment loans, this is based on the contractual repayments owed by the borrower over a 12 months or lifetime basis.
- For revolving products and other commitments, for determining the exposure in default, the current used balance part is taken into account, being applied a credit conversion factor, estimated by the Bank, based on its own historical analysis.

Significant increase in Credit Risk

In determining whether a significant increase in credit risk occurred since initial recognition the Group and the Bank consider reasonable and supportable information that is relevant and can be obtained without undue cost and effort. The assessment of the significant increase of the risk is made at individual level, analyzing the criteria of each asset. The Group and the Bank consider a financial instrument to have registered a significant increase in credit risk when one or more of the following quantitative, qualitative or backstop criteria have been met:

Quantitative criteria:

The Bank uses quantitative criteria as the primary indicator of significant increase in credit risk for all material portfolios. Quantitative SICR indicators include a comparison of the remaining lifetime PD at reporting date with the residual lifetime PD at the date of initial recognition. The Bank established thresholds for significant increases in credit risk based on both a percentage (relative) and absolute change in PD compared to initial recognition.

In general, a significant increase in credit risk is considered to have occurred with a relative increase of more than 150% compared to the initial PD for companies and more than 100% for individuals (except for Overdraft and First House loans for which the relative threshold is 200%). Regarding absolute threshold, this is set to more than 100bp for individuals (except for Overdraft and First House loans for which the absolute threshold is 200bp) and more than 200bp for companies.

Qualitative criteria for retail portfolios (individuals):

- Significant increase in credit risk perceived by the risk analysis team for individually assessed exposures;
- It is classified as performing restructured;
- Analysis of the LTV (loan to value) indicator for mortgages and consumer loans secured by mortgages (corroborated with the history of non-payments, if any);
- Denominated in high-risk currency category;
- Loan products with higher associated risk;
- Facilities owned by customers with sensitive ratings;
- Change in rating grade;
- The number of days past due recorded by the debtor.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss allowance (continued)

Qualitative criteria for corporate and public institutions portfolios:

- Significant increase in credit risk perceived by the risk analysis team for individually assessed exposures (debtor level), concluded through including these in the Bank's Watch List;
- Significant adverse changes in business, financial and/or economic conditions in which the borrower operates (rating deterioration);
- Actual or expected forbearance operation;
- Early signs of cash flow/liquidity problems such as delay in servicing of trade creditors/loans;
- The borrower is assigned to Remediation department;
- Facilities owned by customers with sensitive ratings;
- Change in rating grade;
- The number of days past due recorded by the debtor.

The assessment of SICR incorporates forward-looking information.

If there is evidence that the SICR criteria are no longer met, the instrument is transferred back to Stage 1 (this is not applied to forbearance criteria - see below). If an exposure has been transferred to Stage 2 based on a mentioned quantitative/qualitative indicator, the Group and the Bank monitors whether that indicator continues to exist or has changed.

In relation to Treasury financial instruments, where a Watchlist is used to monitor credit risk, this assessment is performed at the counterparty level and on a periodic basis. The criteria used to identify SICR are monitored and reviewed periodically for appropriateness by the independent Credit Risk team.

If the contractual cash flows on a financial asset have been renegotiated or modified and the financial asset was not derecognized, the Bank assesses whether there has been a significant increase in the credit risk of the financial instrument, compared to:

- the risk of a default occurring at the reporting date (based on the modified contractual terms); and
- the risk of a default occurring at initial recognition (based on the original, unmodified contractual terms).

Especially for forbore loans (restructured operation made for debtors that are facing financial difficulties), the Bank considers them to have significant increase in credit risk implied. Such operations result in the assets being classified as Stage 2 or Stage 3, with expected credit losses calculated on a lifetime basis. The classification in Stage 3 is made according to the type and nature of the restructuring, considering in this sense the provisions of the prudential regulations (EBA Guideline 2016-07 on the definition of default establishes when a restructuring is in a state of default). At the same time, when a new restructuring is applied to the exposure during the probation period or the debt service exceeds 30 days, that exposure will be reclassified in Stage 3.

For performing forbore financial assets, the Bank establishes a probation period (at least 2 years after the concluding event), for which expected credit losses are computed on a lifetime basis.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss (continued)

The performing forbearance classification can be discontinued, and the account can become a non-forborne account when a minimum of two years has passed from the date of classifying the exposure as performing forbearance (probation period) and the criteria assessed by the Bank are met, related to client financial status and payments that have been made after the event (frequency and volume).

Backstops

A backstop is applied and the financial instrument considered to have registered a significant increase in credit risk if the borrower is more than 30 days past due on its contractual payments.

Also, when the whole outstanding amount of the loan becomes overdue (its final maturity date is passed), then it will be classified in stage 2.

Low credit risk exemption

The Group and the Bank is using the low credit risk exemption only for debt financial instruments (e.g. sovereign bonds, municipal bonds, corporate bond and bonds issued by financial institutions). All financial assets with an assigned rating (at the reporting date) of an investment grade nature are classified as Stage 1.

Definition of default and credit-impaired assets

The Group and the Bank define a financial instrument as in default, which is fully aligned with the definition of credit impaired, when it meets one or more of the following criteria:

- The exposure is more than 90 days past due on its contractual payments (also including the new default definition which is referring to significant overdue amount*);
- Exposures for which it is unlikely that the debtor will fully fulfill his payment obligations without the execution of guarantees, regardless of the existence of outstanding amounts or the number of days of delay in payment, respectively;
- An active market for that financial asset has disappeared because of financial difficulties;
- Financial assets are purchased or originated at a deep discount that reflects the incurred credit losses.

The default definition implemented in the Group has been developed in accordance with EBA/GL/2016/07 Guidelines on the application of the definition of default under Article 178 of Regulation (EU) No 575/2013. The Group generally follows a customer view in applying the default definition, which leads to an impairment of all claims even if the customer defaults only on one of several transactions.

* Threshold for assessing the material significance of a credit obligation, as provided for in Article 178 (1) (b) of Regulation (EU) No 575/2013, consists of an absolute component and a relative component. The absolute component is expressed as the maximum value of the sum of all the overdue amounts that a debtor owes to the creditor. The relative component is expressed as a percentage that reflects the ratio between the value of the overdue loan obligations and the total exposures to that debtor.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss (continued)

For this indicator, it is considered that the debtor is in default when both the limit expressed as the absolute component of the significance threshold and the limit expressed as the relative component of the significance threshold are exceeded for 90 consecutive days. According to NBR Regulation 5/2018, the level of the relative component and the level of the absolute component of the significance threshold is as follows:

- For retail exposures:
 - The level of the relative component of the significance threshold is 1%;
 - The level of the absolute component of the significance threshold is RON 150.
- For other types of exposures than retail exposures:
 - The level of the relative component of the significance threshold is 1%;
 - The level of the absolute component of the significance threshold is RON 1,000.

The above criteria have been applied to all financial instruments held by the Group and are consistent with the definition of the default used for internal credit risk management purposes. An upgrade to a non-defaulted rating is possible when it no longer meets any of the default criteria for a consistent period of time, depending on the main trigger for the default classification. This period has been determined applying the requirements stipulated by the EBA Guideline 2016-07 on the definition of default, considering also the expert's opinion. For example, the healing period for the loans in default status based on the days past due criteria is of minimum 3 months while the healing period for nonperforming forborne asset starts at one year.

Incorporation of Forward-Looking Information (FLI)

The assessment of SICR and estimation of expected credit losses involves forecasting future economic conditions. The Group and the Bank have performed historical analysis and identified the key economic variables impacting credit risk and expected credit losses for each portfolio. Forecasts of these economic variables are provided by the Bank's macroeconomic research department and provide the best estimate view of the economy over the next three years.

The economic forecasts are reflected within a baseline scenario and several alternative scenarios reflecting the expected developments for the macroeconomic variables selected as relevant. The alternative scenarios are derived, together with their probabilities of occurrence, as a deviation from baseline forecasts. The purpose of using multiple scenarios is to model the non-linear impact of assumptions based on macroeconomic factors on the expected credit losses.

Usually, the Bank uses three scenarios: base scenario (which is the most probable scenario of the economic environment), optimistic and adverse scenario (which is not necessarily a crisis scenario). The scenario weightings are determined by a combination of statistical analysis and expert credit judgement, taking into account the range of possible representative outcomes for each chosen scenario.

The European macroeconomic environment has seen improvements in some indicators, but it still faces geopolitical tensions that may affect economic stability and growth. These tensions mainly result from ongoing conflicts, economic policies and international relations. These geopolitical tensions contribute to a complex economic landscape. They increase uncertainty, which can discourage investment and slow economic growth. Volatility in energy prices, driven by conflicts in key regions, has led to higher inflation, affecting both consumers and firms.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss (continued)

In addition, disruptions in global trade due to protectionist policies and conflicts can have a negative impact on exports and the supply chain. Energy and utility cost developments remain subject to uncertainties stemming from market factors and regulatory changes. In Romania, the removal of the electricity price cap (starting 1 July 2025) and the temporary maintenance of the natural gas price cap may lead to fluctuations in household and corporate utility expenses. In addition, fiscal consolidation measures announced or implemented by the authorities (including VAT restructuring, excise duty increases and the rise in dividend taxation starting 2026) may influence costs and overall market conditions.

Scenarios weights, for the Bank:

	Optimist	Base case	Pessimist
Y2025	10%	50%	40%
Y2024	10%	50%	40%

In the base case macroeconomic scenario, the Group and the Bank anticipate a slightly positive economic growth with a downward trend for the key elements that previously disrupted the economic environment (inflation and interest rates). The relaxation of inflationary pressures to a moderate level and the continuation of the economic recovery process will lead the central bank to recalibrate the monetary policy by reducing the reference interest rate - imperatively necessary for the growth of lending and the stimulation of the economy.

The adverse scenario sets levels for key economic and financial variables in a hypothetical adverse situation triggered by the materialization of risks to which the economy is exposed - in a negative scenario, Romania faces external and internal difficulties, aggravated by inadequate management of reforms and geopolitical instability. Also, other factors considered are: failure to implement structural reforms and poor absorption of EU funds; the persistence of fiscal imbalances (high budget deficit, growing debt) increase financing pressures; adverse external conditions (global recession, geopolitical tensions) affect exports and capital flows; high inflation due to external shocks on energy and food prices - all this could materialize in an increase in the number of insolvencies/defaults.

In the optimistic macroeconomic scenario, we expect the Romanian economy to benefit from favorable economic and geopolitical conditions, along with the effective implementation of structural reforms and the optimal absorption of EU funds, with favorable consequences for the labor market and private consumption. The inflation rate is under control and falls above the expectations, while economic growth surprises on the upside. Negative factors that could affect the growth of the economy are being kept under control, and supply chain issues are easing.

For the Bank and its subsidiaries from Romania, the most important macro-economic indicators regarding the future considered in ECL modeling are as follows:

- GDP
- Unemployment rate
- Inflation rate
- Interest rate evolution (EURIBOR/ ROBOR)
- FX evolution
- Private consumption
- House price index

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

b) Credit risk (continued)

Determining adjustments of the expected credit loss (continued)

Optimist scenario - Macro indicators	2026	2027	2028
Real GDP (% , YoY)	2.63	3.45	3.86
Unemployment rate (%)	5.42	4.76	4.63
Inflation (HICP) (% , year to year)	5.35	2.64	2.22
Key interest rate ROBOR 3M (%)	5.31	4.07	3.03
Key interest rate EURIBOR 3M (%)	1.78	1.64	1.43
House prices (% , year on year)	6.45	7.59	8.25
Base/central scenario - Macro indicators	2026	2027	2028
Real GDP (% , YoY)	1.49	2.38	2.73
Unemployment rate (%)	6.22	6.17	6.02
Inflation (HICP) (% , year to year)	6.74	4.00	3.28
Key interest rate ROBOR 3M (%)	6.02	5.02	4.18
Key interest rate EURIBOR 3M (%)	1.97	1.92	1.79
House prices (% , year on year)	4.24	4.74	5.32
Pessimist scenario - Macro indicators	2026	2027	2028
Real GDP (% , YoY)	0.60	0.84	1.12
Unemployment rate (%)	6.84	7.19	7.28
Inflation (HICP) (% , year to year)	9.04	7.08	4.86
Key interest rate ROBOR 3M (%)	7.30	6.46	5.55
Key interest rate EURIBOR 3M (%)	2.25	2.36	2.44
House prices (% , year on year)	2.69	1.85	1.27

The table below illustrates the impact of setting maximum weights for each scenario, at Bank level:

Changes in weights	100% pessimist	100% baseline	100% optimistic
ECL movement	+114 mn RON	-45 mn RON	-242 mn RON

Considering that the applied scenarios differ from the scenarios used at December 31, 2024, the changes in sensitivities from end of 2025 to end of 2024 are therefore not directly comparable.

As with any economic forecasts, the projections and likelihoods of occurrence are subject to a high degree of inherent uncertainty and therefore the actual outcomes may be significantly different to those projected. The Group and the Bank consider these forecasts to represent its best estimate of the possible outcomes and have analyzed the non-linearities and asymmetries within the Group's and the Bank's different portfolios to establish that the chosen scenarios are appropriately representative of the range of possible scenarios.

c) Liquidity risk and funding risk

Liquidity and funding risk represents the risk that the bank will be unable to meet its payment obligations when they fall due, without incurring excessive costs or relevant losses, due to its limited capacity to generate liquidity or access stable sources of funding.

Liquidity and funding risk has 2 components: the difficulty in procuring funds at maturity in order to refinance current assets or the inability to convert an asset into cash at a value near its fair value in a reasonable period of time.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

c) Liquidity risk and funding risk (continued)

Liquidity and funding risk management is a strategic objective of Banca Transilvania, aimed at maximizing asset returns through efficient and adapted liquidity control, in line with market developments and regulatory requirements.

The management framework is based on solid principles: integrating liquidity management into the development strategy, complying with applicable regulations, balancing prudential requirements with those of stability and profitability, maintaining a healthy liquidity profile under all conditions, as well as identifying and assessing significant risks — including intraday risk, liquidity risk and funding risk.

The Group and the Bank have access to a diverse funding base. Funds are raised by using a broad range of instruments, including deposits from customers or from banks, loans from development institutions and financial institutions and share capital. Access to diverse funding sources improves the flexibility to attract funds, limiting the dependence on one type of financing and on one type of partner and leading to an overall decrease of financing costs.

The Group and the Bank try to maintain a balance between continuity and flexibility in attracting funds, by signing financing contracts with different maturities and in different currencies. The Group and the Bank continually assess liquidity risk by identifying and monitoring changes in the financing contracts, and by diversifying the funding sources. The operational liquidity management is also performed intraday, so as to ensure all the settlements/payments assumed by the Group and the Bank, on their own behalf or on behalf of their clients, in RON or FCY, on account or in cash, within the internal, legal and mandatory limits.

Defining elements of daily/intraday liquidity management are:

- Minimum Required Reserve;
- Securities and bonds portfolio;
- Raised/placed deposits on the interbank market;
- Cash in cashiers and ATMs;
- Available in correspondent accounts

In addition, liquidity gaps (which describe maturity mismatches) are reported and monitored regularly. The risk of funding concentration (at the level of groups of depositors) is monitored and analyzed daily. The Assets and Liabilities Management Committee of the Bank is responsible with the periodic review of liquidity indicators and with the establishment of corrective measures regarding balance sheet figures, so as to eliminate unacceptable deviations in terms of liquidity risk. The Bank has defined a structured framework of limits for liquidity and funding risk, which includes strategic limits, supporting risk indicators and operational limits. These are monitored periodically (daily, weekly, monthly and quarterly) and reported to the bank's management structures. The main indicators monitored are LCR (Liquidity Coverage Ratio) and NSFR (Net Stable Funding Ratio)

The contingency plan aims to provide the methodology for rapid detection of liquidity problems as well as appropriate and timely solutions.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

c) Liquidity risk and funding risk (continued)

The objectives of the plan include:

- Defining the measure levels associated with potential crisis conditions;
- Definition of informative reports on liquidity, including but not limited to the reporting of warning indicators that will be monitored in order to detect problems in time and provide quick answers;
- Carrying out preliminary preparations to ensure prompt solutions to financing problems. These preparations refer to the identification of responsible parties, general and specific solutions, the development of information that facilitates liquidity management, liquidity reporting, planning requirements, training and testing.
- Ensuring managerial flexibility in relation to the unique circumstances and characteristics of any financing crisis that may arise.

Crisis simulation scenarios are elaborated by considering various severity levels, various probabilities and different periods of occurrence. Their purpose is to identify/assess potential losses and the potential impact of events or the factors that may generate a liquidity crisis. Additionally, they offer information regarding the impact of liquidity risk determinants on the Group's and Bank's capacity to provide liquidity to its customers and to maintain adequate liquidity levels.

The liquidity reserve is calibrated according to 3 factors:

- a) severity and characteristics of crisis scenarios;
- b) the time horizon established as a maintenance period;
- c) the characteristics of the assets included in the reserve.

The Bank manages the stock of liquid assets in order to ensure, to the greatest extent possible, that it will be available in periods of stress. High concentrations in certain assets are avoided and possible legal, regulatory or operational impediments to the use of these assets are analyzed.

Also, the Bank has defined mechanisms and measures to guarantee its access to adequate sources of financing in case of emergency (e.g. BNR, ECB facilities, attracting funds from other financial institutions, etc.).

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

c) Liquidity risk (continued)

The assets and liabilities of the Group as at December 31, 2025, analyzed as per the period remaining until the contractual maturity, on models based on the contractual maturity related to the liquidity band, are the following:

Group - In RON thousand	Carrying amount	Gross value (inflow /outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
Financial liabilities									
Deposits from banks	301,847	(301,847)	(253,641)	-	-	(48,206)	-	-	-
Deposits from customers	175,249,810	(176,269,982)	(98,471,261)	(15,913,097)	(16,591,963)	(39,281,013)	(5,155,021)	(857,627)	-
Loans from banks and other financial institutions	17,122,801	(20,299,296)	(889,082)	(621,120)	(959,320)	(10,483,079)	(5,565,661)	(1,781,034)	-
Subordinated liabilities and issued bonds	2,643,277	(3,683,501)	-	(98,541)	(99,083)	(1,804,635)	(221,964)	(1,459,278)	-
Financial liabilities held-for-trading	261,867	(261,867)	(7,828)	(10,319)	(13,166)	(68,687)	(131,966)	(29,901)	-
Lease liabilities	624,366	(677,374)	(42,275)	(40,352)	(82,869)	(274,212)	(175,441)	(62,225)	-
Other financial liabilities	3,446,704	(3,446,704)	(3,415,791)	(1,186)	(11,436)	(11,824)	(6,097)	(370)	-
Total financial liabilities	199,650,672	(204,940,571)	(103,079,878)	(16,684,615)	(17,757,837)	(51,971,656)	(11,256,150)	(4,190,435)	-
Financial assets									
Cash and current accounts with Central Banks	25,499,275	25,506,275	25,506,275	-	-	-	-	-	-
Placements with banks and public institutions	16,552,294	16,627,923	16,007,927	32,048	131,072	407,522	40,996	8,358	-
Financial assets held for trading and measured at fair value through profit or loss	591,855	592,323	321,598	35	73	903	-	-	269,714
Derivatives	145,824	145,824	15,694	5,517	5,789	62,745	40,778	15,301	-
Loans and advances to customers	100,446,007	146,264,086	11,525,889	8,066,168	21,899,382	37,926,948	19,727,718	47,117,981	-
Finance lease receivables	6,263,899	7,199,918	818,515	602,313	1,202,292	3,325,851	1,220,837	30,110	-
Financial assets measured at fair value through other items of comprehensive income	34,625,744	38,946,526	29,557,278	535,424	884,542	3,485,391	1,721,782	2,498,604	263,505
Financial assets which are required to be measured at fair value through profit or loss	1,904,620	2,150,251	1,114,166	4,671	9,342	186,396	25,692	204,349	605,635
Financial assets at amortized cost - debt instruments	31,939,806	38,697,501	5,595,209	5,747,250	6,525,906	8,640,377	8,042,512	4,146,247	-
Other financial assets	2,019,812	2,151,794	1,827,496	304,575	19,723	-	-	-	-
Total financial assets	219,989,136	278,282,421	92,290,047	15,298,001	30,678,121	54,036,133	30,820,315	54,020,950	1,138,854
Net balance sheet position		73,341,850	(10,789,831)	(1,386,614)	12,920,284	2,064,477	19,564,165	49,830,515	1,138,854

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

c) *Liquidity risk (continued)*

Group - In RON thousand	Carrying amount	Gross value (inflow / outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
December 31, 2025									
Off-balance sheet									
Irrevocable commitments given	2,279,906	2,336,237	62,816	43,669	220,454	1,409,660	495,035	104,603	-
Financial and performance guarantees given	8,855,199	9,002,620	890,570	1,035,346	2,673,683	3,017,801	512,643	872,577	-
Notional amount of swap and forward contracts	-	-	-	-	-	-	-	-	-
- Deliverable amounts	(5,189,683)	(5,189,683)	(2,744,885)	(412,512)	(103,741)	(1,132,225)	(796,320)	-	-
- Receivable amounts	13,295,732	13,295,732	2,918,660	543,762	925,641	3,484,857	4,210,414	1,212,398	-
Net position of derivatives	8,106,049	8,106,049	173,775	131,250	821,900	2,352,632	3,414,094	1,212,398	-
Total off-balance sheet	19,241,154	19,444,906	1,127,161	1,210,265	3,716,037	6,780,093	4,421,772	2,189,578	-
Total net on- and off-balance sheet position		53,896,944	(11,916,992)	(2,596,879)	9,204,247	(4,715,616)	15,142,393	47,640,937	1,138,854

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

c) *Liquidity risk (continued)*

The assets and liabilities of the Group as at December 31, 2024, analyzed as per the period remaining until the contractual maturity, on models based on the contractual maturity related to the liquidity band, are the following:

Group - In RON thousand	Carrying amount	Gross value (inflow /outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
Financial liabilities									
Deposits from banks	951,155	(951,431)	(830,896)	-	(24,871)	(95,664)	-	-	-
Deposits from customers	167,869,266	(168,943,487)	(91,790,831)	(15,078,535)	(16,920,439)	(40,013,367)	(4,421,920)	(718,395)	-
Loans from banks and other financial institutions	12,237,716	(14,955,273)	(305,151)	(516,011)	(734,565)	(5,945,538)	(3,801,930)	(3,652,078)	-
Subordinated liabilities and issued bonds	2,530,535	(3,715,697)	-	(97,495)	(98,107)	(391,488)	(1,669,542)	(1,459,065)	-
Financial liabilities held-for-trading	235,322	(235,322)	(15,420)	(1,013)	(10,948)	(66,818)	(110,055)	(31,068)	-
Lease liabilities	617,498	(681,689)	(55,965)	(38,199)	(77,243)	(254,518)	(168,398)	(87,366)	-
Other financial liabilities	3,767,710	(3,767,710)	(3,761,889)	(1,677)	(4,114)	(30)	-	-	-
Total financial liabilities	188,209,202	(193,250,609)	(96,760,152)	(15,732,930)	(17,870,287)	(46,767,423)	(10,171,845)	(5,947,972)	-
Financial assets									
Cash and current accounts with Central Banks	21,950,170	21,955,081	21,955,081	-	-	-	-	-	-
Placements with banks and public institutions	13,714,870	13,898,443	13,268,376	936	284,558	-	-	344,573	-
Financial assets held for trading and measured at fair value through profit or loss	389,817	389,817	208,978	-	-	-	-	-	180,839
Derivatives	173,030	173,030	36,334	3,065	3,124	51,690	61,572	17,245	-
Loans and advances to customers	90,779,626	133,852,898	9,547,918	7,903,257	14,228,933	37,971,498	19,933,453	44,267,839	-
Finance lease receivables	5,590,236	6,619,858	737,110	543,539	1,120,145	3,078,399	1,114,551	26,114	-
Financial assets measured at fair value through other items of comprehensive income	43,977,335	54,497,841	41,224,055	620,877	1,022,392	5,115,857	2,618,314	3,724,980	171,366
Financial assets which are required to be measured at fair value through profit or loss	1,469,014	1,543,962	845,813	1,786	3,572	93,667	116,117	-	483,007
Financial assets at amortized cost - debt instruments	22,401,071	25,315,316	3,521,172	3,076,347	1,939,661	9,002,151	5,736,264	2,039,721	-
Other financial assets	2,327,367	2,489,897	2,247,224	146,086	95,267	57	-	1,263	-
Total financial assets	202,772,536	260,736,143	93,592,061	12,295,893	18,697,652	55,313,319	29,580,271	50,421,735	835,212
Net balance sheet position		67,485,534	(3,168,091)	(3,437,037)	827,365	8,545,896	19,408,426	44,473,763	835,212

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

c) *Liquidity risk (continued)*

Group - In RON thousand	Carrying amount	Gross value (inflow / outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
December 31, 2024									
Off-balance sheet									
Irrevocable commitments given	2,577,987	2,645,350	516,661	272,736	562,756	753,566	160,103	379,528	-
Financial and performance guarantees given	7,752,380	7,912,979	778,094	1,073,644	1,219,687	3,351,738	708,696	781,120	-
Notional amount of swap and forward contracts									
- Deliverable amounts	(6,968,973)	(6,968,973)	(3,087,072)	(862,256)	(1,478,910)	(994,615)	(546,120)	-	-
- Receivable amounts	13,977,322	13,977,321	3,118,180	874,974	1,530,996	3,579,061	3,847,522	1,026,588	-
Net position of derivatives	7,008,349	7,008,348	31,108	12,718	52,086	2,584,446	3,301,402	1,026,588	-
Total off-balance sheet	17,338,716	17,566,677	1,325,863	1,359,098	1,834,529	6,689,750	4,170,201	2,187,236	-
Total net on- and off-balance sheet position		49,918,857	(4,493,954)	(4,796,135)	(1,007,164)	1,856,146	15,238,225	42,286,527	835,212

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

c) Liquidity risk (*continued*)

The assets and liabilities of the Bank as at December 31, 2025, analyzed based on the period remaining until the contractual maturity, on models reflecting the customer's historic behavior typologies and on conventional assumptions concerning certain balance sheet items are the following:

Bank – In RON thousand	Carrying amount	Gross value (inflow / outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
Financial liabilities									
Deposits from banks	321,053	(321,059)	(272,853)	-	-	(48,206)	-	-	-
Deposits from customers	168,861,727	(169,837,807)	(94,944,270)	(15,355,944)	(15,938,321)	(37,716,327)	(5,031,497)	(851,448)	-
Loans from banks and other financial institutions	14,604,339	(17,542,446)	(295,094)	(409,305)	(564,113)	(9,230,430)	(5,283,288)	(1,760,216)	-
Subordinated liabilities and issued bonds	2,466,250	(3,355,501)	-	(88,002)	(88,486)	(1,760,884)	(179,692)	(1,238,437)	-
Financial liabilities held-for-trading	263,550	(263,550)	(7,829)	(10,307)	(13,166)	(68,687)	(133,660)	(29,901)	-
Lease liabilities	595,633	(647,983)	(38,021)	(36,323)	(75,698)	(255,523)	(175,585)	(66,833)	-
Other financial liabilities	2,084,359	(2,084,359)	(2,084,359)	-	-	-	-	-	-
Total financial liabilities	189,196,911	(194,052,705)	(97,642,426)	(15,899,881)	(16,679,784)	(49,080,057)	(10,803,722)	(3,946,835)	-
Financial assets									
Cash and current accounts with Central Banks	23,224,311	23,229,479	23,229,479	-	-	-	-	-	-
Placements with banks and public institutions	14,476,281	14,538,179	14,210,128	7,638	21,260	289,335	1,460	8,358	-
Financial assets at amortized cost - debt instruments	29,871,314	36,521,913	4,958,140	4,999,320	5,749,291	8,631,569	8,038,359	4,145,234	-
Derivatives	150,642	150,642	15,693	5,298	5,789	62,745	45,816	15,301	-
Equity instruments	22,330	22,330	11,165	-	-	-	-	-	11,165
Loans and advances to customers	99,691,081	142,586,257	11,100,763	7,959,973	21,397,307	37,163,149	19,019,938	45,945,127	-
Financial assets measured at fair value through other items of comprehensive income	33,850,743	38,121,966	29,067,355	516,270	873,144	3,435,154	1,705,876	2,498,219	25,948
Financial assets which are required to be measured at fair value through profit or loss	2,645,584	2,891,215	1,558,744	4,671	9,342	186,396	25,692	204,349	902,021
Equity investments	1,373,464	1,373,464	-	-	-	-	-	-	1,373,464
Other financial assets	1,826,066	1,914,771	1,590,790	304,315	19,666	-	-	-	-
Total financial assets	207,131,816	261,350,216	85,742,257	13,797,485	28,075,799	49,768,348	28,837,141	52,816,588	2,312,598
Net balance sheet position		67,297,511	(11,900,169)	(2,102,396)	11,396,015	688,291	18,033,419	48,869,753	2,312,598

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

c) Liquidity risk (*continued*)

Bank – In RON thousand December 31, 2025 Off-balance sheet	Carrying amount	Gross value (inflow / outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
Irrevocable commitments given based on expected cash flow	997,629	1,019,091	36,691	5,787	117,308	859,305	-	-	-
Financial and performance guarantees given based on expected cash flow	8,772,391	8,918,196	880,340	1,028,479	2,663,670	2,966,604	506,526	872,577	-
Notional amount of swap and forward contracts									
- Deliverable amounts	(5,189,683)	(5,189,683)	(2,744,885)	(412,512)	(103,741)	(1,132,225)	(796,320)	-	-
- Receivable amounts	13,490,549	13,490,549	2,918,660	538,579	925,641	3,484,857	4,410,414	1,212,398	-
Net position of derivatives	8,300,866	8,300,866	173,775	126,067	821,900	2,352,632	3,614,094	1,212,398	-
Total off-balance sheet	18,070,886	18,238,153	1,090,806	1,160,333	3,602,878	6,178,541	4,120,620	2,084,975	-
Total net on- and off-balance sheet position		49,059,358	(12,990,975)	(3,262,729)	7,793,137	(5,490,250)	13,912,799	46,784,778	2,312,598

Compared to 2024, the volume of attracted resources (customers and banks) for the Bank on December 31, 2025 increased from RON 151,959,032 thousand to RON 169,182,780 thousand. A significant mismatch is observed on over 5 years, due to the fact that most of the resources consists of attracted deposits of clients, whose maturities are less than 5 years.

The negative gaps between various balance sheet and off-balance sheet items, as they are presented above, are easy to manage due to the financial assets measured at fair value through other comprehensive income, which ensure a high level of flexibility through their diversification and possibility of trading on an active and liquid market.

In order to cover currency gaps, liquidity management is adapted and permanently adjusted to the conditions of the Romanian and international financial-banking market, as well as the general economic context.

In liquidity management, the Group and the Bank apply a series of principles regarding the quality, maturity, diversity and degree of risk of assets and liabilities, as follows:

- apply the rule of a diversified investment portfolio, taking into account the inverse correlation between the degree of risk and the degree of liquidity;
- will establish minimum and/or maximum levels accepted for the significant categories of investments, paying particular attention to liquid assets, easily liquidable or that fulfill the quality of assets eligible for guarantee;
- establish the funding structure periodically, adapted to its development needs
- is committed to developing long-term correspondent relationships that can ensure easy and secure access to funding sources, both in the short term, as well as in the medium and long term;

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

c) Liquidity risk (continued)

The assets and liabilities of the Bank as at December 31, 2024, analyzed based on the period remaining until the contractual maturity, on models reflecting the customer's historic behavior typologies and on conventional assumptions concerning certain balance sheet items are the following:

Bank – In RON thousand	Carrying amount	Gross value (inflow / outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
Financial liabilities									
Deposits from banks	1,173,778	(1,174,095)	(1,053,560)	-	(24,871)	(95,664)	-	-	-
Deposits from customers	150,785,254	(151,743,720)	(81,553,844)	(13,077,055)	(15,246,753)	(36,815,257)	(4,407,239)	(643,572)	-
Loans from banks and other financial institutions	11,209,491	(13,849,922)	(180,320)	(415,769)	(446,235)	(5,535,323)	(3,641,507)	(3,630,768)	-
Subordinated liabilities and issued bonds	2,405,137	(3,507,637)	-	(91,506)	(92,009)	(367,031)	(1,645,051)	(1,312,040)	-
Financial liabilities held-for-trading	235,283	(235,283)	(16,552)	(1,050)	(10,750)	(65,926)	(109,937)	(31,068)	-
Lease liabilities	747,857	(812,588)	(39,058)	(38,773)	(79,217)	(273,213)	(199,471)	(182,856)	-
Other financial liabilities	2,582,891	(2,582,891)	(2,582,891)	-	-	-	-	-	-
Total financial liabilities	169,139,691	(173,906,136)	(85,426,225)	(13,624,153)	(15,899,835)	(43,152,414)	(10,003,205)	(5,800,304)	-
Financial assets									
Cash and current accounts with Central Banks	16,908,360	16,911,029	16,911,029	-	-	-	-	-	-
Placements with banks and public institutions	13,612,057	13,949,776	12,217,071	-	311,622	1,076,510	-	344,573	-
Financial assets at amortized cost - debt instruments	19,376,763	22,007,213	2,520,677	2,627,585	1,236,475	8,547,169	5,412,662	1,662,645	-
Derivatives	155,572	155,572	21,514	3,065	3,124	50,552	60,072	17,245	-
Equity instruments	17,833	17,833	8,916	-	-	-	-	-	8,917
Loans and advances to customers	81,389,989	117,295,007	8,423,618	6,920,234	12,955,798	35,198,979	17,686,569	36,109,809	-
Financial assets measured at fair value through other items of comprehensive income	43,151,498	53,586,456	40,602,592	612,522	1,019,052	5,021,049	2,583,883	3,724,578	22,780
Financial assets which are required to be measured at fair value through profit or loss	2,015,434	2,090,383	1,177,009	1,786	3,572	93,667	116,117	-	698,232
Equity investments	2,644,703	2,644,703	-	-	-	-	-	-	2,644,703
Other financial assets	2,013,078	2,101,071	1,862,471	143,333	95,267	-	-	-	-
Total financial assets	181,285,287	230,759,043	83,744,897	10,308,525	15,624,910	49,987,926	25,859,303	41,858,850	3,374,632
Net balance sheet position		56,852,907	(1,681,328)	(3,315,628)	(274,925)	6,835,512	15,856,098	36,058,546	3,374,632

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

c) *Liquidity risk (continued)*

Bank – In RON thousand	Carrying amount	Gross value (inflow / outflow)	Up to 3 months	3-6 months	6-12 months	1-3 years	3 - 5 years	Over 5 years	No maturity
December 31, 2024									
Off-balance sheet									
Irrevocable commitments given based on expected cash flow	266,534	274,212	5,802	611	145,859	121,940	-	-	-
Financial and performance guarantees given based on expected cash flow	6,938,527	7,086,843	591,749	982,930	1,071,973	3,205,199	674,206	560,786	-
Notional amount of swap and forward contracts									
- Deliverable amounts	(5,656,030)	(5,656,030)	(1,759,005)	(877,380)	(1,478,910)	(994,615)	(546,120)	-	-
- Receivable amounts	12,349,635	12,349,635	1,771,589	889,896	1,521,611	3,371,893	3,768,058	1,026,588	-
Net position of derivatives	6,693,605	6,693,605	12,584	12,516	42,701	2,377,278	3,221,938	1,026,588	-
Total off-balance sheet	13,898,666	14,054,660	610,135	996,057	1,260,533	5,704,417	3,896,144	1,587,374	-
Total net on- and off-balance sheet position		42,798,247	(2,291,463)	(4,311,685)	(1,535,458)	1,131,095	11,959,954	34,471,172	3,374,632

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk

Market risk represents the risk that the earnings of the Group and the Bank or the value of financial instruments held may be negatively affected by adverse market changes in interest rates, foreign exchange rates or other financial ratios. The objective of market risk management is to monitor and maintain financial instrument portfolio exposures within acceptable risk parameters, while optimizing the return on investments.

d1) Interest rate risk from the banking book

Interest rate risk represents the current or future risk for profit and capital to be negatively affected as a result of adverse changes in interest rates. The Group and the Bank undertake the interest rate risk resulting from funds raised and placed in relation to non-bank customers (interest rate risk from banking activities).

The main sources of interest rate risk are represented by the imperfect correlation between maturity dates (for fixed interest rate instruments) or repricing dates (for variable interest rate instruments) of interest sensitive assets and liabilities, as well as adverse changes of the yield curve (non-parallel shift of interest rate curves related to interest bearing assets and liabilities).

The management of interest bearing assets and liabilities is carried out in the context of the Group's/the Bank's exposure to interest rate fluctuations. The Group and the Bank use a mix of fixed and variable interest bearing instruments to control the mismatch between the dates on which the interest on assets and liabilities is adjusted to the market rates or the maturity mismatch between assets and liabilities.

Interest rate risk is managed primarily by monitoring the interest rate GAP (repricing mismatches) and through a well-diversified system of limits and indicators. The Asset and Liability Management Committee is the body that monitors compliance with these limits, being assisted in this process by the Treasury Department.

The management of interest rate risk through interest rate gap analysis is supplemented by limits on the impact on the economic value of capital and on the sensitivity of the Group's net interest income to the standard interest rate scenarios, considering the shocks set out in Commission Delegated Regulation (EU) 2024/856 of 1 December 2023.

As at 31 December 2025 and 31 December 2024, the exposure to interest rate risk related to the banking book portfolio of the Group and the Bank is presented below:

	Group		Bank	
	Weight in total assets/liabilities - banking book			
Structure, RON thousand	2025 (*)	2024	2025(*)	2024
Assets with fixed IR	61.23%	48.66%	60.69%	50.45%
Assets with floating IR	38.77%	51.34%	39.31%	49.55%
Liabilities with fixed IR	94.86%	49.42%	97.72%	50.91%
Liabilities with floating IR	5.14%	50.58%	2.28%	49.09%

	Group		Bank	
Structure, RON thousand	2025 (*)	2024	2025 (*)	2024
Assets with fixed IR	131,350,348	105,671,468	121,748,805	92,665,530
Assets with floating IR	83,171,623	111,511,739	78,845,814	91,007,392
Liabilities with fixed IR	184,254,697	99,251,036	180,916,055	87,940,160
Liabilities with floating IR	9,977,427	101,590,841	4,212,893	84,799,700

(*) In 2025, a new calculation methodology was adopted regarding the Interest Rate Risk in the Banking Book portfolio (IRRBB).

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

d) *Market risk (continued)*

d1) *Interest rate risk from the banking book (continued)*

The following tables provide an analysis of the exposure to interest rate risk for the financial assets and liabilities included in the banking book portfolio. Interest-rate-sensitive assets and liabilities in the banking book are presented at carrying amount and classified according to their contractual repricing dates (indexation dates for variable-rate products) or maturity dates (for fixed-rate products). The table below details the Group's interest rate gap for the banking book portfolio of assets and liabilities as of 31 December 2025:

<i>In RON thousand</i>	Up to 6 months	6 - 12 months	1-3 years	3 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Cash and current accounts with Central Banks	25,499,275	-	-	-	-	-	25,499,275
Placements with banks and public institutions	16,283,697	103,577	117,475	39,555	7,988	2	16,552,294
Financial assets compulsorily measured at fair value through profit and loss	173,517	-	-	-	-	-	173,517
Financial assets measured at amortized cost - debt instruments	9,147,417	5,739,056	6,533,221	7,124,941	3,395,171	-	31,939,806
Financial assets measured at fair value through other items of comprehensive income	30,528,215	294,905	1,528,708	535,096	669,171	-	33,556,095
Loans and advances to customers	53,972,138	15,707,935	23,982,273	5,922,546	861,115	-	100,446,007
Finance lease receivables	5,292,870	123,710	468,983	377,471	865	-	6,263,899
Other financial assets	885,549	19,187	-	-	-	1,115,076	2,019,812
Total financial assets	141,782,678	21,988,370	32,630,660	13,999,609	4,934,310	1,115,078	216,450,705
Financial liabilities							
Deposits from banks	253,641	-	48,206	-	-	-	301,847
Deposits from customers	147,297,043	23,221,114	4,614,918	43,810	72,925	-	175,249,810
Loans from banks and other financial institutions, subordinated debt and issued bonds	4,946,230	267,239	8,389,027	4,665,296	1,498,286	-	19,766,078
Lease liabilities	94,336	68,124	236,306	169,101	56,499	-	624,366
Other financial liabilities	1,347,904	3,405	9,836	6,097	370	2,079,092	3,446,704
Total financial liabilities	153,939,154	23,559,882	13,298,293	4,884,304	1,628,080	2,079,092	199,388,805
Net position	(12,156,476)	(1,571,512)	19,332,367	9,115,305	3,306,230	(964,014)	17,061,900
Irrevocable commitments given	88,865	217,042	1,389,703	483,163	101,133	-	2,279,906
Financial and performance guarantees given	1,881,213	2,643,424	2,963,421	503,611	863,530	-	8,855,199
Total off-balance sheet	1,970,078	2,860,466	4,353,124	986,774	964,663	-	11,135,105
Net position on- and off-balance sheet	(10,186,398)	1,288,954	23,685,491	10,102,079	4,270,893	(964,014)	28,197,005

The explanatory notes to the financial statements from page 11 to page 184 are an integral part of these financial statements.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

d) *Market risk (continued)*

d1) *Interest rate risk from the banking book (continued)*

The table below details the Group's interest rate gap for the banking book portfolio of assets and liabilities as of 31 December 2024:

<i>In RON thousand</i>	Up to 6 months	6 - 12 months	1-3 years	3 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Cash and current accounts with Central Banks	21,950,170	-	-	-	-	-	21,950,170
Placements with banks and public institutions	13,706,891	-	-	-	7,979	-	13,714,870
Financial assets measured at amortized cost - debt instruments	6,938,210	1,304,576	7,634,501	4,925,764	1,598,020	-	22,401,071
Financial assets measured at fair value through other items of comprehensive income	37,706,024	159,806	2,162,621	928,027	962,800	-	41,919,278
Loans and advances to customers	54,888,536	6,859,201	19,550,884	8,877,381	603,624	-	90,779,626
Finance lease receivables	1,127,941	890,269	2,557,423	992,288	22,315	-	5,590,236
Other financial assets	869,143	84,480	57	-	-	1,373,687	2,327,367
Total financial assets	137,186,915	9,298,332	31,905,486	15,723,460	3,194,738	1,373,687	198,682,618
Financial liabilities							
Deposits from banks	830,620	24,871	95,664	-	-	-	951,155
Deposits from customers	137,142,702	22,473,990	8,191,105	7,872	53,597	-	167,869,266
Loans from banks and other financial institutions, subordinated debt and issued bonds	3,949,071	223,656	4,073,767	3,069,435	3,452,322	-	14,768,251
Lease liabilities	114,424	61,952	212,052	151,270	77,800	-	617,498
Other financial liabilities	1,185,296	4,103	53	-	-	2,578,258	3,767,710
Total financial liabilities	143,222,113	22,788,572	12,572,641	3,228,577	3,583,719	2,578,258	187,973,880
Net position	(6,035,198)	(13,490,240)	19,332,845	12,494,883	(388,981)	(1,204,571)	10,708,738
Irrevocable commitments given	771,084	545,615	737,208	153,925	370,155	-	2,577,987
Financial and performance guarantees given	1,796,647	1,180,806	3,310,643	695,916	768,368	-	7,752,380
Total off-balance sheet	2,567,731	1,726,421	4,047,851	849,841	1,138,523	-	10,330,367
Net position on- and off-balance sheet	(3,467,467)	(11,763,819)	23,380,696	13,344,724	749,542	(1,204,571)	21,039,105

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

d) *Market risk (continued)*

d1) *Interest rate risk from the banking book (continued)*

The table below details the Bank's interest rate gap for the banking book portfolio of assets and liabilities as of 31 December 2025:

<i>In RON thousand</i>	Up to 6 months	6 - 12 months	1-3 years	3 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Cash and current accounts with Central Banks	23,224,311	-	-	-	-	-	23,224,311
Placements with banks and public institutions	14,468,291	-	-	-	7,988	2	14,476,281
Financial assets at amortized cost - debt instruments	7,811,511	5,018,564	6,525,607	7,121,199	3,394,433	-	29,871,314
Financial assets measured at fair value through other items of comprehensive income	30,026,975	290,338	1,508,879	525,425	668,998	-	33,020,615
Loans and advances to customers	57,556,750	15,195,249	21,757,863	5,009,213	172,006	-	99,691,081
Net lease investments	-	-	-	-	-	-	-
Other financial assets	679,248	19,187	-	-	-	1,127,631	1,826,066
Total financial assets	133,767,086	20,523,338	29,792,349	12,655,837	4,243,425	1,127,633	202,109,668
Financial liabilities							
Deposits from banks	272,847	-	48,206	-	-	-	321,053
Deposits from customers	143,001,410	22,790,723	2,952,859	43,810	72,925	-	168,861,727
Loans from banks and other financial institutions, subordinated debt and issued bonds	3,052,781	175,704	7,765,280	4,583,039	1,493,785	-	17,070,589
Lease liabilities	66,154	68,175	233,991	166,272	61,041	-	595,633
Other financial liabilities	-	-	-	-	-	2,084,359	2,084,359
Total financial liabilities	146,393,192	23,034,602	11,000,336	4,793,121	1,627,751	2,084,359	188,933,361
Net position	(12,626,106)	(2,511,264)	18,792,013	7,862,716	2,615,674	(956,726)	13,176,307
Irrevocable commitments given	26,432	116,699	854,498	-	-	-	997,629
Financial and performance guarantees given	1,864,403	2,633,643	2,913,312	497,503	863,530	-	8,772,391
Total off-balance sheet	1,890,835	2,750,342	3,767,810	497,503	863,530	-	9,770,020
Net position on- and off-balance sheet	(10,735,271)	239,078	22,559,823	8,360,219	3,479,204	(956,726)	22,946,327

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

d) *Market risk (continued)*

d1) *Interest rate risk from the banking book (continued)*

The table below details the Bank's interest rate gap for the banking book portfolio of assets and liabilities as of 31 December 2024:

<i>In RON thousand</i>	Up to 6 months	6 - 12 months	1-3 years	3 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Cash and current accounts with Central Banks	16,908,360	-	-	-	-	-	16,908,360
Placements with banks and public institutions	13,569,807	24,771	9,500	-	7,979	-	13,612,057
Financial assets at amortized cost - debt instruments	5,510,513	653,766	7,259,822	4,661,047	1,291,615	-	19,376,763
Financial assets measured at fair value through other items of comprehensive income	37,093,548	159,068	2,120,002	909,875	962,637	-	41,245,130
Loans and advances to customers	51,874,660	4,671,180	16,452,501	8,228,130	163,518	-	81,389,989
Net lease investments	-	-	-	-	-	-	-
Other financial assets	539,230	84,480	-	-	-	1,389,368	2,013,078
Total financial assets	125,496,118	5,593,265	25,841,825	13,799,052	2,425,749	1,389,368	174,545,377
Financial liabilities							
Deposits from banks	1,053,243	24,871	95,664	-	-	-	1,173,778
Deposits from customers	124,692,066	21,117,201	4,972,463	592	2,932	-	150,785,254
Loans from banks and other financial institutions, subordinated debt and issued bonds	2,890,083	131,601	4,071,187	3,069,435	3,452,322	-	13,614,628
Lease liabilities	69,337	71,250	248,526	185,454	173,290	-	747,857
Other financial liabilities	-	-	-	-	-	2,582,891	2,582,891
Total financial liabilities	128,704,729	21,344,923	9,387,840	3,255,481	3,628,544	2,582,891	168,904,408
Net position	(3,208,611)	(15,751,658)	16,453,985	10,543,571	(1,202,795)	(1,193,523)	5,640,969
Irrevocable commitments given	6,410	139,645	120,479	-	-	-	266,534
Financial and performance guarantees given	1,523,024	1,035,008	3,168,459	663,143	548,893	-	6,938,527
Total off-balance sheet	1,529,434	1,174,653	3,288,938	663,143	548,893	-	7,205,061
Net position on- and off-balance sheet	(1,679,177)	(14,577,005)	19,742,923	11,206,714	(653,902)	(1,193,523)	12,846,030

The management of interest rate risk through interest rate gap analysis is supplemented by limits on the impact on the economic value of capital and on the sensitivity of the Group's net interest income to the standard interest rate scenarios, taking into account the shocks set out in Commission Delegated Regulation (EU) 2024/856 of 1 December 2023.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d1) Interest rate risk from the banking book (continued)

The sensitivity scenarios reflect the changes in the economic value of the assets and liabilities in the banking book, based on the assumption that interest rates move according to the prescribed interest rate scenarios. The sensitivity result for each scenario is calculated by comparing the present value of the Bank's assets and liabilities, discounted using the interest rate curve corresponding to the stress scenario, with the present value of the Bank's assets and liabilities discounted using the baseline interest rate curve. The present value of the banking book assets and liabilities is calculated by discounting the future cash flows generated by interest-rate-sensitive assets and liabilities, which are allocated into repricing time buckets according to the next interest rate reset date for variable-rate items, the contractual maturity for fixed-rate items, or the statistical model for items subject to behavioral modelling in accordance with Commission Delegated Regulation (EU) 2024/857 of 1 December 2023.

Starting from September 2024, the applicable interest rate shocks by currency follow Commission Delegated Regulation (EU) 2024/856 of 1 December 2023, supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to regulatory technical standards specifying supervisory shock scenarios, common modelling assumptions and parameters, and what constitutes a significant decline.

The table below presents the maximum impact of interest rate shocks on the Economic Value of Equity in Common Equity Tier 1, considering the new applicable interest rate shocks under Delegated Regulation (EU) 2024/856, for the Group and the Bank, for 2025 (short rate up scenario) and 2024 (parallel up scenario):

	Group		Bank	
	2025	2024 (*)	2025	2024 (*)
<i>Maximum impact of interest rate shocks on the Economic Value of Equity in Common Equity Tier 1</i>	7.20%	11.66%	7.24%	11.50%

In accordance with the recommendations of the European Banking Authority (EBA/GL/2022/14) and National Bank of Romania Regulation No. 5/2013, the measurement and monitoring of interest rate risk in the Bank's portfolio are performed from both an economic value perspective and a net interest income volatility perspective.

To estimate the impact of changes in yield curves on net interest income, the standard scenarios set out in Commission Delegated Regulation (EU) 2024/856 of 1 December 2023 have been applied. The assumptions are made under the premise of a constant balance sheet, meaning that each balance sheet item reaching maturity is replaced with an item of similar characteristics, using a one-year time horizon and parallel shocks.

The table below presents the maximum adverse impact of interest rate curve parallel shocks, with +/- 200bps on EUR and +/-350bps on RON, on Net Interest Income in absolute value and in Common Equity Tier 1, for the Group and the Bank, for 2025 (parallel up scenario) and 2024 (parallel down

<i>In RON thousand</i>	Group		Bank	
	2025	2024 (*)	2025	2024 (*)
<i>Maximum impact of interest rate curve shocks on Net Interest Income - Parallel shock +/- 200bps EUR ; +/-350bps RON</i>	(131,617)	(9,862)	(135,404)	39,994
<i>Maximum impact of interest rate curve shocks on Net Interest Income in Common Equity Tier 1 - Parallel shock +/- 200bps EUR; +/-350bps RON</i>	-0.67%	-0.06%	-0.75%	0.28%

scenario):

(*) To ensure comparability, the results for 2024 based on the IRRBB methodology are also presented.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d2) Currency risk

The Group and the Bank are exposed to currency risk through open positions generated by FX transactions. There is also a risk that the net values of monetary assets and liabilities in foreign currency may change, as a result of exchange rate variation.

The Group and the Bank manage the currency risk based both on classic approach as strict currency position and "stop-loss" limits monitored in real time but also based on VaR type calculations to assess possible changes in the assets and liabilities values.

The Group's monetary assets and liabilities denominated in RON and FCY at December 31, 2025 are presented below:

<i>In RON thousand</i>	RON	EUR	USD	Other currencies	Total
Monetary assets					
Cash and current accounts with Central Banks	16,894,761	6,807,093	274,337	1,523,084	25,499,275
Placements with banks and public institutions	10,929,933	2,174,753	2,801,781	645,827	16,552,294
Financial assets held for trading and measured at fair value through profit or loss	191,505	5,343	-	11,815	208,663
Derivatives	123,797	19,439	2,376	212	145,824
Loans and advances to customers	64,815,252	31,743,557	264,607	3,622,591	100,446,007
Finance lease receivables	65,770	6,170,765	-	27,364	6,263,899
Financial assets measured at fair value through other items of comprehensive income	22,212,915	10,497,348	1,380,599	271,377	34,362,239
Financial assets which are required to be measured at fair value through profit or loss	648,401	324,351	523,232	-	1,495,984
Financial assets at amortized cost - debt instruments	15,070,423	13,977,861	911,269	1,980,253	31,939,806
Other financial assets	1,721,165	229,156	45,661	23,830	2,019,812
Total monetary assets	132,673,922	71,949,666	6,203,862	8,106,353	218,933,803
Monetary liabilities					
Deposits from banks	294,045	4,702	767	2,333	301,847
Deposits from customers	112,553,935	51,146,297	6,193,928	5,355,650	175,249,810
Loans from banks and other financial institutions, subordinated debt	1,851,898	16,806,506	17,012	1,090,662	19,766,078
Financial liabilities held-for-trading	162,399	57,033	42,424	11	261,867
Lease liabilities	21,509	599,181	539	3,137	624,366
Other financial liabilities	2,182,152	888,793	272,677	103,082	3,446,704
Total monetary liabilities	117,065,938	69,502,512	6,527,347	6,554,875	199,650,672
Net currency position	15,607,984	2,447,154	(323,485)	1,551,478	19,283,131
Gross value of swap and forward contracts					
- Payable amounts	(1,788,633)	(3,010,339)	(64,271)	(326,440)	(5,189,683)
- Receivable amounts	4,321,737	7,274,800	1,435,782	263,413	13,295,732
Net position of derivatives	2,533,104	4,264,461	1,371,511	-63,027	8,106,049
Net on- and off-balance sheet position	18,141,088	6,711,615	1,048,026	1,488,451	27,389,180

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d2) Currency risk (continued)

The Group's monetary assets and liabilities denominated in RON and FCY at December 31, 2024 are presented below:

<i>In RON thousand</i>	RON	EUR	USD	Other currencies	Total
Monetary assets					
Cash and current accounts with Central Banks	12,464,650	7,900,838	309,268	1,275,414	21,950,170
Placements with banks and public institutions	7,586,834	4,184,369	1,123,848	819,819	13,714,870
Financial assets held for trading and measured at fair value through profit or loss	135,953	4,744	-	-	140,697
Derivatives	144,704	25,741	2,585	-	173,030
Loans and advances to customers	61,841,784	26,401,870	373,602	2,162,370	90,779,626
Finance lease receivables	94,830	5,470,048	-	25,358	5,590,236
Financial assets measured at fair value through other items of comprehensive income	29,114,855	12,127,644	2,437,878	125,592	43,805,969
Financial assets which are required to be measured at fair value through profit or loss	413,417	253,198	395,640	-	1,062,255
Financial assets at amortized cost - debt instruments	10,659,658	8,742,338	1,006,477	1,992,598	22,401,071
Other financial assets	1,933,055	301,398	49,535	43,379	2,327,367
Total monetary assets	124,389,740	65,412,188	5,698,833	6,444,530	201,945,291
Monetary liabilities					
Deposits from banks	918,252	25,986	998	5,919	951,155
Deposits from customers	109,896,957	46,869,592	6,286,204	4,816,513	167,869,266
Loans from banks and other financial institutions, subordinated debt	176,248	14,337,505	-	254,498	14,768,251
Financial liabilities held-for-trading	171,178	58,796	5,348	-	235,322
Lease liabilities	20,012	596,137	578	771	617,498
Other financial liabilities	2,657,022	831,462	175,186	104,040	3,767,710
Total monetary liabilities	113,839,669	62,719,478	6,468,314	5,181,741	188,209,202
Net currency position	10,550,071	2,692,710	(769,481)	1,262,789	13,736,089
Gross value of swap and forward contracts					
- Payable amounts	(1,458,853)	(5,044,715)	(82,758)	(382,647)	(6,968,973)
- Receivable amounts	5,520,537	6,797,412	872,483	786,890	13,977,322
Net position of derivatives	4,061,684	1,752,697	789,725	404,243	7,008,349
Net on- and off-balance sheet position	14,611,755	4,445,407	20,244	1,667,032	20,744,438

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d2) Currency risk (continued)

The Bank's monetary assets and liabilities denominated in RON and foreign currencies at December 31, 2025 are presented below:

In RON thousand	RON	EUR	USD	Other currencies	Total
Monetary assets					
Cash and current accounts with Central Banks	16,447,773	6,233,922	123,680	418,936	23,224,311
Placements with banks and public institutions	10,475,446	1,085,730	2,330,000	585,105	14,476,281
Financial assets at amortized cost - debt instruments	15,059,339	13,900,706	911,269	-	29,871,314
Derivatives	128,835	19,439	2,368	-	150,642
Loans and advances to customers	63,697,986	35,413,884	217,906	361,305	99,691,081
Financial assets measured at fair value through other items of comprehensive income	21,776,790	10,397,993	1,380,599	269,413	33,824,795
Financial assets which are required to be measured at fair value through profit or loss	1,117,302	596,414	523,232	-	2,236,948
Other financial assets	1,590,717	206,241	28,550	558	1,826,066
Total monetary assets	130,294,188	67,854,329	5,517,604	1,635,317	205,301,438
Monetary liabilities					
Deposits from banks	302,095	8,496	4,049	6,413	321,053
Deposits from customers	111,885,434	49,686,220	5,787,091	1,502,982	168,861,727
Loans from banks and other financial institutions, subordinated debt	1,847,397	15,223,192	-	-	17,070,589
Financial liabilities held-for-trading	164,093	57,033	42,424	-	263,550
Lease liabilities	19,936	575,158	539	-	595,633
Other financial liabilities	1,654,095	380,172	33,163	16,929	2,084,359
Total monetary liabilities	115,873,050	65,930,271	5,867,266	1,526,324	189,196,911
Net currency position	14,421,138	1,924,058	(349,662)	108,993	16,104,527
Gross value of swap and forward contracts					
- Payable amounts	(1,788,633)	(3,010,339)	(64,271)	(326,440)	(5,189,683)
- Receivable amounts	4,521,736	7,274,800	1,433,255	260,758	13,490,549
Net position of derivatives	2,733,103	4,264,461	1,368,984	(65,682)	8,300,866
Net on- and off-balance sheet position	17,154,241	6,188,519	1,019,322	43,311	24,405,393

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d2) Currency risk (continued)

The Bank's monetary assets and liabilities denominated in RON and foreign currencies at December 31, 2024 are presented below:

In RON thousand	RON	EUR	USD	Other currencies	Total
Monetary assets					
Cash and current accounts with Central Banks	9,505,994	7,088,570	101,371	212,425	16,908,360
Placements with banks and public institutions	8,140,450	3,783,401	879,638	808,568	13,612,057
Financial assets at amortized cost - debt instruments	10,029,574	8,340,712	1,006,477	-	19,376,763
Derivatives	129,884	23,103	2,585	-	155,572
Loans and advances to customers	53,269,953	27,601,122	236,442	282,472	81,389,989
Financial assets measured at fair value through other items of comprehensive income	28,639,172	11,929,179	2,437,878	122,489	43,128,718
Financial assets which are required to be measured at fair value through profit or loss	818,058	434,341	389,698	-	1,642,097
Other financial assets	1,738,833	236,787	36,980	478	2,013,078
Total monetary assets	112,271,918	59,437,215	5,091,069	1,426,432	178,226,634
Monetary liabilities					
Deposits from banks	884,664	275,812	8,827	4,475	1,173,778
Deposits from customers	101,868,300	42,300,285	5,442,492	1,174,177	150,785,254
Loans from banks and other financial institutions, subordinated debt	164,394	13,450,234	-	-	13,614,628
Financial liabilities held-for-trading	172,348	57,587	5,348	-	235,283
Lease liabilities	17,046	730,374	437	-	747,857
Other financial liabilities	2,210,207	323,628	32,965	16,091	2,582,891
Total monetary liabilities	105,316,959	57,137,920	5,490,069	1,194,743	169,139,691
Net currency position	6,954,959	2,299,295	(399,000)	231,689	9,086,943
Gross value of swap and forward contracts					
- Payable amounts	(1,223,977)	(3,983,260)	(273,830)	(174,963)	(5,656,030)
- Receivable amounts	5,520,537	6,243,223	585,875	-	12,349,635
Net position of derivatives	4,296,560	2,259,963	312,045	(174,963)	6,693,605
Net on- and off-balance sheet position	11,251,519	4,559,258	(86,955)	56,726	15,780,548

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d2) Currency risk (continued)

By determining and monitoring the net FCY positions and the exchange rate volatility, the Bank has aimed to create a portfolio that is optimally correlated in terms of FCY assets and liabilities, as well as a balanced approach to trading operations on the foreign exchange market.

The table below presents the Profit/Loss sensitivity in the event of potential changes of the exchange rates applicable at the end of the reporting period in relation to the functional currency of the Group entities, considering that all the other variables remain constant:

<i>In RON thousand</i>	Impact on Profit or Loss	
	2025	2024
EUR increase by up to 20%	252,235	58,165
EUR decrease by up to 20%	(252,235)	(58,165)
USD increase by up to 20%	10,637	(1,985)
USD decrease by up to 20%	(10,637)	1,985

d3) Market risk related to trading activity

The main purpose of market risk management is to achieve the expected performance of the trading portfolio, with a proper management of the inherent market risk, consciously assumed and adapted to the market conditions and development of the Group and the Bank, and last but not least to the current legal framework.

General principles applied in order to ensure the adequate management of market risk are:

- Market risk management is adapted and adjusted constantly to the Romanian and the international financial and banking market conditions and to the general economic context.
- In the management of market risk, the Bank applies clear principles regarding the quality, maturity, diversity and risk degree of the component elements.
- Price risk is analyzed within the stress tests operated on the bonds, equities and fund units portfolios held by the Bank.

The Group and the Bank manage the exposure to market risk by monitoring on a daily basis the market value of the trading book in relation to a system of risk limits approved by the Assets and Liabilities Committee. Trading book includes sovereign, corporate and municipal bonds, denominated mainly in RON, EUR and USD, as well as equities issued by Romanian entities traded on the Bucharest Stock Exchange and fund units issued by Romanian entities.

Exposure to market risk related to trading activities

The market risk exposure relates mainly to the following balance sheet items:

- Held-for-trading financial assets measured at fair value through profit or loss;
- Derivatives;
- Financial assets which are required to be measured at fair value through profit or loss;
- Financial assets measured at fair value through other items of comprehensive income.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

d) Market risk (continued)

d3) Market risk related to trading activity (continued)

Exposure to market risk related to trading activities (continued)

The risk exposure on a consolidated and separate basis as at December 31, 2025, respectively December 31, 2024 is presented below:

In RON thousand		Group		Bank	
Assets	Notes	2025 Carrying amount	2024 Carrying amount	2025 Carrying amount	2024 Carrying amount
Held-for-trading financial assets measured at fair value through profit or loss	21	208,663	140,697	-	-
Derivatives	43	145,824	173,030	150,642	155,572
Financial assets which are required to be measured at fair value through profit or loss	21	1,322,467	1,062,255	2,236,948	1,642,097
Financial assets measured at fair value through other items of comprehensive income	24	806,144	1,886,691	804,180	1,883,588
Total on-balance sheet		2,483,098	3,262,673	3,191,770	3,681,257

The following table presents the sensitivity impact of a possible change in interest rates of +/- 1.00% and a decrease in market prices of +/- 10% at equity level and P&L level, considering that all the other variables remain constant:

Group	December 31, 2025		December 31, 2024	
	Impact in profit or loss	Impact in equity	Impact in profit or loss	Impact in equity
In RON thousand				
Equities	(2,313)	-	(1,887)	-
Fund units	(178,333)	-	(130,558)	-
Bonds	-	(895,967)	-	(1,237,667)
Total impact	(180,646)	(895,967)	(132,445)	(1,237,667)

Bank	December 31, 2025		December 31, 2024	
	Impact in profit or loss	Impact in equity	Impact in profit or loss	Impact in equity
In RON thousand				
Equities	(2,233)	-	(1,783)	-
Fund units	(173,168)	-	(127,891)	-
Bonds	-	(890,457)	-	(1,236,509)
Total impact	(175,401)	(890,457)	(129,674)	(1,236,509)

e) Capital management

The Bank's Board of Directors approves the conceptual design of the internal process for the assessment of the capital adequacy to risks, at least the scope, methodology and general objectives, and establishes the strategy regarding the internal capital planning, own funds and the capital adequacy to risks in Banca Transilvania S.A..

The Board of Directors makes decisions regarding the directions to be followed within the capital adequacy process, establishes the main projects in the field to be implemented, as well as the main objectives to be met for the best control of the correlation of the risks to which the Bank is exposed, the necessary shareholders' equity required to cover them and the development of sound risk management systems. The National Bank of Romania monitors capital requirements both at Group and Bank level.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

e) Capital management (continued)

Capital adequacy is determined according to the Regulation (EU) No 575/2013 of the European Parliament and of the Council and requires a minimum mandatory own funds level of:

- 4.5% for core tier 1 own funds;
- 6.0% for tier 1 own funds;
- 8.0% for total own funds.

Likewise, pursuant to the regulated approaches for the determination of the minimum capital requirements and the EU Regulation 575/2013 corroborated with the provisions of the NBR Regulation 5/2013 and considering the capital buffers required by the NBR, the Group and the Bank maintain:

- a capital preservation buffer of 2.5% of the total value of the risk-weighted exposures between January 1, 2024- December 31, 2025;
- an O-SII buffer of 2.5% of the total risk weighted exposures;
- the value of systemic risk buffer is 0% of the value of the risk-weighted exposures;
- the anticyclical capital buffer specific to the institution of 1% of the value of the risk-weighted exposures valid starting from 23 October 2023.

Own funds adequacy

The Group and the Bank use the following calculation methods in order to determine own fund requirements:

- Credit risk: standardized method;
- Market risk: capital requirements with respect to the foreign exchange risk and the trading portfolio are calculated based on the standard method;
- Operational risk: own fund requirements for the coverage of operational risk are calculated according to the base method.

The Group and the Bank comply with the above regulations. The level of the capital adequacy ratio exceeds the minimum mandatory requirements imposed by the law.

As at December 31, 2025 and December 31, 2024, as well as during the years 2025 and 2024, the Group and the Bank complied with all the capital adequacy requirements. Under the current capital requirements set by the European Banking Authority, banks have to maintain a ratio of regulatory capital to risk weighted assets ("statutory capital ratio") above a prescribed minimum level. The amount of capital that the Group managed was RON 21,462,272 thousand as of December 31, 2025 (2024: RON 18,809,175 thousand), regulatory capital amounts to RON 13,878,494 thousand as of December 2025 (2024: RON 11,861,816 thousand) and the Group and the Bank have complied with all externally imposed capital requirements throughout 2025 and 2024.

According to the applicable legal requirements on regulatory capital, the Group's and the Bank's own funds include:

- Tier I, which includes subscribed and paid in capital, share premiums, eligible reserves, additional equity instruments, retained earnings and deductions laid down in the applicable legal provisions;
- Tier II own funds, which include subordinated loans and deductions laid down in the applicable legal provisions.

The Group and the Bank manage their capital base in a flexible manner, by monitoring regulatory capital requirements, by anticipating the adequate adjustments required for the achievement of its objectives as well as by optimizing the structure of assets and shareholders' equity. The planning and monitoring activity takes into consideration the total own funds, on the one hand and the requirements of own funds, on the other hand.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

e) Capital management (continued)

The level and the requirements of own funds as at December 31, 2025 and December 31, 2024 are as follow:

	Group		Bank	
In RON thousand	2025	2024	2025	2024
Base Tier 1 own funds	17,003,378	16,707,830	15,416,058	14,413,233
Additional Tier 1 own funds	2,545,150	-	2,545,150	-
Tier 1 own funds	19,548,528	16,707,830	17,961,208	14,413,233
Tier 2 own funds	1,913,744	2,101,345	1,738,551	1,978,386
Total own funds	21,462,272	18,809,175	19,699,759	16,391,619
Credit risk exposure	77,675,931	67,580,852	67,688,591	53,226,913
Market risk, FX risk, delivery risk exposure	5,653,278	3,485,447	4,879,502	3,270,168
Operational risk exposure	15,703,225	16,645,635	14,088,049	12,562,492
Risk exposure for the adjustment of credit assessment	99,665	153,368	99,595	146,818
Total risk exposure	99,132,099	87,865,302	86,755,737	69,206,391

The capital adequacy ratio is calculated as a ratio between own funds and total risk-weighted assets:

	Group		Bank	
In %	2025	2024	2025	2024
Core tier one ratio	17.15	19.02	17.77	20.83
Tier 1 ratio	19.72	19.02	20.70	20.83
CAR	21.65	21.41	22.71	23.69

Note: The calculation of the Group's and the Bank's own funds includes the statutory profits of the Group, respectively of the Bank, for the year 31 December 2024. For the twelve-month period ended on December 31, 2025, the current profit realized on June 30, 2025 was taken into account in the calculation of own funds. The calculation of the regulated capital as of December 31, 2025 and December 31, 2024 was carried out according to the IFRS standards adopted by the European Union.

In May 2024, the European Parliament and the Council adopted Regulation (EU) 2024/1623 amending Regulation (EU) No 575/2013 with respect to requirements for credit risk, credit valuation adjustment (CVA) risk, operational risk, and market risk (hereinafter referred to as CRR3), as well as Directive (EU) 2024/1619 amending Directive 2013/36/EU with respect to supervisory powers, sanctions, third-country branches, and environmental, social and governance (ESG) risks. The aforementioned Regulation and Directive reflect the implementation of the final Basel III reform package within the European Union. CRR3 entered into force on 1 January 2025 and is applicable to prudential reporting as of the reference date of 31 March 2025, while CRD6 is expected to be transposed into national legislation by January 2026, i.e. within 18 months from its entry into force on 9 July 2024.

Changes introduced by CRR3 regarding the calculation of risk-weighted assets are:

- Credit risk (standardized approach) – more detailed requirements regarding exposure classification, treatment of collateral, and use of external ratings;
- Operational risk (standardized approach) – the change involves combining business indicators with historical losses;
- Credit valuation adjustment (CVA) risk – implementation of simplified methods for portfolios with low exposures;
- Market risk – the regulatory framework has been revised to adopt the FRTB (Fundamental Review of the Trading Book) standards, with applicability postponed until 2027.

With regard to the impact of these changes on key capital adequacy indicators, the institution has maintained levels well above the minimum regulatory requirements applicable to Banca Transilvania, both on an individual and consolidated basis, without recording any significant impact from the implementation of the new rules. The transposition of CRD6 takes into account measures for integrating environmental, social, and governance (ESG) risks into the governance framework and risk management processes, as well as strengthening internal oversight mechanisms. With a view to the implementation of CRD6 in 2026, the Bank is monitoring legislative developments and analysing the potential impact on governance and risk management processes. Based on the information available, no significant impact on capital adequacy indicators is anticipated.

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (continued)

f) Operational risk

Operational risk is the risk that considers those inadequate practices, policies and systems unable to prevent a loss due to market conditions or operational difficulties.

The objective of the operational risk management is to ensure the general framework and action directions for establishing a complete risk management in Banca Transilvania Financial Group, by integrating a specific management system in the current risk management processes.

BT aims to continuously improve the risk management processes by working towards an integrated risk management system to support the decision-making process. The operational risk management framework implemented at the level of the entire group is in accordance with the established business objectives and the assumed risk appetite, as well as with the observance with the provisions of the legislation in the field and of the internal regulations in force.

In order to identify, evaluate, monitor and reduce the banking operational risk, Banca Transilvania S.A.:

- continuously assesses exposures to operational risk, based on historical data, monitoring and managing the conduct risk, as a subcategory of the operational risk, as well as the risk determinants associated with this category, paying particular attention to its scope, relevance and the possible prudential impact;
- evaluates and monitors products, processes and systems aimed for developing new markets, products and services, as well as significant changes to existing ones and the conduct of exceptional transactions, from the perspective of product consistency and changes in line with the risk strategy;
- identifies, assesses, monitors and manages the risks associated with information technology (ICT), the bank has appropriate processes and controls in place to ensure that all risks are identified, analyzed, measured, monitored, managed, reported and maintained within the risk appetite and that the projects and systems they deliver and the activities they perform are in line with the external and internal requirements;

The Bank also defines and assigns relevant roles, key responsibilities and reporting lines to ensure the effectiveness of the ICT and Security Risk Management Framework, which is integrated into its own regulatory framework, operational framework for ICT security and into the risk management framework. In order to reduce the risks inherent in the bank's operational activity, it is necessary to constantly monitor the controls implemented at different levels, to evaluate their efficiency, as well as to introduce methods to reduce the effects of the operational risk events.

The strategy of the Group to diminish the exposure to operational risks is mainly based on:

- constant compliance of the normative documents with the legal regulations and to the market conditions;
- personnel training;
- efficiency of the internal control systems (organization and implementation);
- continuous improvement of the IT solutions and strengthening of BT information security systems;
- using complementary means to reduce risks: concluding specific insurance policies against risks, outsourcing activities;
- the implementation of the measures for the limitation and reduction of the effects of the identified operational risk incidents, such as: standardization of the current activity, automation of most processes with permanently monitored control points; reduction of redundant data volumes collected at the level of different entities of the bank; assessment of the products, processes and systems in order to determine the associated risks and measures to eliminate / mitigate them;

Notes to the consolidated and separate financial statements

4. Financial risk management and other significant risk management (*continued*)

f) Operational risk (*continued*)

- the application of the recommendations and the conclusions resulting from on-going supervision;
- the update, evaluation and testing of business continuity plans on a regular basis, in particular of those systems that support the critical operational processes of the Group and the Bank.

The operational risk assessment process is closely correlated with the overall risk management process. Its outcome is part of the operational risk monitoring and control processes and is constantly compared to the risk appetite established by the risk management strategy.

g) The management of the environmental, social and governance (ESG) risks

For aligning with the climate neutrality objectives, at least annually the Bank assesses the ESG factors, their materiality related to the development objectives and specific strategies (e.g. business, risk, sustainability, sectoral, etc.), through an integrated ESG risk management framework, applying a differentiated system of indicators (depending on the importance/ relevance/ granularity, etc), aimed at ensuring the Bank's ESG engagements and the compliance with the regulatory framework and operational efficiency. Without being exhaustive, it implies:

- Strengthening institutional collaborations, both at European (e.g. IFC, EBRD, etc.) and national (BID) level, aiming to support sustainable economic development and ESG-related initiatives;
- Promoting financial inclusion and impact financing, by providing green, social or sustainable products;
- Continuously updating the ESG risk management framework, based on the recommendations of the competent authorities, international bodies and market standards, conducting GAP analyses to optimize processes, promoting financial education, diversity, inclusion and improving the transparency and risk management mechanisms, while strengthening the principles of business ethics and corporate governance;
- Developing sectoral strategies based on the industries' specifics, incorporating prudential criteria and financing conditions, differentiated by activities' sub-sectors, taking into consideration ESG risks;
- Applying the ESG risk analysis within the lending activity, carried out by specialized teams (ESG risk analysts), while using dedicated applications (Heat-Map); integrating IFC/EBRD standards into ESG analysis;
- Monitoring ESG risks through a system of indicators, and recurring reporting to the management structures, with escalation principles defined by specific governance;
- Continuously modernizing the capabilities and functionalities for the collection and efficient use of the ESG data (e.g. the maintenance and permanent development of the Heat-Map application, the development of a collateral management framework, to include capabilities for a better assessment of the collaterals subject to physical climate risks, modernization of the integrity alert systems, etc.);
- Monitoring the carbon emissions, , both from the own operations and financed activities;
- Continuing the digitalization projects (IT infrastructure, chatbot solutions, collaboration platforms), reducing resource consumption and increasing the use of renewable energy in our own operations.

Notes to the consolidated and separate financial statements

5. Accounting estimates and significant judgements

The Group and the Bank make estimates and assumptions that affect the amounts of assets and liabilities reported within the next financial year. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are considered to be reasonable under the given circumstances.

a) Impairment losses on loans and advances to customers

The Group and the Bank are frequently reviewing (mostly monthly) the loan and finance lease receivables portfolio to assess the impairment. In determining whether an impairment loss should be registered, the Group and the Bank make judgments as to whether there is any observable data indicating that there is a measurable decrease in the estimated future cash flows related to a portfolio of loans and finance lease, before such decrease can be identified with respect to an individual asset in that portfolio.

For example, the observable data might be the unfavorable changes in the payment behavior of certain debtors within a group or in the economic, national or local circumstances, which correlate with default incidents affecting the debtors' group.

When scheduling future cash flows, the management uses estimates based on the past experience related to losses from loans with similar risk characteristics. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any gaps between estimated losses and actual losses, but also to assess the effects of the local financial market uncertainties on the valuation of assets and the debtors' operating environment. Individually significant assets are assessed and monitored individually, regardless of the stage allocation. Thus, a specialized team of experts uses professional judgement to assess the unlikelihood to pay and determine the scenarios used to compute the ECL.

The three-stage expected credit loss impairment model in IFRS 9 depends on whether the credit risk has increased significantly since initial recognition. If the credit risk has not increased significantly, the impairment charge equals the expected credit losses resulting from default events that are possible within the next 12 months (stage 1). If the credit risk has increased significantly, the loan is more than 30 days past due, or the loan is in default or otherwise impaired, the impairment charge equals the lifetime expected credit losses (stage 2 and 3).

In determining the impairment for expected credit losses, management incorporates forward-looking information, exercises judgement and uses estimates and assumptions. The estimation of expected credit losses involves forecasting future economic conditions over 3 years.

The incorporation of forward-looking elements reflects the expectations of the Group and the Bank and involves the creation of scenarios, including an assessment of the probability for each scenario. The Group and the Bank have compiled historical analyses and identified key economic variables impacting credit risk and expected credit losses for each portfolio considering also the professional judgment of the experts. More details on the assumptions, scenarios used and weights allocated to each scenario can be found in Note 4b Credit risk.

In December 2025, the Bank updated the parameters used in measuring the level of expected credit losses and revised the post-model adjustments (PMA) so as to reflect as accurately as possible the current conditions, including by incorporating emerging risks.

With regard to post-model adjustments (PMA), the Bank implemented a methodology based on the level of sensitivity to the identified risks, classifying corporate portfolios according to the primary industry in which clients operate, as determined during the exposure approval process. As for retail clients, PMA adjustments are applied predominantly to unsecured loans considered immediately sensitive to the transmission of macroeconomic and emerging risks, such as geopolitical, climate-related and fiscal risks. In addition, the Bank automatically classifies certain portfolios falling within high risk (rating) classes into Stage 2.

Notes to the consolidated and separate financial statements

5. Accounting estimates and significant judgements (*continued*)

a) Impairment losses on loans and advances to customers (*continued*)

The share of post-model adjustments in total expected credit loss adjustments amounts to 13.51%, compared to 21.78% as of 31 December 2024, this evolution being driven by:

- expectation related to high-risk products and portfolios (additional ECL representing 0.24% of total ECL)*;
- expectations for default rates increase considering emerging risks (additional ECL representing 13.27% of total ECL)**;

* for the category of high-risk products was considered that certain lending products (such as those in the area of unsecured loans granted to clients assessed with a pre-default rating) should be classified as having a significant increase in risk, considering that the impact of the risk events stated including in Note 4 will overwhelmingly affect this area. Those mentioned measures determined the classification in stage 2 of the facilities granted to borrowers who find themselves in the exposed situation and have a qualitatively lower rating, and as a direct effect, the determination of additional adjustments.

** the post-model adjustment has an impact in the forward-looking estimation area.

We consider the main determining factor for the introduction of this adjustment to be the economic environment faced with a series of uncertainties, our opinion being that certain macroeconomic shocks can still have an impact on default rates, even if in the past this has not been concretely highlighted, moreover, they led to an insignificant increase or decrease in default rate forecasts.

In the context of negative evolution of inflation and interest rates, as well as the macroeconomic and political context, financial markets have been moderately volatile, generating short-term challenges in cash-flow management and also variations in mark to market.

The Group and the Bank stand on a comfortable position of liquidity, therefore the market disruptions didn't seriously affect them.

The financial instruments measured at fair value of the Group and the Bank consist of bonds, equities, collective investment units and derivatives, whose valuation was affected by market volatilities, reserves registering a slightly downward trend and remaining in the negative zone. The most significant part of the trading book is represented by bonds, of which the majority are kept at fair value through other comprehensive income, thus allowing that market-to-market impact to be observable in other comprehensive income and not in Consolidated and Separate Statement of Profit or Loss. Note 4 provides more details on the fair value measurement of financial instruments. At the same time, the Group and the Bank hold, outside the trading portfolio (banking book), financial instruments (securities) held mainly for liquidity purposes and as a source of collateral for Lombard and stand-by facilities, as well as to ensure a secure source of income.

b) Tax disputes

General overview of the litigation

The Bank has been involved in a complex tax dispute with the National Agency for Fiscal Administration ("ANAF") concerning the tax treatment of the gain arising from the acquisition of Volksbank S.A. Starting in 2017, the Bank challenged the advance tax ruling ("SFIA") issued by the tax authorities, which treated the acquisition gain as taxable income, although, in the Bank's view, the legal nature of the merger transaction and the provisions of European legislation regarding tax neutrality should have resulted in the non-taxation of this gain. In support of its position, the Bank presented fiscal, accounting and EU-law arguments, and the lower courts repeatedly admitted the Bank's action.

Notes to the consolidated and separate financial statements

5. Accounting estimates and significant judgements (*continued*)

b) Tax disputes (continued)

Loss of the litigation before the High Court in November 2025

In November 2025, the High Court of Cassation and Justice admitted the appeals filed by ANAF and the Ministry of Finance, overturned the judgment of the Cluj Court of Appeal, and rejected the Bank's claim as unfounded. The decision is final. This ruling marks the conclusion of an eight-year litigation process, during which the Bank exhausted all available legal remedies and procedural avenues. Consequently, the dispute concerning the tax treatment of the gain arising from the acquisition of Volksbank S.A. is considered closed, with no further possibility of obtaining a favorable outcome.

Financial impact and accounting treatment

In accordance with the applicable accounting policies (IFRIC 23), the Bank reflected in prior financial reporting periods the additional tax obligations imposed by the authorities using the most probable amount method. Consequently, the principal amount of RON 264 million had already been expensed in previous years, consistent with the prudent position adopted in the consolidated and separate financial statements. With respect to the ancillary tax liabilities, amounting to RON 154,972,067, these are no longer owed by the Bank.

c) Risk provisions for abusive clauses

The provision for abusive clauses is an estimated amount for potential litigations facing the Bank derived from the retail credit contracts inherited from Volksbank Romania S.A., Bancpost S.A. and OTP Bank Romania merger. The provision is periodically reviewed by the Bank by incorporating historical data regarding new litigations in the last years and the loss probability for such cases. The last review for abusive clauses provision has been performed as of December 31, 2025 when the Bank adjusted the provision based on the trend of such new litigations and the probability loss estimated at this date.

d) Other significant litigation

The Bank's subsidiary, B.C. Victoriabank S.A., was notified on July 6, 2020 that it is being investigated in a case instrumented by the Prosecutor's Office of the Republic of Moldova, and on August 6, 2020, a precautionary seizure was placed on some of the subsidiary's balance sheet assets elements, in order to cover the claims in the file - amounting to approximately RON 468 million in equivalent. Given the nature of the case and the legal limitations related to the investigation, the Bank and its subsidiary possess limited information about this case, by also considering the lawyers' analysis of the content of the indictment related to these investigations. Given the stage of the investigation, that relates to a period before the Bank was a shareholder of the subsidiary, the Group and the Bank did not recognize a provision for this case, but will monitor the evolution of the topic at each reporting date, in accordance with the relevant provisions of the accounting regulations. For other significant litigation and regulatory enforcement matters, the Group believes the possibility of an outflow of funds is more than remote and less than probable but the amount can not be reliably estimated, and accordingly such matters are not included in the contingent liability estimates.

Notes to the consolidated and separate financial statements

6. Segment reporting

The Group segment reporting is compliant with the management requirements use. The reporting segments are presented in a manner which is consistent with the internal reporting documentation submitted to the Leaders' Committee. The Leaders' Committee, with the assistance of the Board of Directors, is responsible for the allocation of resources and the assessment of the reporting segments' performance, being considered as an operational decision making factor.

The reporting format is based on the internal management reporting format. All items of assets and liabilities, incomes and expenses are allocated to the reporting segments either directly or based on reasonable criteria established by the management.

The clients of B.C. Victoriabank S.A. and Salt Bank S.A., are classified according to the Bank's standards. The segment "Leasing and loans to non-banking financial institutions" includes the leasing and consumer finance companies, as described in Note 1. The remaining non-banking subsidiaries are included in the segment "Other-Group". The "Intra-group eliminations & adjustments" segment comprises intra-group operations.

The reporting segments are organized and managed separately, depending on the nature of products and services provided, each segment being specialized on certain products and operating on different markets.

A business segment is a component of the Group:

- That engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses related to transactions with other components of the same entity);
- The operating results of which are reviewed regularly by the entity's decision maker in order to make decisions about resources to be allocated to the segment and to assess its performance;
- For which distinct financial information is available.

The reporting segments of the Group as described below:

Large Corporate Clients („LaCo”): The Group include in this category mainly companies/group of companies with an annual turnover exceeding RON 200 million, as well as legal entities created to serve a particular function (SPV), public entities and financial institutions included in this category based on specific classification criteria.

The companies in this category usually have specific and sophisticated needs. Through its centralized and customized approach, the Bank seeks to ensure high operational efficiency, a prompt assessment of the specific needs of this type of clients in order to offer the appropriate customized solutions, but also an in-depth perspective of the risk profile in order to maintain a high quality loan portfolio. The Large Corporate clients have access to an all-inclusive package of banking products and services. The incomes generated by this segment resulting from lending operations, current business operations (transaction banking, Treasury, trade finance and retail products) and other related services (leasing, asset management, consultancy on mergers and acquisitions, capital market advisory services). Through the services provided, the Bank aims at extending its cooperation to the business partners of the LaCo segment - clients/suppliers/employees - by focusing on the increase of non-risk income.

Medium Corporate Customers („Corporate”): The Group include in this category mainly the companies with an annual turnover between 20 and 200 million RON. By setting such value thresholds in the classification of Corporate clients, the Bank is able to address the most frequent requests coming from this category of clients: tailored financing solutions, access to a wide range of banking services, pricing based on financial performance, dedicated and flexible relationship management, operational agility. Depending on the activity type, the customized approach related to customers is supported by two existent specializations, notably Agribusiness and Healthcare.

Notes to the consolidated and separate financial statements

6. Segment reporting (continued)

Medium Corporate Customers („Corporate”) (continued): The Corporate segment includes also entities operating in the public sector, financial institutions or legal entities serving particular functions, included in this category based on specific classification criteria. The Bank offers a full array of financial services to its Mid Corporate clients, including lending facilities, current operations, treasury services, but also additional services such as bonus packages for employees, structured finance, co-financing of EU funded projects; the Bank also facilitates the access to the services provided by the Group subsidiaries, such as bancassurance, consultancy on mergers and acquisitions, asset management, financial and operating lease, with the purpose to increase its profitability and non-risk income.

SME clients - companies with an annual turnover between 3 and 20 million RON. These are companies that have undergone the incipient growth stages and whose business activity requires further attention. Consequently, the needs of such companies become more specific, with priority for financing.

Micro Business clients – company customers with an annual turnover up to 3 million RON.

This category comprises the largest number of companies and the most diverse types of entities, such as limited liability companies, freelancers, sole proprietorships, etc.

The business lifespan (many such clients are fresh companies), the entrepreneur's expertise and the market on which the company operates generate certain needs that the Group and the Bank attempt to serve through product and service packages dedicated to this category of customers, which have become a hallmark in the banking sector over the years. Lending products are accessed more frequently as the Micro or SME business takes shape: loans for working capital or investments, letters of guarantee, EU project co-financing, credit cards, leasing, invoice discounting or factoring.

Another important category of products refers to general operations, incoming and outgoing payments, cheques, promissory notes, FX operations, salary payment agreements or bancassurance services. Increased attention is given to the digitalization of our products and services, our clients showing more and more interest in internet & mobile banking, e-commerce, last generation POSs and the integration of financial data in the proprietary accounting systems.

Retail customers: The Group and the Bank provide a wide range of banking products and services to individuals, differentiated by several customer segments, from children, students, employees from the public or private sector, seniors, as well as the Premium and Private Banking segments. The Group's and the Bank's offer includes transactional banking products, current account subscriptions, bancassurance products, a diversified offer of debit and credit cards, deposits and savings accounts, consumer loans and mortgages, as well as access to the largest network of ATMs and partner merchants through the "STAR" loyalty program.

Also, the Group and the Bank, together with their partners, offer private clients access to a wide range of investments (investment funds, government securities and bonds), pensions, car leasing.

The retail products of the Group and the Bank are accessible to customers through a mix of distribution channels, through the Bank's network of agencies, through digital channels and especially through the BT Pay application. The Bank's retail strategy aims at the continuous development of digital flows that involve a simpler interaction, the origination of new products and services, speed and efficiency, as well as the communication and servicing of customers from a distance, through solutions that allow them direct and immediate access to information. The Group and the Bank support financial inclusion and will continue their efforts to ensure all segments of the population have access to banking products and services in general.

Treasury: The Group and the Bank comprise in this category the treasury services.

Notes to the consolidated and separate financial statements

6. Segment reporting (continued)

Leasing and consumer finance granted by non-banking financial institutions: the Group includes in this category financial products and services such as lease facilities, consumer loans and microfinance provided by the non-banking financial institutions of the Group.

Other: The Group and the Bank incorporate in this category the services offered by other financial entities within the Group: asset management, brokerage, factoring and real estate, as well as elements that do not fall into the existing categories and result from financial and strategic decisions taken centrally.

In terms of geographical distribution, the Group and the Bank cover mainly the Romanian territory, except for the Italy branch operations linked to the Bank while at the Group level there is the banking activity of B.C. Victoriabank S.A. and the financial lease activity of BT Leasing Moldova S.R.L.; however, the impact of these entities on the balance sheet and income statement is not material at Group level. There is no further information regarding the geographical distribution used by the management of the Group and the Bank; therefore it is not presented here.

As at December 31, 2025 and December 31, 2024, the Bank or the Group did not record income exceeding 10% of total incomes in relation to a single customer.

Notes to the consolidated and separate financial statements

6. Segment reporting (continued)

The table below presents financial information per segments regarding the consolidated statement of financial position and the operating profit before net expenses with the impairment allowance for loans and advances to customers, for the financial year ended as at December 31, 2025, and comparative data for 2024:

Reporting segments as at December 31, 2025

Group	Large Corporate	Mid Corporate	SME	Micro	Retail	Treasury	Leasing and consumer loans granted by non-banking financial institutions	Other - Group	Intra-group eliminations & adjustments	Total
<i>In RON thousand</i>										
Gross loans and finance lease receivables	35,960,353	14,433,710	7,257,290	6,763,537	44,858,886	-	11,488,665	8,107	(7,426,300)	113,344,248
Provisions for principal	(1,400,013)	(1,284,168)	(748,045)	(738,457)	(1,923,409)	-	(717,708)	(519)	177,977	(6,634,342)
Loans and finance lease receivables net of provisions	34,560,340	13,149,542	6,509,245	6,025,080	42,935,477	-	10,770,957	7,588	(7,248,323)	106,709,906
Portfolio of Debt instruments, Equity instruments and Derivative instruments, net of provisions	-	-	-	-	-	68,888,403	220	862,468	(543,242)	69,207,849
Treasury and inter-bank operations	-	-	-	-	-	40,937,473	600,764	1,659,230	(1,145,898)	42,051,569
Property and equipment and investment property, Intangible assets and goodwill	69,515	234,251	213,420	489,761	1,403,076	162,814	224,517	330,751	8,610	3,136,715
Right-of-use assets	16,836	53,219	44,185	118,492	310,132	28,838	60,902	5,991	(49,392)	589,203
Other assets	1,058,190	628,426	332,218	262,498	1,883,758	39,527	186,226	607,596	(2,279,984)	2,718,455
Total assets	35,704,881	14,065,438	7,099,068	6,895,831	46,532,443	110,057,055	11,843,586	3,473,624	(11,258,229)	224,413,697
Deposits and current accounts	11,570,680	13,568,152	10,235,495	25,033,670	115,939,342	340,004	-	9,781	(1,145,467)	175,551,657
Loans from banks and other financial institutions	101,019	305,845	36,790	10,162	156	2,222,260	9,336,753	12,514,235	(7,404,419)	17,122,801
Subordinated liabilities	-	-	-	-	-	2,641,443	-	-	1,834	2,643,277
Lease liabilities	163,216	83,031	44,997	40,102	270,552	4,603	60,816	6,156	(49,107)	624,366
Other liabilities	981,433	568,906	283,500	229,883	1,599,317	27,815	237,387	1,221,512	24,052	5,173,805
Total liabilities	12,816,348	14,525,934	10,600,782	25,313,817	117,809,367	5,236,125	9,634,956	13,751,684	(8,573,107)	201,115,906
Equity and related items	-	-	-	-	-	-	-	23,297,791	-	23,297,791
Total liabilities and equity	12,816,348	14,525,934	10,600,782	25,313,817	117,809,367	5,236,125	9,634,956	37,049,475	(8,573,107)	224,413,697

Notes to the consolidated and separate financial statements

6. Segment reporting (continued)

Reporting segments as at December 31, 2024

Group							Leasing and consumer loans granted by non- banking financial institutions	Other - Group	Intra-group eliminations & adjustments	Total
<i>In RON thousand</i>	Large Corporate	Mid Corporate	SME	Micro	Retail	Treasury				
Gross loans and finance lease receivables	31,930,199	14,017,594	6,898,830	6,571,500	40,620,944	-	8,485,389	7,134	(6,555,760)	101,975,830
Provisions for principal Loans and finance lease receivables net of provisions	(1,070,784)	(1,011,428)	(572,835)	(754,145)	(1,790,336)	-	(560,039)	(553)	154,152	(5,605,968)
Portfolio of Debt instruments, Equity instruments and Derivative instruments, net of provisions	30,859,415	13,006,166	6,325,995	5,817,355	38,830,608	-	7,925,350	6,581	(6,401,608)	96,369,862
Treasury and inter-bank operations	-	-	-	-	-	68,206,227	-	575,257	(371,217)	68,410,267
Property and equipment and investment property, Intangible assets and goodwill	-	-	-	-	-	37,081,163	392,681	1,028,015	(2,836,819)	35,665,040
Right-of-use assets	60,549	195,036	205,588	365,356	1,151,185	61,104	187,509	558,683	500	2,785,510
Other assets	19,151	55,549	47,433	118,895	317,228	16,070	40,114	2,892	(30,698)	586,634
Total assets	1,531,485	852,353	422,470	428,740	2,534,551	-	193,388	602,946	(3,347,768)	3,218,165
Deposits and current accounts	32,470,600	14,109,104	7,001,486	6,730,346	42,833,572	105,364,564	8,739,042	2,774,374	(12,987,610)	207,035,478
Loans from banks and other financial institutions	10,569,746	13,784,353	10,745,201	25,161,550	108,488,644	1,992,508	-	7,670	(1,929,251)	168,820,421
Subordinated liabilities	101,380	316,363	98,191	88,028	177	1,116,594	7,117,235	10,854,787	(7,455,039)	12,237,716
Lease liabilities	-	-	-	-	-	2,528,096	-	-	2,439	2,530,535
Other liabilities	152,487	84,614	49,055	44,676	272,708	1,577	39,316	2,927	(29,862)	617,498
Total liabilities	1,181,379	707,754	314,885	298,306	1,856,216	1,564	239,827	900,615	(107,811)	5,392,735
Equity and related items	12,004,992	14,893,084	11,207,332	25,592,560	110,617,745	5,640,339	7,396,378	11,765,999	(9,519,524)	189,598,905
Total liabilities and equity	-	-	-	-	-	-	-	17,436,573	-	17,436,573

Notes to the consolidated and separate financial statements

6. Segment reporting (continued)

Reporting segments as at December 31, 2025

Group	Large Corporate	Mid Corporate	SME	Micro	Retail	Treasury	Leasing and consumer loans granted by non-banking financial institutions	Other - Group	Intra-group eliminations & adjustments	Total
<i>In RON thousand</i>										
Net interest income	1,009,217	694,550	527,666	979,045	2,845,675	908,723	903,956	185,038	11,679	8,065,549
Net commission income	111,487	133,130	121,775	511,729	610,173	(13,175)	20,466	145,853	(18,505)	1,622,933
Net trading income	25,356	74,219	87,961	165,510	336,133	311,774	31,881	191,945	2,670	1,227,449
Net gain / (loss) from financial assets measured through other items of comprehensive income	-	-	-	-	-	34,554	-	32,549	-	67,103
Net gain / (loss) from financial assets which are required to be measured through profit or loss	-	-	-	-	-	238,620	-	25,456	(16,114)	247,962
Contribution to the Bank Deposit Guarantee Fund and to the Resolution Fund	(6,304)	(10,572)	(7,693)	(15,287)	(74,183)	(426)	-	-	-	(114,465)
Other operating income	19,449	23,968	25,086	43,910	347,367	39,604	94,411	266,531	(316,310)	544,016
Total income	1,159,205	915,295	754,795	1,684,907	4,065,165	1,519,674	1,050,714	847,372	(336,580)	11,660,547
Personnel expenses	(109,997)	(294,463)	(236,924)	(456,653)	(1,255,689)	(85,961)	(185,038)	(77,947)	68	(2,702,604)
Other operating expenses	(116,286)	(177,587)	(150,867)	(311,833)	(1,068,263)	(244,958)	(111,492)	(44,533)	46,139	(2,179,680)
Depreciation and amortization	(14,181)	(49,042)	(46,031)	(97,727)	(290,179)	(32,556)	(35,236)	(8,300)	14,876	(558,376)
Total Expenses	(240,464)	(521,092)	(433,822)	(866,213)	(2,614,131)	(363,475)	(331,766)	(130,780)	61,083	(5,440,660)
Operating result before net expenses with provisions for assets, other risks and commitments	918,741	394,203	320,973	818,694	1,451,034	1,156,199	718,948	716,592	(275,497)	6,219,887
Net expenses with provisions for assets, other risks and commitments	(246,186)	(267,224)	(216,644)	21,437	(86,794)	79,449	(156,088)	22,062	18,330	(831,658)
Bargain gain	-	-	-	-	-	-	-	-	121,393	121,393
Profit before income tax	672,555	126,979	104,329	840,131	1,364,240	1,235,648	562,860	738,654	(135,774)	5,509,622

Notes to the consolidated and separate financial statements

6. Segment reporting (continued)

Reporting segments as at December 31, 2024

Group	Large Corporate	Mid Corporate	SME	Micro	Retail	Treasury	Leasing and consumer loans granted by non-banking financial institutions	Other - Group	Intra-group eliminations & adjustments	Total
<i>In RON thousand</i>										
Net interest income	708,722	571,395	432,947	730,950	2,107,544	852,784	655,922	843,602	3,896	6,907,762
Net commission income	102,781	127,768	103,340	464,526	576,814	(12,302)	25,764	110,739	(11,599)	1,487,831
Net trading income	18,617	72,353	80,748	140,017	275,366	273,245	19,420	61,696	(3,171)	938,291
Net gain / (loss) from financial assets measured through other items of comprehensive income	-	-	-	-	-	85,508	-	81,767	(2)	167,273
Net gain / (loss) from financial assets which are required to be measured through profit or loss	-	-	-	-	-	126,150	-	40,866	(8,352)	158,664
Contribution to the Bank Deposit Guarantee Fund and to the Resolution Fund	(5,047)	(11,667)	(6,574)	(10,965)	(55,504)	(886)	-	-	-	(90,643)
Other operating income	8,965	13,341	16,971	39,277	266,335	48,435	91,196	217,719	(210,018)	492,221
Total income	834,038	773,190	627,432	1,363,805	3,170,555	1,372,934	792,302	1,356,389	(229,246)	10,061,399
Personnel expenses	(105,447)	(277,700)	(236,285)	(435,248)	(1,208,559)	(52,564)	(168,548)	(115,275)	32	(2,599,594)
Other operating expenses	(88,152)	(150,897)	(142,679)	(266,592)	(883,754)	(108,682)	(91,562)	(58,917)	48,138	(1,743,097)
Depreciation and amortization	(15,011)	(49,752)	(51,054)	(99,938)	(278,853)	(14,886)	(23,342)	(11,860)	27,996	(516,700)
Total Expenses	(208,610)	(478,349)	(430,018)	(801,778)	(2,371,166)	(176,132)	(283,452)	(186,052)	76,166	(4,859,391)
Operating result before net expenses with provisions for assets, other risks and commitments	625,428	294,841	197,414	562,027	799,389	1,196,802	508,850	1,170,337	(153,080)	5,202,008
Net expenses with provisions for assets, other risks and commitments	(155,937)	(26,757)	(146,275)	8,581	(156,026)	(67,032)	(121,702)	60,369	29,475	(575,304)
Bargain gain	-	-	-	-	-	-	-	-	815,665	815,665
Profit before income tax	469,491	268,084	51,139	570,608	643,363	1,129,770	387,148	1,230,706	692,060	5,442,369

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities

a) Accounting classifications and fair value

Group, as at December 31, 2025			Total		Retail in RON		in FCY		Total		Non-Retail in RON		in FCY	
	Total carrying amount 2025	Total fair value 2025	carrying amount retail customers	Total fair value retail customers	Carrying amount	Fair value	Carrying amount	Fair value	carrying amount companies	Total fair value companies	Carrying amount	Fair value	Carrying amount	Fair value
<i>In RON thousand</i>														
Financial assets														
Financial assets held for trading and measured at fair value through profit or loss (*)	737,679	737,679	-	-	-	-	-	-	737,679	737,679	698,494	698,494	39,185	39,185
Financial assets which are required to be measured at fair value through profit or loss, of which:	1,904,620	1,904,620	-	-	-	-	-	-	1,904,620	1,904,620	648,401	648,401	1,256,219	1,256,219
- Equity instruments	408,636	408,636	-	-	-	-	-	-	408,636	408,636	-	-	408,636	408,636
- Debt instruments	1,495,984	1,495,984	-	-	-	-	-	-	1,495,984	1,495,984	648,401	648,401	847,583	847,583
Financial assets carried at amortized cost	182,721,093	184,170,391	45,052,267	45,976,709	40,071,076	40,949,629	4,981,191	5,027,080	137,668,826	138,193,682	69,426,226	69,349,023	68,242,600	68,844,659
Financial assets measured at fair value through other items of comprehensive income	34,625,744	34,625,744	-	-	-	-	-	-	34,625,744	34,625,744	22,445,002	22,445,002	12,180,742	12,180,742
- Equity instruments	263,505	263,505	-	-	-	-	-	-	263,505	263,505	232,087	232,087	31,418	31,418
- Debt instruments	34,362,239	34,362,239	-	-	-	-	-	-	34,362,239	34,362,239	22,212,915	22,212,915	12,149,324	12,149,324
- Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total financial assets	219,989,136	221,438,434	45,052,267	45,976,709	40,071,076	40,949,629	4,981,191	5,027,080	174,936,869	175,461,725	93,218,123	93,140,920	81,718,746	82,320,805
Financial liabilities														
Financial liabilities held-for-trading	261,867	261,867	-	-	-	-	-	-	261,867	261,867	162,399	162,399	99,468	99,468
Financial liabilities measured at amortized cost	199,388,805	199,534,567	117,362,251	117,345,224	68,291,295	68,270,282	49,070,956	49,074,942	82,026,554	82,189,343	48,612,244	48,614,474	33,414,310	33,574,869
Total financial liabilities	199,650,672	199,796,434	117,362,251	117,345,224	68,291,295	68,270,282	49,070,956	49,074,942	82,288,421	82,451,210	48,774,643	48,776,873	33,513,778	33,674,337

(*) This category comprises only held-for-trading financial assets, including derivative instruments.

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Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

a) Accounting classifications and fair value (continued)

Group, as at December 31, 2024			Total		Retail		in FCY		Total		Non-Retail		in FCY	
	Total carrying amount 2024	Total fair value 2024	carrying amount retail customers	Total fair value retail customers	Carrying amount	Fair value	Carrying amount	Fair value	carrying amount companies	Total fair value companies	Carrying amount	Fair value	Carrying amount	Fair value
<i>In RON thousand</i>														
Financial assets														
Financial assets held for trading and measured at fair value through profit or loss (*)	562,847	562,847	-	-	-	-	-	-	562,847	562,847	529,777	529,777	33,070	33,070
Financial assets which are required to be measured at fair value through profit or loss, of which:	1,469,014	1,469,014	-	-	-	-	-	-	1,469,014	1,469,014	413,883	413,883	1,055,131	1,055,131
- Equity instruments	406,759	406,759	-	-	-	-	-	-	406,759	406,759	466	466	406,293	406,293
- Debt instruments	1,062,255	1,062,255	-	-	-	-	-	-	1,062,255	1,062,255	413,417	413,417	648,838	648,838
Financial assets carried at amortized cost	156,763,340	157,290,664	40,152,808	40,480,148	35,951,170	36,169,538	4,201,638	4,310,610	116,610,532	116,810,516	58,629,645	58,495,803	57,980,887	58,314,713
Financial assets measured at fair value through other items of comprehensive income	43,977,335	43,977,335	-	-	-	-	-	-	43,977,335	43,977,335	29,263,111	29,263,111	14,714,224	14,714,224
- Equity instruments	171,366	171,366	-	-	-	-	-	-	171,366	171,366	148,256	148,256	23,110	23,110
- Debt instruments	43,780,045	43,780,045	-	-	-	-	-	-	43,780,045	43,780,045	29,114,855	29,114,855	14,665,190	14,665,190
- Loans and advances	25,924	25,924	-	-	-	-	-	-	25,924	25,924	-	-	25,924	25,924
Total financial assets	202,772,536	203,299,860	40,152,808	40,480,148	35,951,170	36,169,538	4,201,638	4,310,610	162,619,728	162,819,712	88,836,416	88,702,574	73,783,312	74,117,138
Financial liabilities														
Financial liabilities held-for-trading	235,322	235,322	-	-	-	-	-	-	235,322	235,322	171,178	171,178	64,144	64,144
Financial liabilities measured at amortized cost	187,973,880	187,997,821	109,500,532	109,521,298	65,691,175	65,711,029	43,809,357	43,810,269	78,473,348	78,476,523	48,063,144	48,065,067	30,410,204	30,411,456
Total financial liabilities	188,209,202	188,233,143	109,500,532	109,521,298	65,691,175	65,711,029	43,809,357	43,810,269	78,708,670	78,711,845	48,234,322	48,236,245	30,474,348	30,475,600

(*) This category comprises only held-for-trading financial assets, including derivative instruments.

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Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

a) Accounting classifications and fair value (continued)

Bank, as at December
31, 2025

	Total		Total		Retail		in FCY		Total		Non-Retail		in FCY	
	carrying amount 2025	Total fair value 2025	carrying amount retail customers	Total fair value retail customers	Carrying amount	Fair value	Carrying amount	Fair value	carrying amount companies	Total fair value companies	Carrying amount	Fair value	Carrying amount	Fair value
<i>In RON thousand</i>														
Financial assets														
Financial assets held for trading and measured at fair value through profit or loss (*)	172,972	172,972	-	-	-	-	-	-	172,972	172,972	151,165	151,165	21,807	21,807
Financial assets which are required to be measured at fair value through profit or loss, of which:	2,645,584	2,645,584	-	-	-	-	-	-	2,645,584	2,645,584	1,117,302	1,117,302	1,528,282	1,528,282
- Equity instruments	408,636	408,636	-	-	-	-	-	-	408,636	408,636	-	-	408,636	408,636
- Debt instruments	2,236,948	2,236,948	-	-	-	-	-	-	2,236,948	2,236,948	1,117,302	1,117,302	1,119,646	1,119,646
Financial assets carried at amortized cost	169,089,053	170,416,152	41,115,483	42,124,846	38,427,196	39,364,156	2,688,287	2,760,690	127,973,570	128,291,306	68,844,067	68,760,202	59,129,503	59,531,104
Financial assets measured at fair value through other items of comprehensive income	33,850,743	33,850,743	-	-	-	-	-	-	33,850,743	33,850,743	21,796,626	21,796,626	12,054,117	12,054,117
- Equity instruments	25,948	25,948	-	-	-	-	-	-	25,948	25,948	19,836	19,836	6,112	6,112
- Debt instruments	33,824,795	33,824,795	-	-	-	-	-	-	33,824,795	33,824,795	21,776,790	21,776,790	12,048,005	12,048,005
- Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total financial assets	205,758,352	207,085,451	41,115,483	42,124,846	38,427,196	39,364,156	2,688,287	2,760,690	164,642,869	164,960,605	91,909,160	91,825,295	72,733,709	73,135,310
Financial liabilities														
Financial liabilities held-for-trading	263,550	263,550	-	-	-	-	-	-	263,550	263,550	164,093	164,093	99,457	99,457
Financial liabilities measured at amortized cost	188,933,361	189,084,434	111,303,218	111,285,510	66,618,781	66,597,768	44,684,437	44,687,742	77,630,143	77,798,924	49,090,174	49,092,404	28,539,969	28,706,520
Total financial liabilities	189,196,911	189,347,984	111,303,218	111,285,510	66,618,781	66,597,768	44,684,437	44,687,742	77,893,693	78,062,474	49,254,267	49,256,497	28,639,426	28,805,977

(*) This category comprises only held-for-trading financial assets, including derivative instruments.

Banca Transilvania S.A.

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

a) Accounting classifications and fair value (continued)

Bank, as at December 31, 2024			Total carrying amount		Retail in RON		in FCY		Total carrying amount		Non-Retail in RON		in FCY	
	Total carrying amount 2024	Total fair value 2024	retail customers	value retail customers	Carrying amount	Fair value	Carrying amount	Fair value	companies	Total fair value companies	Carrying amount	Fair value	Carrying amount	Fair value
<i>In RON thousand</i>														
Financial assets														
Financial assets held for trading and measured at fair value through profit or loss (*)	173,405	173,405	-	-	-	-	-	-	173,405	173,405	147,717	147,717	25,688	25,688
Financial assets which are required to be measured at fair value through profit or loss, of which:	2,015,434	2,015,434	-	-	-	-	-	-	2,015,434	2,015,434	818,058	818,058	1,197,376	1,197,376
- Equity instruments	373,337	373,337	-	-	-	-	-	-	373,337	373,337	-	-	373,337	373,337
- Debt instruments	1,642,097	1,642,097	-	-	-	-	-	-	1,642,097	1,642,097	818,058	818,058	824,039	824,039
Financial assets carried at amortized cost	133,300,247	133,704,999	32,282,012	32,674,851	29,815,797	30,077,405	2,466,215	2,597,446	101,018,235	101,030,148	52,869,008	52,757,729	48,149,227	48,272,419
Financial assets measured at fair value through other items of comprehensive income	43,151,498	43,151,498	-	-	-	-	-	-	43,151,498	43,151,498	28,656,833	28,656,833	14,494,665	14,494,665
- Equity instruments	22,780	22,780	-	-	-	-	-	-	22,780	22,780	17,661	17,661	5,119	5,119
- Debt instruments	43,102,794	43,102,794	-	-	-	-	-	-	43,102,794	43,102,794	28,639,172	28,639,172	14,463,622	14,463,622
- Loans and advances	25,924	25,924	-	-	-	-	-	-	25,924	25,924	-	-	25,924	25,924
Total financial assets	178,640,584	179,045,336	32,282,012	32,674,851	29,815,797	30,077,405	2,466,215	2,597,446	146,358,572	146,370,485	82,491,616	82,380,337	63,866,956	63,990,148
Financial liabilities														
Financial liabilities held-for-trading	235,283	235,283	-	-	-	-	-	-	235,283	235,283	172,347	172,347	62,936	62,936
Financial liabilities measured at amortized cost	168,904,408	168,926,031	98,339,638	98,359,358	60,309,650	60,329,504	38,029,988	38,029,854	70,564,770	70,566,673	44,834,963	44,836,885	25,729,807	25,729,788
Total financial liabilities	169,139,691	169,161,314	98,339,638	98,359,358	60,309,650	60,329,504	38,029,988	38,029,854	70,800,053	70,801,956	45,007,310	45,009,232	25,792,743	25,792,724

(*) This category comprises only held-for-trading financial assets, including derivative instruments.

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (*continued*)

b) Fair value of financial assets and liabilities

Fair value is defined as the price that would have been received for the sale of an asset or paid for the transfer of a debt in an orderly transaction between market participants at the valuation date.

The Group and the Bank measure the fair value of the financial instruments using valuation techniques appropriate to the circumstances and classify the valuations in the fair value hierarchy established by IFRS 13 according to the nature and observability of the inputs used.

Hierarchy of fair value

The fair value hierarchy comprises the following levels:

- **Level 1** – quoted (unadjusted) prices for identical assets or liabilities, available in active markets, to which the entity has access at the measurement date; this level reflects the most objective and verifiable measurement of fair value, based solely on directly observable data.
- **Level 2** – observable inputs, directly or indirectly, other than the quoted prices included in level 1, such as prices for similar instruments, interest rates, yield curves, credit spreads or other market data that can be corroborated;
- **Level 3** – unobservable inputs, used when sufficient relevant market data is not available, reflecting assumptions that market participants would use in pricing the asset or debt.

The classification of a financial instrument into a level of the fair value hierarchy is based on the lowest level of significant inputs used in the valuation. Accordingly, if the fair value measurement uses significant unobservable inputs, it is classified as level 3, even if observable data is also used.

The objective of valuation techniques is to determine a fair value that reflects the price that would have been obtained in an orderly transaction between market participants, under normal market conditions, at the date of preparation of the financial statements.

The availability of market-observable data reduces the need to use management estimates and reasoning, and thus the uncertainty associated with determining fair value. The observability of market data depends on the type of financial instrument and the market conditions existing at the reporting date.

i) Hierarchical analysis of the fair value of financial instruments held at fair value

In determining the hierarchical level of fair value, the Group and the Bank apply classification criteria in accordance with IFRS 13, taking into account both direct observations of the prices and transactions of that instrument, as well as observations on comparable instruments, where they are relevant for the derivation of a market price.

Assessment techniques used include, but are not limited to:

- prices and quotes obtained from specialized platforms or from third parties;
- models based on the prices of instruments with similar characteristics;
- models based on relevant interest and yield curves;
- methods for updating future cash flows;
- other generally accepted economic methodologies.

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (*continued*)

b) Fair value of financial assets and liabilities (*continued*)

i) Fair value hierarchy analysis of financial instruments carried at fair value (*continued*)

Level 1

Level 1 includes financial instruments for which fair value is determined on the basis of unadjusted quoted prices in active markets for identical instruments. These mainly include equity instruments and certain debt instruments traded on active markets.

Level 2

Level 2 is classified as financial instruments for which fair value is determined using observable input data other than quoted prices for identical instruments. These mainly include derivatives and certain bonds for which the valuation is based on prices or returns of similar instruments, yield curves and other observable market data. The valuation models used for these tools mainly use observable data and require a limited level of reasoning from management.

Level 3

Tier 3 classifies financial instruments for which the measurement of fair value involves the use of significant unobservable inputs. These include, inter alia, certain equity instruments, tangible assets, investment real estate and some debt instruments.

For these instruments, fair value is determined using valuation techniques that are based on assumptions about future cash flows, adjustments for credit and liquidity risk, as well as other relevant assumptions, which reflect how market participants would value these instruments.

In some cases, management has assessed that the carrying amount of financial assets and liabilities represents a reasonable approximation of fair value. This assessment is based on the fact that the carrying amount already includes material adjustments for credit risk, expected losses and other relevant factors, which are considered to be consistent with the assumptions used by market participants. As a result of the use of significant unobservable inputs, these instruments are classified at level 3 of the fair value hierarchy.

Property, plant and equipment and investments in real estate are classified at level 3 of the fair value hierarchy, as their valuation involves the use of significant unobservable inputs. Fair value is determined on the basis of valuation reports prepared by external, independent and appropriately qualified valuers, using generally accepted valuation techniques.

The main unobservable inputs used in the valuation process include, depending on the nature of the asset, discount rates, capitalization returns, long-term growth assumptions, market rents, vacancy rates and estimates of future cash flows. These inputs reflect management's assessment of the assumptions that market participants would use in determining the fair value of assets at the reporting date.

Transfers between levels of the fair value hierarchy

During the financial year, transfers between levels of the fair value hierarchy took place, driven by changes in the observability of the input data used in the valuation, respectively the emergence or disappearance of observable market quotations and changes in the liquidity of those instruments. These transfers did not have a material impact on the consolidated and individual financial statements.

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

b) Fair value of financial assets and liabilities (continued)

i) Fair value hierarchy analysis of financial instruments carried at fair value (continued)

The table below presents the financial instruments and investment properties measured at fair value in the statement of financial position, at the end of the reporting period, by fair value levels:

		Level 1 - Quoted market prices in active markets	Level 2 - Valuation techniques – observable inputs	Level 3 - Valuation techniques – unobserva- ble inputs	Total
Group - In RON thousand					
December 31, 2025					
Financial assets held for trading and measured at fair value through profit or loss, of which:	21.a)	383,192	203,320	5,343	591,855
- Equity instruments		383,192	-	-	383,192
- Debt instruments		-	203,320	5,343	208,663
Derivatives	43	-	145,824	-	145,824
Financial assets measured at fair value through other items of comprehensive income	24	34,146,028	105,324	374,392	34,625,744
- Equity instruments		184,087	-	79,418	263,505
- Debt instruments		33,961,941	105,324	294,974	34,362,239
- Loans and advances		-	-	-	-
Financial assets which are required to be measured at fair value through profit or loss, of which:	21.b)	1,118,026	281,328	505,266	1,904,620
- Equity instruments		396,061	-	12,575	408,636
- Debt instruments		721,965	281,328	492,691	1,495,984
Total financial assets measured at fair value in the statement of financial position		35,647,246	735,796	885,001	37,268,043
Non-financial assets at fair value		-	-	1,711,134	1,711,134
- Property and equipment and investment property	26	-	-	1,711,134	1,711,134
Total assets measured at fair value in the statement of financial position		35,647,246	735,796	2,596,135	38,979,177
Financial liabilities held-for-trading	43	-	261,867	-	261,867
December 31, 2024					
Financial assets held for trading and measured at fair value through profit or loss, of which:	21.a)	249,120	135,953	4,744	389,817
- Equity instruments		249,120	-	-	249,120
- Debt instruments		-	135,953	4,744	140,697
Derivatives	43	-	173,030	-	173,030
Financial assets measured at fair value through other items of comprehensive income	24	43,203,627	561,684	212,024	43,977,335
- Equity instruments		97,692	-	73,674	171,366
- Debt instruments		43,105,935	535,760	138,350	43,780,045
- Loans and advances		-	25,924	-	25,924
Financial assets which are required to be measured at fair value through profit or loss, of which:	21.b)	940,385	495,443	33,186	1,469,014
- Equity instruments		373,573	-	33,186	406,759
- Debt instruments		566,812	495,443	-	1,062,255
Total financial assets measured at fair value in the statement of financial position		44,393,132	1,366,110	249,954	46,009,196
Non-financial assets at fair value		-	-	1,655,373	1,655,373
- Property and equipment and investment property	26	-	-	1,655,373	1,655,373
Total assets measured at fair value in the statement of financial position		44,393,132	1,366,110	1,905,327	47,664,569
Financial liabilities held-for-trading	43	-	235,322	-	235,322

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

b) Fair value of financial assets and liabilities (continued)

i) Fair value hierarchy analysis of financial instruments carried at fair value (continued)

Bank - In RON thousand	Notes	Level 1 - Quoted market prices in active markets	Level 2 - Valuation techniques – observable inputs	Level 3 - Valuation techniques – unobservable inputs	Total
December 31, 2025					
Financial assets held for trading and measured at fair value through profit or loss, of which:	21.a)	22,330	-	-	22,330
- Equity instruments		22,330	-	-	22,330
Derivatives	43	-	150,642	-	150,642
Financial assets measured at fair value through other items of comprehensive income	24	33,426,460	103,360	320,923	33,850,743
- Equity instruments		-	-	25,948	25,948
- Debt instruments		33,426,460	103,360	294,975	33,824,795
- Loans and advances		-	-	-	-
Financial assets which are required to be measured at fair value through profit or loss, of which:		930,708	1,209,610	505,266	2,645,584
- Equity instruments	21.b)	396,061	-	12,575	408,636
- Debt instruments		534,647	1,209,610	492,691	2,236,948
Total financial assets measured at fair value in the statement of financial position		34,379,498	1,463,612	826,189	36,669,299
Non-financial assets at fair value		-	-	1,227,878	1,227,878
- Property and equipment and investment property	26	-	-	1,227,878	1,227,878
Total assets measured at fair value in the statement of financial position		34,379,498	1,463,612	2,054,067	37,897,177
Financial liabilities held-for-trading	43	-	263,550	-	263,550
December 31, 2024					
Financial assets held for trading and measured at fair value through profit or loss, of which:	21.a)	17,833	-	-	17,833
- Equity instruments		17,833	-	-	17,833
Derivatives	43	-	155,572	-	155,572
Financial assets measured at fair value through other items of comprehensive income	24	42,431,786	558,581	161,131	43,151,498
- Equity instruments		-	-	22,780	22,780
- Debt instruments		42,431,786	532,657	138,351	43,102,794
- Loans and advances		-	25,924	-	25,924
Financial assets which are required to be measured at fair value through profit or loss, of which:	21.b)	890,035	1,095,180	30,219	2,015,434
- Equity instruments		343,118	-	30,219	373,337
- Debt instruments		546,917	1,095,180	-	1,642,097
Total financial assets measured at fair value in the statement of financial position		43,339,654	1,809,333	191,350	45,340,337
Non-financial assets at fair value		-	-	829,734	829,734
- Property and equipment and investment property	26	-	-	829,734	829,734
Total assets measured at fair value in the statement of financial position		43,339,654	1,809,333	1,021,084	46,170,071
Financial liabilities held-for-trading	43	-	235,283	-	235,283

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (*continued*)

b) Fair value of financial assets and liabilities (*continued*)

ii) Financial instruments not carried at fair value

At level 1 in the fair value hierarchy, the Group and the Bank included in the category of assets that are not held at fair value: financial assets at amortized cost - debt instruments, represented by bonds issued by central administrations, municipal and credit institutions.

At level 2 in the fair value hierarchy, the Group and the Bank included in the category of assets that are not held at fair value: placements with banks and public institutions, financial assets measured at amortized cost - debt instruments and in the category of liabilities: deposits from banks and from customers.

The fair value of customer deposits was determined as the difference between the interest rates related to the current portfolio at the end of the reporting period and the prevailing interest rates offered by the Group and the Bank, at the end of the financial period. For time deposits, a calculation of updated cash flows was performed using the margins related to new deposits, taking into account the characteristics of each deposit, product type, currency, interest rate type, customer segmentation.

The fair value of the current accounts and savings accounts was estimated to be equal to the carrying amount, there being no evidence of product characteristics that would require a value different from that currently in the accounting books.

At level 3 in the fair value hierarchy, the Group and the Bank included in the category of assets: loans and advances and finance lease receivables and other financial assets; and in the category of liabilities: loans from banks and other financial institutions, subordinated loans, lease liabilities and other financial liabilities.

The fair value of non-impaired loans and advances to customers and non-impaired finance lease receivables was determined based on the cash flows estimated to be generated by the portfolio. These amounts have been updated using the interest rates that would currently be offered to customers for similar products (the offer available at the reporting date) taking into account the characteristics of each credit and leasing contract, namely product type, currency, interest rate type, customer segmentation.

For the impaired loan and finance lease receivables portfolio, a similar discounted cash flow calculation resulted in a fair value calculation that can approximate the net book value.

For loans from banks and other financial institutions and subordinated liabilities, fair value is determined by using discounted cash flows based on interest rates offered for similar products and over comparable time horizons. Calculation of the fair value of the loans from banks and other financial institutions and subordinated liabilities, resulted in a fair value result that may be approximately the same as the net book value.

In the case of debt securities measured at amortized cost, the same ranking criteria apply as in the case of securities measured at fair value.

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

b) Fair value of financial assets and liabilities (continued)

ii) Financial instruments not carried at fair value (continued)

The table below presents the fair value and the fair value hierarchy for the financial assets and liabilities that are not measured at fair value in the statement of financial position as at December 31, 2025:

<i>In RON thousand</i>	Notes	Carrying amount	Fair value	Group Fair value hierarchy			Carrying amount	Fair value	Bank Fair value hierarchy		
				Level 1	Level 2	Level 3			Level 1	Level 2	Level 3
Assets											
Placements with banks and public institutions	20	16,552,294	16,552,678	-	16,552,678	-	14,476,281	14,476,665	-	14,476,665	-
Loans and advances to customers	22	100,446,007	101,067,577	-	-	101,067,577	99,691,081	100,503,149	-	-	100,503,149
Finance lease receivables	23	6,263,899	6,538,259	-	-	6,538,259	-	-	-	-	-
Financial assets at amortized cost - debt instruments	24	31,939,806	32,489,513	28,648,465	2,363,373	1,477,675	29,871,314	30,382,684	28,558,887	346,122	1,477,675
Other financial assets	30	2,019,812	2,023,089	-	-	2,023,089	1,826,066	1,829,343	-	-	1,829,343
Total assets		157,221,818	158,671,116	28,648,465	18,916,051	111,106,600	145,864,742	147,191,841	28,558,887	14,822,787	103,810,167
Liabilities											
Deposits from banks	32	301,847	301,847	-	301,847	-	321,053	321,053	-	321,053	-
Deposits from customers	33	175,249,810	175,215,936	-	175,215,936	-	168,861,727	168,845,245	-	168,845,245	-
Loans from banks and other financial institutions	34	17,122,801	17,302,437	11,975,497	2,401,896	2,925,044	14,604,339	14,771,894	11,969,201	2,028,200	774,493
Subordinated liabilities	35	2,643,277	2,643,277	-	-	2,643,277	2,466,250	2,466,250	-	-	2,466,250
Lease liabilities		624,366	624,366	-	-	624,366	595,633	595,633	-	-	595,633
Other financial liabilities	37	3,446,704	3,446,704	-	-	3,446,704	2,084,359	2,084,359	-	-	2,084,359
Total liabilities		199,388,805	199,534,567	11,975,497	177,919,679	9,639,391	188,933,361	189,084,434	11,969,201	171,194,498	5,920,735

Notes to the consolidated and separate financial statements

7. Financial assets and liabilities (continued)

b) Fair value of financial assets and liabilities (continued)

ii) Financial instruments not carried at fair value (continued)

The table below presents the fair value and the fair value hierarchy for the financial assets and liabilities that are not measured at fair value in the statement of financial position as at December 31, 2024:

<i>In RON thousand</i>	Notes	Carrying amount	Fair value	Group			Carrying amount	Fair value	Bank		
				Fair value hierarchy					Fair value hierarchy		
				Level 1	Level 2	Level 3			Level 1	Level 2	Level 3
Assets											
Placements with banks and public institutions	20	13,714,870	13,714,870	-	13,714,870	-	13,612,057	13,612,057	-	13,612,057	-
Loans and advances to customers	22	90,779,626	91,085,263	-	-	91,085,263	81,389,989	81,764,482	-	-	81,764,482
Finance lease receivables	23	5,590,236	5,777,192	-	-	5,777,192	-	-	-	-	-
Financial assets at amortized cost - debt instruments	24	22,401,071	22,433,173	15,327,337	7,006,613	99,223	19,376,763	19,404,393	14,309,171	4,995,999	99,223
Other financial assets	30	2,327,367	2,329,996	-	-	2,329,996	2,013,078	2,015,707	-	-	2,015,707
Total assets		134,813,170	135,340,494	15,327,337	20,721,483	99,291,674	116,391,887	116,796,639	14,309,171	18,608,056	83,879,412
Liabilities											
Deposits from banks	32	951,155	951,155	-	951,155	-	1,173,778	1,173,778	-	1,173,778	-
Deposits from customers	33	167,869,266	167,892,453	-	167,892,453	-	150,785,254	150,806,803	-	150,806,803	-
Loans from banks and other financial institutions	34	12,237,716	12,238,470	10,146,672	201,980	1,889,818	11,209,491	11,209,565	10,144,092	162,603	902,870
Subordinated liabilities	35	2,530,535	2,530,535	-	-	2,530,535	2,405,137	2,405,137	-	-	2,405,137
Lease liabilities		617,498	617,498	-	-	617,498	747,857	747,857	-	-	747,857
Other financial liabilities	37	3,767,710	3,767,710	-	-	3,767,710	2,582,891	2,582,891	-	-	2,582,891
Total liabilities		187,973,880	187,997,821	10,146,672	169,045,588	8,805,561	168,904,408	168,926,031	10,144,092	152,143,184	6,638,755

Notes to the consolidated and separate financial statements

8. Net interest income

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Interest income calculated using the effective interest method	12,152,570	10,692,264	11,104,418	9,610,503
- Cash and current accounts with Central Banks at amortised cost	402,679	470,593	339,605	387,410
- Placements with banks and public institutions at amortised cost	438,293	614,228	398,968	644,208
- Loans and advances to customers at amortised cost	7,995,136	7,030,907	7,244,358	6,133,022
- Debt instruments at fair value through other items of comprehensive income	1,826,140	1,617,767	1,796,865	1,600,624
- Debt instruments at amortised cost	1,490,322	958,769	1,324,622	845,239
Other similar income	615,060	551,024	-	-
- Finance lease receivables	614,976	551,024	-	-
- Non-recourse factoring receivables and other assets	84	-	-	-
Total interest income	12,767,630	11,243,288	11,104,418	9,610,503
Interest expense related to financial liabilities measured at amortized cost	4,686,401	4,323,349	4,457,657	4,063,526
- Cash and current accounts with Central Banks	59	(64)	2	3
- Deposits from banks	10,604	7,349	12,433	5,104
- Deposits from customers	3,511,637	3,376,916	3,365,725	3,179,813
- Loans from banks and other financial institutions	1,164,101	939,148	1,079,497	878,606
Other similar expense	15,680	12,177	15,610	14,782
- Lease liabilities	15,680	12,177	15,610	14,782
Total interest expense	4,702,081	4,335,526	4,473,267	4,078,308
Net interest income	8,065,549	6,907,762	6,631,151	5,532,195

Interest income for the year ended at December 31, 2025 includes the net interest income on impaired financial assets amounting RON 381,630 thousand (2024: RON 429,823 thousand) for the Group and RON 217,931 thousand (2024: RON 227,575 thousand) for the Bank.

The interest income and expense related to the financial assets and liabilities, other than those held at fair value through profit or loss, are determined using the effective interest rate method.

9. Net fee and commission income

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Fee and commission income				
Commissions from treasury and inter-bank operations	401,898	353,955	401,939	353,898
Client transactions (i)	2,242,796	1,999,360	1,947,542	1,678,939
Lending activity (ii)	22,623	20,400	18,638	12,809
Finance lease management	4	6,282	-	-
Asset management (iii)	70,265	48,425	-	-
Other fee and commission income	15,549	7,351	436	716
Total fee and commission income from contracts with customers	2,753,135	2,435,773	2,368,555	2,046,362
Fee income from financial guarantee contracts (iv)	88,302	79,335	84,473	70,231
Total fee and commission income	2,841,437	2,515,108	2,453,028	2,116,593
Fee and commission expense				
Commissions from treasury and inter-bank operations	813,369	690,892	692,610	583,184
Client transactions	335,626	290,193	280,746	203,898
Lending activity (ii)	66,101	43,639	88,053	58,364
Other fees and commissions	3,408	2,553	3,297	2,868
Total fee and commission expense	1,218,504	1,027,277	1,064,706	848,314
Net fee and commission income	1,622,933	1,487,831	1,388,322	1,268,279

(i) Fees related to transactions with clients mainly include cards fees, payments/collections fees, custody fees and other fees related to transactions with clients

(ii) Lending-related fees include valuation fees, factoring fees, debt recovery fees

(iii) This category includes the management commissions of open and alternative investment funds

(iv) Although the fee income from financial guarantee contracts and loan commitments is recognised in accordance with the principle of IFRS15 the financial guarantee contracts is in the scope IFRS 9 and the fee income from it is not revenue from contracts with customers. The Group and the Bank present the fee income from financial guarantees as part of total fee and commission income.

Notes to the consolidated and separate financial statements

10. Net trading income

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Net income from foreign exchange transactions	883,464	796,703	747,427	635,908
Net income/(expense) from derivatives	107,201	53,244	97,824	35,235
Net income/(expense) from financial assets held-for-trading	203,170	57,184	5,705	(1,586)
Net income from foreign exchange position revaluation	33,614	31,160	43,161	37,930
Net trading income	1,227,449	938,291	894,117	707,487

11. Net gain/loss (-) from the sale of financial assets measured at fair value through other items of comprehensive income

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Income from the sale of financial assets measured at fair value through other items of comprehensive income	68,161	168,363	67,484	165,432
Losses from the sale of financial assets measured at fair value through other items of comprehensive income	(1,058)	(1,090)	(1,058)	(1,090)
Net gain/ loss (-) from the sale of financial assets measured at fair value through other items of comprehensive income	67,103	167,273	66,426	164,342

12. Net gain/loss (-) from financial assets which are required to be measured at fair value through profit or loss

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Income from financial assets which are required to be measured at fair value through profit or loss	502,432	269,420	697,615	397,836
Losses from financial assets which are required to be measured at fair value through profit or loss	(254,470)	(110,756)	(263,348)	(115,538)
Net gain/ loss (-) from financial assets which are required to be measured at fair value through profit or loss	247,962	158,664	434,267	282,298

13. Contribution to the Bank Deposit Guarantee Fund and to the Resolution Fund

The impact of the breakdown of the annual contribution to the two funds, as reflected in the consolidated and separate statement of profit or loss, is the following:

	Group		Bank	
	2025	2024	2025	2024
Contribution to the Bank Deposit Guarantee Fund	55,345	48,795	49,565	45,218
Contribution to the Bank Resolution Fund	59,120	41,848	52,888	29,296
Total	114,465	90,643	102,453	74,514

Notes to the consolidated and separate financial statements

14. Other operating income

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Dividend income	18,929	15,665	77,352	23,572
Revenue from movable and immovable assets resulting from debt enforcement	8,094	6,077	1,775	3,251
Income from insurance intermediation	305,309	241,220	204,029	158,680
Income from VISA, MASTERCARD, WU services	87,794	69,966	81,214	62,371
Income from indemnities, fines and penalties	7,413	5,741	5,647	2,866
Income from real estate investments and tangible assets	12,807	7,129	144	382
Rental income	19,393	3,040	-	-
Other operating income (i)	84,277	143,383	103,616	92,655
Total	544,016	492,221	473,777	343,777

(i) The category "Other operating income" includes the following types of income: debt recoveries related to closed accounts, surplus from ATM transactions not claimed by customers, cash at hand differences, income from recovered legal expenses, other recoveries from operating expenses.

15. Net expense from impairment allowance, expected losses on assets, provisions for other risks and loan commitments

(a) Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Net impairment allowance on assets (i)	992,831	907,812	753,139	556,441
Loans written off	763	10,861	-	1
Finance lease receivables and other assets written off	1,211	782	-	-
Provisions for loan commitments, financial guarantees and other commitments given	36,960	24,021	53,922	26,548
Recoveries from loans written off and sales of loans portfolio	(210,977)	(280,844)	(192,046)	(146,884)
Recoveries from finance lease receivables written off	(830)	(5,535)	-	-
Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss	819,958	657,097	615,015	436,106

(i) Net impairment losses on assets include the following:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Loans and advances to customers	1,096,910	701,515	836,134	449,443
Treasury and inter-bank operations	(3,941)	8,004	(3,167)	(3,327)
Finance lease receivables	(37,493)	64,639	-	-
Participating interest	2,005	-	-	-
Investment securities	(68,067)	63,640	(76,813)	55,576
Other financial assets	3,417	70,014	(3,015)	54,749
Net impairment allowance on assets	992,831	907,812	753,139	556,441

Notes to the consolidated and separate financial statements

15. Net expense from impairment allowance, expected losses on assets, provisions for other risks and loan commitments

(b) (Other) Provisions and reversal of provisions

	Group		Bank	
<i>In RON thousand</i>	2025	2024	2025	2024
Other non-financial assets	(1,755)	1,691	(3,387)	(1,435)
Property and equipment and intangible assets	(366)	-	-	-
Litigation and other risks (*)	13,821	(83,484)	10,618	(102,499)
(Other) Provisions and reversal of provisions	11,700	(81,793)	7,231	(103,934)

(*) Release of provisions related to litigations and other risks from loan contracts that were taken over through the mergers with Volksbank Romania S.A. and Bancpost S.A., and OTP Bank Romania.

16. Personnel expenses

	Group		Bank	
<i>In RON thousand</i>	2025	2024	2025	2024
Gross salaries	2,398,831	2,102,168	1,844,205	1,598,514
Social protection contribution	103,795	88,749	60,079	51,038
Share payments to employees	146,707	124,411	141,457	121,152
Pension contribution to Pillar III	17,056	16,113	15,420	14,563
Other staff expenses	162,268	155,875	137,864	127,833
Net expense with provisions for untaken holiday and other benefits	(126,053)	112,278	(36,516)	32,245
Total	2,702,604	2,599,594	2,162,509	1,945,345

The average number of new employees within the Group and the Bank during 2025 and 2024 was:

Category	Monthly average number of persons employed during 2025		Monthly average number of persons employed during 2024	
	Group	Bank	Group	Bank
Management positions	9.25	6.5	32.25	2.83
Operational positions	170.17	105.08	239.25	92.83
Total	179.42	111.58	271.5	95.66

The Bank has established a Stock Option Plan (SOP) program, within which the Bank's staff can exercise their right and option to acquire a number of shares issued by the Bank.

Vesting conditions for 2026 related to SOP 2025:

- Achievement of performance and prudential indicators during 2025;
- Compliance with certain individual eligibility and/or performance criteria, in accordance with the applicable remuneration policy and standard, related to the year for which shares are granted;
- Being an employee upon the granting of the SOP right (May 27, 2025) and when exercising such right (starting from May 28, 2026).

Contractual vesting period for the shares granted for the year 2025 through SOP:

- Release after May 28, 2026;
- Deferral period for the identified personnel subject to applicable restrictions, pursuant to internal regulations in force.

The impact in profit or loss of a possible value change of the shares which are to be granted to the employees under the Stock Option Plan for 2025, by a maximum of +/-15.00% regulated by the Bucharest Stock Exchange, would be of RON +/- 30,078 thousand.

Vesting conditions for 2025 related to SOP 2024:

- Achievement of performance and prudential indicators during 2024;
- Compliance with certain individual eligibility and/or performance criteria, in accordance with the applicable remuneration policy and standard, related to the year for which shares are granted;
- Being an employee upon the granting of the SOP right (May 24, 2024) and when exercising such right (starting from May 26, 2025);

Notes to the consolidated and separate financial statements

16. Personnel expenses (continued)

Contractual vesting period for the shares granted for the year 2024 through SOP:

- Release after May 26, 2025;
- Deferral period for the identified personnel subject to applicable restrictions, pursuant to internal regulations in force.

The movement in transactions related to share-based payments during 2025 and 2024 is presented below:

<i>In RON thousand</i>	2025	2024
Balance as at January 1	104,872	65,916
Rights granted during the year	(187,651)	(82,196)
Expense with employee benefits in the form of share-based payments	141,457	121,152
Closing balance at the end of period	58,678	104,872

In 2025, a number of 7,302,016 shares were granted to employees and members of the Board of Directors and during the year 2024, a number of 3,447,238 shares was granted to the employees and members of the Board of Directors:

Granting date	Number of shares	Contractual vesting period	Vesting conditions
Shares granted to employees for the year 2025	7,044,206	With immediate release on May 28, 2025	Achievement of performance and prudential indicators during 2025. Compliance with the conditions stipulated in the applicable remuneration policy and standard, related to the year for which shares are granted, as well as with the conditions of the trust agreement.
	257,810	Deferral by trust agreement for 3 - 5 years	

17. Other operating expenses

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Rent and lease expenses	17,862	12,307	12,909	7,940
Repairs and maintenance expenses	533,780	439,937	402,012	343,263
Advertising, marketing, entertainment and sponsorship expenses	267,955	250,623	182,973	166,800
Mail, telecommunication and SMS traffic expenses	107,559	91,432	83,567	68,139
Materials and stationery expenses	102,705	128,991	82,458	93,535
Other professional fees, including legal expenses	55,898	65,522	47,136	55,052
Electricity and heating expenses	55,939	44,479	49,617	36,547
Business travel, transportation and temporary relocation expenses	98,575	82,162	91,959	74,455
Insurance expenses	43,604	39,003	31,090	30,955
Taxes and contributions (*)	508,994	312,216	495,771	289,465
Write-off and loss on disposal of tangible assets	20,076	-	15,429	-
Write-off and loss on disposal of intangible assets	22,590	1,598	1,012	33
Security and protection expenses	42,876	36,977	40,693	33,248
Archiving services expenses	20,273	18,834	18,928	16,645
Expenses related to database queries from the Trade Register and the Credit Bureau	11,906	10,032	8,734	7,453
Expenses with foreclosed assets	14,492	11,810	10,102	9,222
Audit, advisory and other services provided by the independent auditor:	13,357	14,198	7,793	7,911
- statutory and group audit fees	9,378	8,832	3,967	3,360
- special audit services or other non-audit services as required by the local rules or legislation	3,979	5,366	3,826	4,551
Other operating expenses	241,239	182,976	145,869	126,222
Total other operating expenses	2,179,680	1,743,097	1,728,052	1,366,885

(*) (*) As of December 31, 2025, the line "Taxes and contributions" also includes the turnover tax for the reported period, calculated by applying the rate of 2% on the turnover achieved in the first 6 months of 2025 and the rate of 4% on the turnover achieved in the last 6 months of 2025, in accordance with the applicable legislation. The turnover tax for 2025 amounts to 491,387 thousand lei for the Group and 487,176 thousand lei for the Bank (compared to 283,759 thousand lei for the Group and 269,484 thousand lei for the Bank as of December 31, 2024).

Notes to the consolidated and separate financial statements

18. Income tax expense

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Gross Profit	5,509,622	5,442,369	4,819,443	4,159,993
Tax at the statutory rate	(881,540)	(870,779)	(771,111)	(665,599)
Fiscal effect of income tax on the following elements:	32,639	158,934	46,958	37,284
- Non-taxable income	85,849	162,633	144,329	121,719
- Non-deductible expense	(250,930)	(133,531)	(284,938)	(212,893)
- Tax deductions	189,476	175,021	178,411	156,224
- Elements similar to income	(117,923)	(20,422)	(116,229)	(1,356)
- Elements similar to expenses	124,248	1,643	123,466	-
- Global minimum top-up tax	(3,000)	-	(3,000)	-
- Current income tax from previous years related to acquisitions	4,919	-	4,919	-
- Income tax related to fiscal uncertainties	-	(26,410)	-	(26,410)
Income tax expense	(848,901)	(711,845)	(724,153)	(628,315)
- Expenses with current tax	(859,799)	(767,815)	(714,722)	(640,966)
- Income / expenses with deferred tax	10,898	55,970	(9,431)	12,651

19. Cash and current accounts with Central Banks

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Minimum reserve requirement	19,633,938	16,501,355	17,672,361	12,193,009
Cash on hand and other values	5,865,337	5,448,815	5,551,950	4,715,351
Total	25,499,275	21,950,170	23,224,311	16,908,360

During 2025, the minimum reserve requirements ratio at the National Bank of Romania was 8% for RON denominated balances and 5% for EUR denominated balances (2024: 8% for funds denominated in RON and 5% for EUR). The minimum reserve balance may fluctuate on a daily basis. The interest paid by the National Bank of Romania for the reserves held by the banks was 0.76%-0.86% per year for the reserves in RON and 0.13%-0.20% per year for reserves denominated in EUR. (2024: 0.74% - 0.83% per year for the reserves in RON and 0.08%-0.19% per year for EUR). The minimum required reserve can be used by the Bank for its daily activities as long as the average monthly balance is maintained within the required limits.

As at December 31, 2025, the reserve requirement norm for funds attracted in MDL and non-convertible currency was set at the level of 20.0%, respectively the reserve requirement norm for funds attracted in freely convertible currency – at the level of 29.0% (as at December 31, 2024: the reserve requirement norm for funds attracted in MDL – 25.0%, attracted in freely convertible currency – 34.0%). The remuneration rate paid by the National Bank of Moldova, during 2025, for reserve requirements from funds attracted in MDL and non-convertible currencies increased from 1.60% to 3.32%. The rate applied to the remuneration of foreign currency reserves decreased from 2.52% to 1.78% for USD and from 1.05% to 0.00% for EUR.

Reconciliation of cash and cash equivalents with the consolidated and separate statement of financial position and with the cash flow statement:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Cash and current accounts with Central Banks (*)	25,490,867	17,425,427	23,222,217	16,906,873
Placements with banks with maturity below 3 months	12,860,352	11,239,353	11,243,165	10,005,003
Reverse-repo transactions	2,748,801	1,000,412	2,748,801	1,000,412
Loans and advances to credit institutions with maturity below 3 months	10,687	-	10,687	-
Financial assets measured at fair value through other items of comprehensive income with maturity below 3 months	10,799	298,328	10,799	298,328
Financial assets at amortized cost – debt instruments with maturity below 3 months	1,336,368	585,123	1,336,368	-
Cash and cash equivalents in the cash flow statement	42,457,874	30,548,643	38,572,037	28,210,616

(*) At Group level, the cash and current accounts with Central Banks do not include the accrual and interest receivable in the amount of RON 3,922 thousand (2024: RON 3,402 thousand) and at the level of the Bank in the amount of RON 2,094 thousand (2024: RON 1,487 thousand).

Notes to the consolidated and separate financial statements

20. Placements with banks and public institutions

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Current accounts with other banks	1,000,623	1,120,402	461,216	801,165
Sight, collateral and term deposits with other banks and public institutions	12,498,555	11,134,045	10,961,949	10,437,501
Reverse repo transactions	2,750,659	1,001,246	2,750,659	1,001,246
Loans and advances to credit institutions	302,457	459,177	302,457	1,372,145
Total	16,552,294	13,714,870	14,476,281	13,612,057

As at December 31, 2025, the placements with banks included reverse-repo securities, term deposits and loans and advances to credit institutions with maturity up to 3 months, which are also included in the consolidated and separate statement of cash flows, as follows: reverse-repo in amount of RON 2,748,801 thousand, deposits in amount of RON 10,907,392 thousand and loans and advances to credit institutions of RON 10,687 thousand at Group level, and reverse-repo in amount of RON 2,748,801 thousand, deposits in amount of RON 10,224,614 thousand and loans and advances to credit institutions in amount of RON 10,687 thousand at Bank level (2024: reverse-repo in amount of RON 1,000,412 thousand, deposits in amount of RON 9,031,928 thousand and loans and advances to credit institutions of RON 0 thousand at Group level, and reverse-repo in amount of RON 1,000,412 thousand, deposits in amount of RON 8,471,996 thousand and loans and advances to credit institutions in amount of RON 0 thousand at Bank level).

Except for sale and reverse-repo agreements, the amounts due from other banks are not guaranteed. The quality analysis of the placements with banks as at December 31, 2025 and December 31, 2024, according to the rating agencies is detailed below:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
	Placements with banks	Reverse repo transactions	Placements with banks	Reverse repo transactions
Investment grade	12,841,320	2,750,659	11,843,939	1,001,246
Non-investment grade	960,315	-	869,685	-
Total	13,801,635	2,750,659	12,713,624	1,001,246

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
	Placements with banks	Reverse repo transactions	Placements with banks	Reverse repo transactions
Investment grade	11,117,354	2,750,659	11,933,888	1,001,246
Non-investment grade	608,268	-	676,923	-
Total	11,725,622	2,750,659	12,610,811	1,001,246

The qualitative analysis regarding the placements with banks was based on the credit ratings issued by rating agencies. As concerns the Group's and the Bank's placements with credit institutions that are not rated by rating agencies sovereign rating was used.

The Investment-grade category includes the Group's and the Bank's placements with credit institutions having the following ratings: AA, AA-, A+, A, A-, BBB+, BBB, BBB-, Baa1.

The non-investment grade category includes the Group's and the Bank's placements with credit institutions having the following ratings: BB+, BB, BB-, B, B+, B-.

Notes to the consolidated and separate financial statements

21. Financial assets at fair value through profit or loss

a) Held-for-trading financial assets measured at fair value through profit or loss

The structure of financial assets held-for-trading and measured at fair value through profit or loss is presented in the table below:

In RON thousand	Group		Bank	
	2025	2024	2025	2024
Equity instruments	383,192	249,120	22,330	17,833
Debt instruments	208,663	140,697	-	-
Total	591,855	389,817	22,330	17,833

As at December 31, 2025, the Group held shares listed on the Bucharest Stock Exchange and on the main Stocks from Europe.

As at December 31, 2025, the Group owned significant investments amounting to RON 346,620 thousand in the following entities: Evergent Investments S.A. and Transilvania Investments Alliance S.A. (2024: RON 202,645 thousand in Evergent Investments S.A. and Transilvania Investments Alliance S.A.).

A qualitative analysis of financial assets held-for-trading and measured at fair value through profit or loss for the Group and for the Bank as at December 31, 2025 and December 31, 2024 is presented below:

In RON thousand	Group		Bank	
	2025	2024	2025	2024
Investment-grade	5,141	2,885	4,342	2,474
Non-investment grade	13,192	800	1,378	800
No rating (*)	573,522	386,132	16,610	14,559
Total	591,855	389,817	22,330	17,833

(*) They mainly represent the Group's and the Bank's investments in fund units and Romanian financial investment companies.

The analysis is based on ratings available at rating agencies.

The Investment-grade category includes financial assets at fair value through profit or loss with the following ratings: BBB+, BBB-.

The Non-Investment-grade category includes financial assets at fair value through profit or loss with rating BB-, BB.

The "no rating" category includes financial assets at fair value through profit or loss the issuers of which are not rated.

b) Financial assets which are required to be measured at fair value through profit or loss

The structure of financial assets which are required to be measured at fair value through profit or loss is presented in the table below:

In RON thousand	Group		Bank	
	2025	2024	2025	2024
Equity instruments (*)	408,636	406,759	408,636	373,337
Debt instruments	1,495,984	1,062,255	2,236,948	1,642,097
Total	1,904,620	1,469,014	2,645,584	2,015,434

(*) The Group and the Bank have included in this category the VISA and Mastercard shares, both the ordinary ones from category A / B, as well as the preferential ones from category C.

Notes to the consolidated and separate financial statements

21. Financial assets at fair value through profit or loss (continued)

b) Financial assets which are required to be measured at fair value through profit or loss (continued)

The following is an analysis of the quality of the Group's and the Bank's portfolio of the debt instruments which are required to be measured at fair value through profit or loss as at December 31, 2025 and as at December 31, 2024:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Investment-grade	492,691	363,187	492,691	363,187
Non-investment grade	-	-	-	-
No rating (*)	1,003,293	699,068	1,744,257	1,278,910
Total	1,495,984	1,062,255	2,236,948	1,642,097

(*) The vast majority of these represent the Group's and the Bank's investments in Romanian fund units and financial investment companies.

The Investment-grade category includes financial assets at fair value through profit or loss with the following ratings: A, A-.

The "No rating" category includes financial assets at fair value through profit or loss the issuers of which are not rated.

22. Loans and advances to customers

The Group's and Bank's commercial lending is concentrated on Romanian and Moldavian companies and individuals. The risk distribution of the credit portfolio at economic sector level, as at December 31, 2025 and December 31, 2024, is the following:

<i>In RON thousand</i>	Group		Bank	
	2025	2024 (**)	2025	2024 (**)
Retail	47,085,801	41,926,881	42,944,171	33,902,669
Government bodies	11,354,633	10,221,339	11,346,792	10,107,807
Financial institutions and insurance companies	1,629,078	1,511,080	8,813,955	7,345,469
Trading	9,804,618	9,671,511	8,511,205	7,921,676
Manufacturing	7,316,094	6,907,277	6,891,133	5,895,487
Real estate	5,669,062	4,599,634	5,663,238	3,268,275
Agriculture and forestry	4,315,913	4,483,984	4,012,495	3,567,576
Services	4,439,712	3,850,920	3,791,282	3,021,682
Transportation	3,714,214	3,298,744	3,310,499	2,736,393
Constructions	3,146,765	3,072,761	2,987,819	2,652,422
Energy industry	2,934,859	2,135,772	2,821,782	1,850,760
Health and social welfare services	1,882,470	1,812,776	1,842,003	1,771,846
Self-employed	1,832,109	1,412,545	1,204,926	1,088,856
Telecommunications	872,332	197,802	758,191	192,034
Others	317,239	609,212	249,982	567,174
Extractive industry	242,066	115,735	241,822	86,868
Chemical industry	132,302	160,921	120,192	119,460
Education	140,533	109,437	99,537	70,862
Fishing	23,254	16,932	20,355	15,083
Total loans and advances to customers before impairment allowance (*)	106,853,054	96,115,263	105,631,379	86,182,399
Allowances for impairment losses on loans	(6,407,047)	(5,335,637)	(5,940,298)	(4,792,410)
Total loans and advances to customers, net of impairment allowance	100,446,007	90,779,626	99,691,081	81,389,989

(*) Total loans and advances to customers before impairment allowance are diminished by the fair value adjustments for the portfolio of loans taken over through acquisitions, determined on the basis of the purchase price allocation report.

(**) To ensure comparability of classification by economic sectors, the data presented as of December 31, 2024, have been restated in accordance with the new version of the National Economy Activity Classification CAEN Rev. 3 (see note 2e(b)).

Notes to the consolidated and separate financial statements

22. Loans and advances to customers (*continued*)

The structure of the credit portfolio of the Group and the Bank as at December 31, 2025 and December 31, 2024 is the following:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Corporate	42,984,650	39,410,672	49,363,554	40,584,047
Small and medium enterprises	14,021,007	13,400,980	13,323,654	11,695,683
Consumer loans and card loans granted to retail customers	19,097,139	16,522,596	17,926,843	14,520,308
Mortgage loans	25,685,500	24,083,037	24,941,204	19,303,938
Loans granted by non-banking financial institutions	4,980,528	2,612,419	-	-
Other	84,230	85,559	76,124	78,423
Total loans and advances to customers before impairment allowance	106,853,054	96,115,263	105,631,379	86,182,399
Allowances for impairment losses on loans	(6,407,047)	(5,335,637)	(5,940,298)	(4,792,410)
Total loans and advances to customers net of impairment allowance	100,446,007	90,779,626	99,691,081	81,389,989

Notes to the consolidated and separate financial statements

22. Loans and advances to customers (*continued*)

The movement in impairment allowances on loans and advances to customers at Group level in 2025 was the following:

<i>In RON thousand</i>	Allowances for expected credit losses on loans and advances for which the credit risk has not significantly increased since the initial recognition, and which are not impaired (Stage 1)	Allowances for expected credit losses on loans and advances for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Allowances for expected credit losses on loans and advances to customers which are impaired (Stage 3)	Allowances for expected losses on assets impaired on initial recognition (POCI)	Total
Opening balance as at January 1, 2025	(1,501,542)	(1,948,502)	(1,836,375)	(49,218)	(5,335,637)
Increase due to issue or acquisition	(1,323,353)	(1,015,562)	(384,803)	-	(2,723,718)
Decrease due to derecognition	730,857	896,486	531,444	6,400	2,165,187
Increase or decrease due to the change in credit risk (net) and transfers	139,580	(395,249)	(970,611)	(2,630)	(1,228,910)
Increase or decrease due to changes without derecognition (net)	171,309	231,927	122,986	(81,442)	444,780
Decrease of impairment allowances due to write-offs and sales of loans portfolio	2	48,827	210,650	39,421	298,900
Other adjustments	(10,240)	(9,897)	(7,089)	(423)	(27,649)
Closing balance as at December 31, 2025	(1,793,387)	(2,191,970)	(2,333,798)	(87,892)	(6,407,047)

During the year 2025, the Group contractual amount outstanding in loans and advances to customers that were written off and are still subject to enforcement activity was in the amount RON 193,498 thousand. The total outstanding amount as at December 31, 2025 was RON 3,336,787 thousand.

Notes to the consolidated and separate financial statements

22. Loans and advances to customers (*continued*)

The movement in impairment allowances on loans and advances to customers at Bank level in 2025 was the following:

<i>In RON thousand</i>	Allowances for expected credit losses on loans and advances for which the credit risk has not significantly increased since the initial recognition, and which are not impaired (Stage 1)	Allowances for expected credit losses on loans and advances for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Allowances for expected credit losses on loans and advances to customers which are impaired (Stage 3)	Allowances for expected losses on assets impaired on initial recognition (POCI)	Total
Opening balance as at January 1, 2025	(1,420,521)	(1,818,407)	(1,526,282)	(27,200)	(4,792,410)
Increase due to issue or acquisition	(1,517,787)	(1,055,225)	(479,853)	-	(3,052,865)
Decrease due to derecognition	794,638	897,298	527,433	4,592	2,223,961
Increase or decrease due to the change in credit risk (net) and transfers	165,084	(354,341)	(887,694)	485	(1,076,466)
Increase or decrease due to changes without derecognition (net)	212,140	236,444	131,773	(81,477)	498,880
Decrease of impairment allowances due to write-offs and sales of loans portfolio	2	48,827	200,320	39,419	288,568
Other adjustments	(12,397)	(8,731)	(8,428)	(410)	(29,966)
Closing balance as at December 31, 2025	(1,778,841)	(2,054,135)	(2,042,731)	(64,591)	(5,940,298)

During the year 2025, the Bank contractual amount outstanding in loans and advances to customers that were written off and are still subject to enforcement activity was in the amount RON 166,875 thousand. The total outstanding amount as at December 31, 2025 was RON 2,834,249 thousand.

Notes to the consolidated and separate financial statements

22. Loans and advances to customers (*continued*)

The movement in impairment allowances on loans and advances to customers at Group level in 2024 was the following:

<i>In RON thousand</i>	Allowances for expected credit losses on loans and advances for which the credit risk has not significantly increased since the initial recognition, and which are not impaired (Stage 1)	Allowances for expected credit losses on loans and advances for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Allowances for expected credit losses on loans and advances to customers which are impaired (Stage 3)	Allowances for expected losses on assets impaired on initial recognition (POCI)	Total
Opening balance as at January 1, 2024	(1,328,178)	(1,730,647)	(1,607,808)	(40,901)	(4,707,534)
Increase due to issue or acquisition	(1,204,301)	(622,985)	(223,663)	-	(2,050,949)
Decrease due to derecognition	506,043	559,576	282,300	6,035	1,353,954
Increase or decrease due to the change in credit risk (net) and transfers	282,309	(307,632)	(582,499)	(19,921)	(627,743)
Increase or decrease due to changes without derecognition (net)	243,930	137,879	96,753	(7,019)	471,543
Increase or decrease due to the update of the institution's estimation methodology (net)	39	247	-	-	286
Decrease of impairment allowances due to write-offs	154	15,095	197,807	12,446	225,502
Other adjustments	(1,538)	(35)	735	142	(696)
Closing balance as at December 31, 2024	(1,501,542)	(1,948,502)	(1,836,375)	(49,218)	(5,335,637)

During the year 2024, the Group contractual amount outstanding in loans and advances to customers that were written off and are still subject to enforcement activity was in the amount RON 275,767 thousand. The total outstanding amount as at December 31, 2024 was RON 3,559,446 thousand.

Notes to the consolidated and separate financial statements

22. Loans and advances to customers (*continued*)

The movement in impairment allowances on loans and advances to customers at Bank level in 2024 was the following:

<i>In RON thousand</i>	Allowances for expected credit losses on loans and advances for which the credit risk has not significantly increased since the initial recognition, and which are not impaired (Stage 1)	Allowances for expected credit losses on loans and advances for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Allowances for expected credit losses on loans and advances to customers which are impaired (Stage 3)	Allowances for expected losses on assets impaired on initial recognition (POCI)	Total
Opening balance as at January 1, 2024	(1,301,239)	(1,677,555)	(1,356,393)	(35,621)	(4,370,808)
Increase due to issue or acquisition	(1,205,887)	(555,171)	(126,277)	-	(1,887,335)
Decrease due to derecognition	578,223	554,621	211,401	3,243	1,347,488
Increase or decrease due to the change in credit risk (net) and transfers	248,123	(297,779)	(535,700)	130	(585,226)
Increase or decrease due to changes without derecognition (net)	261,493	143,457	107,628	(6,826)	505,752
Decrease of impairment allowances due to write-offs	154	14,002	172,404	11,748	198,308
Other adjustments	(1,388)	18	655	126	(589)
Closing balance as at December 31, 2024	(1,420,521)	(1,818,407)	(1,526,282)	(27,200)	(4,792,410)

During the year 2024, the Bank contractual amount outstanding in loans and advances to customers that were written off and are still subject to enforcement activity was in the amount RON 169,119 thousand. The total outstanding amount as at December 31, 2024 was RON 2,652,846 thousand.

Notes to the consolidated and separate financial statements**23. Finance lease receivables**

The Group acts as a lessor under finance lease agreements, concluded mainly for financing motor vehicles and equipment. The lease agreements are denominated in EUR, RON and MDL and typically run for a period between 2 and maximum 10 years, with the transfer of ownership over the leased assets upon the termination of the lease agreement.

The lease receivables are secured by the underlying assets and by other collateral. The breakdown of finance lease receivables according to their contractual maturity is presented below:

<i>In RON thousand</i>	2025	2024
Finance lease receivables with maturity below 1 year, gross	2,607,558	2,367,470
Finance lease receivables with maturity between 1-2 years, gross	1,930,560	1,789,151
Finance lease receivables with maturity between 2-3 years, gross	1,395,291	1,289,248
Finance lease receivables with maturity between 3-4 years, gross	841,316	790,037
Finance lease receivables with maturity between 4-5 years, gross	379,521	324,513
Finance lease receivables with maturity above 5 years, gross	30,110	26,114
Total finance lease receivables, gross	<u>7,184,356</u>	<u>6,586,533</u>
Future interest related to finance lease receivables	(693,162)	(725,966)
Total finance lease receivables, net of future interest	6,491,194	5,860,567
Impairment allowances for finance lease receivables	(227,295)	(270,331)
Total finance lease receivables	<u>6,263,899</u>	<u>5,590,236</u>

The lease contracts are originated and managed by BT Leasing Transilvania IFN S.A. and BT Leasing Moldova S.R.L..

Notes to the consolidated and separate financial statements

23. Finance lease receivables (*continued*)

The movement in impairment allowances on finance lease receivable at Group level in 2025 was the following:

<i>In RON thousand</i>	Allowances for expected credit losses related to lease receivables for which the credit risk has not significantly increased since the initial recognition, and which are not impaired (Stage 1)	Allowances for expected credit losses related to lease receivables for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Allowances for expected credit losses on finance lease receivable to customers which are impaired (Stage 3)	Allowances for expected losses on assets impaired on initial recognition (POCI)	Total
Opening balance as at January 1, 2025	(48,560)	(80,585)	(123,081)	(18,105)	(270,331)
Increase due to issue or acquisition	(15,463)	(34,133)	(11,130)	-	(60,726)
Decrease due to derecognition	5,980	6,570	19,685	11,176	43,411
Increase or decrease due to the change in credit risk (net) and transfers	11,071	55,725	(7,198)	(5,719)	53,879
Increase or decrease due to changes without derecognition (net)	5	5	(115)	(531)	(636)
Increase or decrease due to the update of the institution's estimation methodology (net)	22,957	(23,670)	-	55	(658)
Decrease in the impairment allowance account due to off- balance sheet removals	-	-	6,002	1,778	7,780
Other adjustments	(35)	(92)	113	-	(14)
Closing balance as at December 31, 2025	(24,045)	(76,180)	(115,724)	(11,346)	(227,295)

During the year 2025, the Group contractual amount outstanding in finance lease receivable that were written off and are still subject to enforcement activity was in the amount RON 7,725 thousand. The total outstanding amount as at December 31, 2025 was RON 10,882 thousand.

Notes to the consolidated and separate financial statements

23. Finance lease receivables (*continued*)

The movement in impairment allowances on finance lease receivable at Group level in 2024 was the following:

<i>In RON thousand</i>	Allowances for expected credit losses related to lease receivables for which the credit risk has not significantly increased since the initial recognition, and which are not impaired (Stage 1)	Allowances for expected credit losses related to lease receivables for which the credit risk has significantly increased since the initial recognition, but which are not impaired (Stage 2)	Allowances for expected credit losses on finance lease receivable to customers which are impaired (Stage 3)	Allowances for expected losses on assets impaired on initial recognition (POCI)	Total
Opening balance as at January 1, 2024	(36,109)	(27,905)	(66,106)	(11,971)	(142,091)
Increase due to issue or acquisition	(24,194)	(24,473)	(19,184)	-	(67,851)
Decrease due to derecognition	5,583	2,002	8,159	3,546	19,290
Increase or decrease due to the change in credit risk (net) and transfers	5,894	(21,866)	(59,061)	(3,580)	(78,613)
Increase or decrease due to changes without derecognition (net)	655	1,045	3,243	(6,099)	(1,156)
Increase or decrease due to the update of the institution's estimation methodology (net)	-	-	-	-	-
Decrease in the impairment allowance account due to off- balance sheet removals	-	-	87	-	87
Other adjustments	(389)	(9,388)	9,781	(1)	3
Closing balance as at December 31, 2024	(48,560)	(80,585)	(123,081)	(18,105)	(270,331)

During the year 2024, the Group contractual amount outstanding in finance lease receivable that were written off and are still subject to enforcement activity was in the amount RON 3,247 thousand. The total outstanding amount as at December 31, 2024 was RON 6,957 thousand.

Notes to the consolidated and separate financial statements

24. Investment securities

a) Financial assets measured at fair value through other items of comprehensive income

In RON thousand

	Group		Bank	
	2025	2024	2025	2024
Debt instruments, of which:	34,362,239	43,780,045	33,824,795	43,102,794
- Central administrations	32,404,076	41,803,049	31,866,632	41,125,798
- Credit institutions	1,496,111	1,468,254	1,496,111	1,468,254
- Other financial companies	462,052	508,742	462,052	508,742
- Non-financial institutions	-	-	-	-
Equity instruments, of which:	263,505	171,366	25,948	22,780
- Other financial companies	237,867	141,588	22,672	19,973
- Non-financial institutions	25,638	29,778	3,276	2,807
Loans and advances, of which:	-	25,924	-	25,924
- Central administrations	-	25,924	-	25,924
Total	34,625,744	43,977,335	33,850,743	43,151,498

As at December 31, 2025, the Group and the Bank hold equity instruments valued at fair value through other items of comprehensive income under the form of participations mainly in Transfond, Biroul de Credit, Swift Belgium, CCP RO Bucuresti S.A., Depozitarul Central S.A., Evergent Investments S.A., Fortalis Holding S.A. and Morphosis Capital Fund I Cooperatief U.A..

The investment in such equity instruments as at December 31, 2025 at Group level amounted to RON 263,505 thousand (2024: RON 171,366 thousand) and at Bank level RON 25,948 thousand (2024: RON 22,780 thousand). During 2025, the dividends received by the Group for these equity instruments investment were in the amount of RON 18,929 thousand (2024: RON 15,668 thousand), and at the level of the Bank in the amount of RON 9,052 thousand (2024: RON 7,143 thousand).

The Bank also includes in this category bonds, that are held for the purpose of collecting future cashflows or sale, in order to obtain certain returns or manage liquidity.

Notes to the consolidated and separate financial statements

24. Investment securities (continued)

a) Financial assets measured at fair value through other items of comprehensive income (continued)

Qualitative analysis of the bonds held by the Group and the Bank as at December 31, 2025, classified as “Financial assets measured at fair value through other items of comprehensive income”, depending on the issuer’s rating:

In RON thousand	Central administrations	Credit institutions	Group Other financial corporations	Non- financial corporations	Total	Central administrations	Credit institutions	Bank Other financial corporations	Non- financial corporations	Total
Debt instruments, of which	32,404,076	1,496,111	462,052	-	34,362,239	31,866,632	1,496,111	462,052	-	33,824,795
A	-	404,008	-	-	404,008	-	404,008	-	-	404,008
A-	55,856	609,048	170,499	-	835,403	55,856	609,048	170,499	-	835,403
A+	-	-	118,866	-	118,866	-	-	118,866	-	118,866
AAA	598,166	137,258	-	-	735,424	598,166	137,258	-	-	735,424
B-	1,964	-	-	-	1,964	-	-	-	-	-
BB	-	-	47,811	-	47,811	-	-	47,811	-	47,811
BBB	706,700	167,977	124,876	-	999,553	706,700	167,977	124,876	-	999,553
BBB-	31,041,390	-	-	-	31,041,390	30,505,910	-	-	-	30,505,910
BBB+	-	105,445	-	-	105,445	-	105,445	-	-	105,445
DD	-	72,375	-	-	72,375	-	72,375	-	-	72,375

As at December 31, 2025, the Group and the Bank hold past due or impaired debt instruments classified as „Financial assets measured at fair value through other items of comprehensive income” in amount of RON 72,375 thousand (December 31, 2024: RON 72,375 thousand).

Notes to the consolidated and separate financial statements

24. Investment securities (continued)

a) Financial assets measured at fair value through other items of comprehensive income (continued)

Qualitative analysis of the bonds held by the Group and the Bank as at December 31, 2024, classified as “Financial assets measured at fair value through other items of comprehensive income”, depending on the issuer’s rating:

In RON thousand	Central administrations	Credit institutions	Group Other financial corporations	Non- financial corporations	Total	Central administrations	Credit institutions	Bank Other financial corporations	Non- financial corporations	Total
Debt instruments, of which	41,803,049	1,468,254	508,742	-	43,780,045	41,125,798	1,468,254	508,742	-	43,102,794
A	-	380,588	217,815	-	598,403	-	380,588	217,815	-	598,403
A-	53,969	631,977	12,345	-	698,291	-	631,977	12,345	-	644,322
A+	-	-	114,595	-	114,595	-	-	114,595	-	114,595
AAA	572,719	122,489	-	-	695,208	572,719	122,489	-	-	695,208
B	-	-	-	-	-	-	-	-	-	-
B-	3,104	-	-	-	3,104	-	-	-	-	-
BB	-	-	-	-	-	-	-	-	-	-
BB-	-	-	-	-	-	-	-	-	-	-
BB+	45	-	45,972	-	46,017	45	-	45,972	-	46,017
BBB	145,799	159,388	118,015	-	423,202	145,799	159,388	118,015	-	423,202
BBB-	41,027,413	-	-	-	41,027,413	40,407,235	-	-	-	40,407,235
BBB+	-	101,437	-	-	101,437	-	101,437	-	-	101,437
DD	-	72,375	-	-	72,375	-	72,375	-	-	72,375
Loans and advances, of which	25,924	-	-	-	25,924	25,924	-	-	-	25,924
BB-	25,924	-	-	-	25,924	25,924	-	-	-	25,924

Notes to the consolidated and separate financial statements

24. Investment securities (continued)

a) Financial assets measured at fair value through other items of comprehensive income (continued)

Evolution of securities in the category “Financial assets measured at fair value through other items of comprehensive income”:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
As at January 1	43,977,335	40,600,026	43,151,498	40,264,202
Acquisitions (*)	6,342,085	23,150,824	6,368,920	22,008,977
Sales and repurchases (**)	(16,992,173)	(19,733,896)	(16,874,810)	(19,066,532)
Coupon and amortization in profit or loss during the year (Note 8)	1,826,140	1,617,767	1,796,865	1,600,624
Coupon collected, at term, during the year	(1,911,602)	(1,560,746)	(1,881,891)	(1,553,070)
Gain/(Loss) from the measurement at fair value	1,325,428	(240,534)	1,235,076	(247,712)
Exchange rate differences	58,531	143,894	55,085	145,009
As at December 31	34,625,744	43,977,335	33,850,743	43,151,498

(*) At the Bank level, the financial assets measured at fair value through other comprehensive income items entered through the merger from OTP Bank Romania S.A. are also included.

(**) Represents the amounts collected from the sale and maturity of financial assets at fair value through other comprehensive income.

Notes to the consolidated and separate financial statements

24. Investment securities (continued)

a) Financial assets measured at fair value through other items of comprehensive income (continued)

As at December 31, 2025, out of the treasury securities held by the Bank, the amount of RON 165,000 thousand (2024: RON 165,000 thousand) was pledged for current operations (RoCLEAR, SENT, MASTERCARD and VISA).

The treasury securities and bonds issued by the Romanian Government have maturities between 2026 and 2053.

As at December 31, 2025, the Bank concluded repo transactions with other financial institutions, backed by financial assets measured at fair value through other items of comprehensive income in amount of RON 1,161,753 thousand (2024: RON 162,603 thousand). The securities pledged under repo agreements may be sold or re-pledged by the counterparty.

The interest rates on financial assets measured at fair value through other comprehensive income were within the following ranges:

	2025		2024	
	Minimum	Maximum	Minimum	Maximum
EUR	0.00%	6.63%	0.00%	6.63%
RON	0.00%	9.08%	0.00%	9.08%
USD	1.25%	7.63%	1.25%	7.63%
MDL	0.00%	14.00%	0.00%	14.00%
PLN	1.00%	1.00%	1.00%	1.00%
HUF	1.50%	1.50%	n/a	n/a

b) Financial assets at amortized cost - debt instruments

In 2025, the Group holds and classifies as financial assets measures at amortized cost - debt instruments, bonds in amount of RON 31,939,806 thousand (2024: RON 22,401,071 thousand) and the Bank acquired bonds in amount of RON 29,871,314 thousand (2024: RON 19,376,763 thousand).

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Debt instruments, of which				
- Central banks	-	585,123	-	-
- Central administrations	30,833,597	19,356,757	28,765,105	16,917,571
- Credit institutions	777,413	867,818	777,413	867,818
- Other financial companies	254,884	1,523,608	254,884	1,523,608
- Non-financial institutions	73,912	67,765	73,912	67,766
Total	31,939,806	22,401,071	29,871,314	19,376,763

Notes to the consolidated and separate financial statements

24. Investment securities (continued)

b) Financial assets at amortized cost - debt instruments (continued)

Qualitative analysis of the financial assets measures at amortized cost - debt instruments held by the Group as at December 31, 2025 and December 31, 2024, depending on the issuer's rating:

December 31, 2025

	Group					
In RON thousand	Central banks	Central administrations	Credit institutions	Other financial corporations	Non-financial corporations	Total
Debt instruments, of which	-	30,833,597	777,413	254,884	73,912	31,939,806
A	-	-	-	-	-	-
A-	-	387,232	255,343	-	-	642,575
A+	-	768,701	-	-	-	768,701
B	-	-	-	-	50,324	50,324
B-	-	1,980,253	-	-	-	1,980,253
B+	-	-	-	-	23,588	23,588
BB	-	-	207,043	-	-	207,043
BBB	-	2,792,474	196,375	-	-	2,988,849
BBB-	-	24,904,937	-	254,884	-	25,159,821
BBB+	-	-	118,652	-	-	118,652

December 31, 2024

	Group					
In RON thousand	Central banks	Central administrations	Credit institutions	Other financial corporations	Non-financial corporations	Total
Debt instruments, of which	585,123	19,356,757	867,818	1,523,608	67,765	22,401,071
A	-	-	116,945	17,434	-	134,379
A-	-	-	249,105	-	-	249,105
A+	-	-	-	996,707	-	996,707
AA	-	-	-	250,624	-	250,624
B	-	-	-	-	45,048	45,048
B-	585,123	1,407,475	-	-	-	1,992,598
B+	-	-	-	-	22,717	22,717
BB	-	-	201,352	-	-	201,352
BBB	-	-	181,768	-	-	181,768
BBB-	-	17,949,282	-	248,723	-	18,198,005
BBB+	-	-	118,648	10,120	-	128,768

Notes to the consolidated and separate financial statements

24. Investment securities (continued)

b) Financial assets at amortized cost - debt instruments (continued)

Qualitative analysis of the financial assets measures at amortized cost - debt instruments held by the Bank as at December 31, 2025 and December 31, 2024, depending on the issuer's rating:

December 31, 2025

In RON thousand Debt instruments, of which	Bank				Total
	Central administrations	Credit institutions	Other financial corporations	Non-financial corporations	
	28,765,105	777,413	254,884	73,912	29,871,314
A-	387,232	255,343	-	-	642,575
A+	768,701	-	-	-	768,701
B	-	-	-	50,324	50,324
B+	-	-	-	23,588	23,588
BB	-	207,043	-	-	207,043
BBB	2,792,474	196,375	-	-	2,988,849
BBB-	24,816,698	-	254,884	-	25,071,582
BBB+	-	118,652	-	-	118,652

December 31, 2024

In RON thousand Debt instruments, of which	Bank				Total
	Central administrations	Credit institutions	Other financial corporations	Non-financial corporations	
	16,917,571	867,818	1,523,608	67,766	19,376,763
A	-	116,945	17,434	-	134,379
A-	-	249,105	-	-	249,105
A+	-	-	996,707	-	996,707
AA	-	-	250,624	-	250,624
B	-	-	-	45,049	45,049
B+	-	-	-	22,717	22,717
BB	-	201,352	-	-	201,352
BBB	-	181,768	-	-	181,768
BBB-	16,917,571	-	248,723	-	17,166,294
BBB+	-	118,648	10,120	-	128,768

The movement of securities in the category of financial assets measured at amortized cost - debt instruments is presented in the table below:

In RON thousand	Group		Bank	
	2025	2024	2025	2024
As at January 1	22,401,071	9,472,245	19,376,763	7,980,072
Acquisitions (*)	28,283,404	34,862,081	18,263,487	15,933,592
Sales and repurchases	(19,194,016)	(22,287,835)	(8,074,911)	(4,798,970)
Coupon and amortization in P&L during the year (Note 8)	1,490,322	958,769	1,324,622	845,239
Coupon collected, at term, during the year	(1,219,818)	(616,583)	(1,200,974)	(605,949)
Recognition of expected credit losses (ECL) in accordance with IFRS 9	3,426	(33,532)	10,574	(26,506)
Exchange rate differences	175,417	45,926	171,753	49,285
As at December 31	31,939,806	22,401,071	29,871,314	19,376,763

(*) At the Bank level, the financial assets measured at amortised cost entered through the merger from OTP Bank Romania S.A. are also included.

Banca Transilvania S.A.

Notes to the consolidated and separate financial statements

25. Investment in subsidiaries

As at December 31, 2025, the Bank had direct stakes in subsidiaries in amount of RON 1,373,464 thousand (2024: RON 2,644,703 thousand) and the impairment allowance amounted to RON 67,543 thousand (2024: RON 51,317 thousand).

As of December 31, 2025, the subsidiaries in which the Bank directly and indirectly holds shareholdings are the following:

Entity	Head Office	% of shares owned	Share capital	Reserves	Profit/(Loss) as at December 31, 2025
BT Leasing Transilvania IFN S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, first floor	100%	63,430	16,895	379,812
BT Capital Partners S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, ground floor	99.62%	19,478	3,898	37,779
BT Direct IFN S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, 3rd floor	100%	146,331	24,987	48,833
BT Investments S.R.L.	Cluj-Napoca, 36 Eroilor Boulevard	100%	50,940	3,086	(174)
BT Asset Management SAI S.A.	Cluj-Napoca, 22 Emil Racovita Street, first floor	100%	7,166	143,084	49,077
BT Leasing Moldova S.R.L.	Republic of Moldova, Chisinau, 60 A, Puskin Street Bucuresti, District 4, U-Center, A Building, 206 Calea Serban Voda Street, 4 th floor	100%	5,336	494	6,621
BT Microfinantare IFN S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, second floor	100%	46,760	13,555	88,521
Improvement Credit Collection S.R.L.	Republic of Moldova, Chisinau, 141 31 August 1989 Street	100%	901	1,740	15,338
B.C. VICTORIABANK S.A.	Bucuresti, 75-77 Buzesti Street, 5 th floor	44.63%	57,375	5,738	192,950
BT Pensii S.A.	Bucuresti, District 2, 5-7 Dimitrie Pompei Boulevard, 6 th floor	100%	20,731	83	505
Salt Bank S.A.	Bucuresti, District 1, 19-21 Bucuresti-Ploiesti Boulevard, Baneasa Business Center, 2 nd floor	100%	680,438	6,829	(244,478)
BT Broker de Asigurare S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	150	30	69,902
BTP ONE S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	99.73%	29,000	232	7,106
BTP STORE HUB TURDA S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	99.73%	23,636	84	4,732
INTER TERRA S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	99.73%	4	1	7,197
INNO Investments S.A.I. S.A.	Bucuresti, District 1, 43 Alea Alexandru Street	100%	5,795	10,545	472
VB Investment Holding B.V.	Netherlands, Amsterdam, 423 Westerdoksdijk	61.82%	839	(50,997)	50,877
O.C.N. Microinvest S.R.L.	Republic of Moldova, Chisinau, 12 Renașterii Naționale Boulevard	44.63%	27,822	2,923	32,394
BRD Societate de Administrare a Fondurilor de Pensii Private S.A.	București, District 1, 58-60 Gheorghe Polizu Street, first floor	100%	32,349	627	(29)
BTP Retail S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	99.73%	8,900	-	(159)
Code Crafters by BT	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	10	2	10,450
BTP STORE HUB ORADEA S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	99.73%	100	-	(6)
OTP Factoring S.R.L.	Bucuresti, District 1, 4-8 Nicolae Titulescu Av., 4 th floor	100%	-	-	(2,968)
Secure Cash Express S.R.L.	Cluj, Juc Herghelie Village, 5 Leonardo da Vinci Street	100%	1,702	-	(4)
Microinvest Technology S.R.L.	Republic of Moldova, Chisinau, 12 Renașterii Naționale Boulevard	44.63%	1	-	1
Total			1,229,194	183,836	754,749

Banca Transilvania S.A.

Notes to the consolidated and separate financial statements

25. Investment in subsidiaries (continued)

As of December 31, 2024, the subsidiaries in which the Bank directly and indirectly holds shareholdings are the following:

Entity	Head Office	% of shares owned	Share capital	Reserves	Profit/(Loss) as at December 31, 2024
BT Leasing Transilvania IFN S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, first floor	100%	63,430	12,380	193,008
BT Capital Partners S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, ground floor	99.62%	19,478	3,837	25,547
BT Direct IFN S.A.	Cluj-Napoca, 74-76 C-tin Brancusi Street, 3rd floor	100%	116,331	22,098	52,088
BT Building S.R.L.	Cluj-Napoca, 1 George Baritiu Street	100%	40,448	1,623	6,195
BT Investments S.R.L.	Cluj-Napoca, 36 Eroilor Boulevard	100%	50,940	3,086	3,090
BT Asset Management SAI S.A.	Cluj-Napoca, 22 Emil Racovita Street, first floor	100%	7,166	112,816	37,505
BT Leasing Moldova S.R.L.	Republic of Moldova, Chisinau, 60 A, Puskin Street	100%	5,336	494	6,186
BT Microfinantare IFN S.A.	Bucuresti, District 4, U-Center, A Building, 206 Calea Serban Voda Street, 4 th floor	100%	46,760	13,064	72,277
Improvement Credit Collection S.R.L.	Cluj-Napoca, 74-76 C-tin Brancusi Street, second floor	100%	901	1,740	12,588
B.C. VICTORIABANK S.A.	Republic of Moldova, Chisinau, 141 31 August 1989 Street	44.63%	57,375	5,738	155,319
Banca Comerciala Romana Chisinau S.A.	Republic of Moldova, Chisinau, Riscani Sec., 60/2 A. Puskin Street	44.63%	185,746	8,310	12,573
BT Pensii S.A.	Bucuresti, 75-77 Buzesti Street, 5 th floor	100%	20,731	83	(1,817)
Salt Bank S.A.	Bucuresti, District 2, 5-7 Dimitrie Pompei Boulevard, 6 th floor	100%	459,150	17,394	(152,504)
Avant Leasing IFN S.A.	Bucuresti, District 1, 19-21 Bucuresti-Ploiesti Boulevard, Baneasa Business Center, 2 nd floor	100%	9,503	1,877	8,021
BT Broker de Asigurare S.R.L.	Bucuresti, District 1, 19-21 Bucuresti-Ploiesti Boulevard, Baneasa Business Center, 2 nd floor	100%	150	30	51,988
BTP ONE S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	29,000	140	4,081
BTP Retail S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	3,100	-	(44)
BTP STORE HUB TURDA S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	23,636	23	1,201
INTER TERRA S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	4	1	-
OTP BANK ROMANIA S.A.	Bucuresti, District 1, 66-68 Buzesti Street	100%	2,322,004	94,223	48,899
OTP ASSET MANAGEMENT ROMANIA SAI S.A.	Bucuresti, District 1, 43 Alea Alexandru Street	100%	5,795	8,559	395
VB Investment Holding B.V.	Netherlands, Amsterdam, 423 Westerdoksdijk	61.82%	839	(2,244)	30,984
Code Crafters by BT	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	10	2	4,954
BT Asiom Agent de Asigurare S.R.L.	Cluj-Napoca, 74-76 C-tin Brancusi Street, first floor	100%	-	-	1,154
BT Intermedieri Agent de Asigurare S.R.L.	Cluj-Napoca, 74-76 C-tin Brancusi Street, first floor	100%	-	-	923
BT Safe Agent de Asigurare S.R.L.	Cluj-Napoca, 74-76 C-tin Brancusi Street, first floor	100%	-	-	(9)
BT Solution Agent de Asigurare S.R.L.	Cluj-Napoca, 74-76 C-tin Brancusi Street, first floor	100%	-	-	(115)
OTP Advisors S.R.L.	Bucuresti, District 3, 1 Traian Street	100%	9,229	70	327
GOVKA Project Company S.R.L.	Bucuresti, District 1, 4-8 Nicolae Titulescu Av., 4 th floor	100%	20	4	175
REA Project One Company S.R.L.	Bucuresti, District 1, 4-8 Nicolae Titulescu Av., 4 th floor	100%	20	4	19
BTP STORE HUB ORADEA S.R.L.	Cluj-Napoca, 30-36 Calea Dorobantilor Street	100%	100	-	(5)
OTP Factoring S.R.L.	Bucuresti, District 1, 4-8 Nicolae Titulescu Av., 4 th floor	100%	600	120	(259)
OTP Consulting România S.R.L.	Bucuresti, District 1, 43 Alea Alexandru Street	100%	280	56	(1,365)
Total			3,478,082	305,528	573,379

Notes to the consolidated and separate financial statements

26. Property and equipment and investment property

<i>Group - In RON thousand Gross carrying amount</i>	Investment property	Land & buildings	Computers and equipment	Vehicles	Fixed assets in progress	Total
Balance as at January 1, 2025	272,710	970,028	1,070,220	132,554	94,655	2,540,167
Acquisitions of tangible assets and investment property	-	4,256	3,655	2,198	271,581	281,690
Tangible assets related to acquisition	177	9,616	6,840	1,316	4,346	22,295
Reclassification from investments in progress	76	78,633	147,964	6,268	(232,941)	-
Revaluation (impact on reserve)	-	930	1,103	5,941	-	7,974
Revaluation (impact on profit or loss statement)	12,439	(347)	-	6	-	12,098
Disposals	(884)	(107,132)	(121,479)	(30,560)	(1,735)	(261,790)
Reclassification of tangible assets into tangible assets held for sale		(25,446)	-	-		(25,446)
Balance at December 31, 2025	284,518	930,538	1,108,303	117,723	135,906	2,576,988
Balance as at January 1, 2024	86,780	857,510	963,848	101,858	88,855	2,098,851
Acquisitions of tangible assets and investment property	-	8,696	7,289	2,624	242,536	261,145
Tangible assets related to acquisition	155,127	113,954	38,123	14,145	2,529	323,878
Reclassification from investments in progress	-	55,775	151,804	29,943	(237,522)	-
Revaluation (impact on reserve)	31,167	2,951	2,946	3,663	-	40,727
Revaluation (impact on profit or loss statement)	68	97	-	-	-	165
Disposals	(432)	(68,955)	(93,790)	(19,679)	(1,743)	(184,599)
Balance at December 31, 2024	272,710	970,028	1,070,220	132,554	94,655	2,540,167

Notes to the consolidated and separate financial statements

26. Property and equipment and investment property (continued)

Amortization and depreciation

Group - In RON thousand

	Investment property	Land & buildings	Computers and equipment	Vehicles	Fixed assets in progress	Total
Balance as at January 1, 2025	423	268,926	559,201	56,244	-	884,794
Charge for the year	-	56,912	119,877	21,736	-	198,525
Accumulated depreciation of disposals	(16)	(78,721)	(108,368)	(22,666)	-	(209,771)
Amortization related to revaluation (impact on reserve)	-	(415)	-	-	-	(415)
Amortization related to revaluation (impact on profit or loss statement)	-	(6)	-	-	-	(6)
Reclassification of assets into assets held for sale	-	(7,273)	-	-	-	(7,273)
Balance at December 31, 2025	407	239,423	570,710	55,314	-	865,854
Balance as at January 1, 2024	-	250,141	518,986	50,821	-	819,948
Charge for the year	-	44,237	115,427	21,821	-	181,485
Accumulated depreciation of disposals	-	(26,414)	(75,184)	(16,398)	-	(117,996)
Amortization related to revaluation (impact on reserve)	-	927	-	-	-	927
Amortization related to revaluation (impact on profit or loss statement)	-	35	(28)	-	-	7
Impairment provision	423	-	-	-	-	423
Balance at December 31, 2024	423	268,926	559,201	56,244	-	884,794
Net carrying amount						
As at January 1, 2025	272,287	701,102	511,019	76,310	94,655	1,655,373
As at December 31, 2025	284,111	691,115	537,593	62,409	135,906	1,711,134

Notes to the and separate financial statements

26. Property and equipment and investment property (continued)

Bank - In RON thousand

Gross carrying amount

Balance as at January 1, 2025

Acquisitions of tangible assets and investment property

Tangible assets related to mergers and acquisitions

Reclassification from investments in progress

Revaluation (impact on reserve)

Revaluation (impact on profit or loss statement)

Disposals

Reclassification of assets into assets held for sale

Balance at December 31, 2025

Balance as at January 1, 2024

Acquisitions of tangible assets and investment property

Reclassification from investments in progress

Revaluation (impact on reserve)

Revaluation (impact on profit or loss statement)

Disposals

Balance at December 31, 2024

Bank - In RON thousand

Amortization and depreciation

Balance as at January 1, 2025

Charge for the year

Accumulated depreciation of disposals

Amortization related to revaluation (impact on reserve)

Amortization related to revaluation (impact on profit or loss statement)

Reclassification of assets into assets held for sale

Balance at December 31, 2025

Balance as at January 1, 2024

Charge for the year

Accumulated depreciation of disposals

Amortization related to revaluation (impact on reserve)

Amortization related to revaluation (impact on profit or loss statement)

Balance at December 31, 2024

Net carrying amount

As at January 1, 2025

As at December 31, 2025

	Investment property	Land & buildings	Computers and equipment	Vehicles	Fixed assets in progress	Total
Balance as at January 1, 2025	1,655	519,619	913,401	93,924	76,938	1,605,537
Acquisitions of tangible assets and investment property	-	-	-	46	246,918	246,964
Tangible assets related to mergers and acquisitions	748	312,070	37,193	1,937	4,067	356,015
Reclassification from investments in progress	-	66,759	129,472	6,268	(202,499)	-
Revaluation (impact on reserve)	-	1,706	1,092	5,941	-	8,739
Revaluation (impact on profit or loss statement)	39	(347)	-	-	-	(308)
Disposals	-	(82,330)	(60,571)	(8,473)	(1,310)	(152,684)
Reclassification of assets into assets held for sale	-	(25,446)	-	-	-	(25,446)
Balance at December 31, 2025	2,442	792,031	1,020,587	99,643	124,114	2,038,817
Balance as at January 1, 2024	1,587	488,059	804,845	73,311	79,358	1,447,160
Acquisitions of tangible assets and investment property	-	-	-	71	207,982	208,053
Reclassification from investments in progress	-	47,392	132,153	29,677	(209,222)	-
Revaluation (impact on reserve)	-	2,944	2,876	3,663	-	9,483
Revaluation (impact on profit or loss statement)	68	97	-	-	-	165
Disposals	-	(18,873)	(26,473)	(12,798)	(1,180)	(59,324)
Balance at December 31, 2024	1,655	519,619	913,401	93,924	76,938	1,605,537
Balance as at January 1, 2025	-	227,806	510,608	37,389	-	775,803
Charge for the year	-	47,877	101,350	16,051	-	165,278
Accumulated depreciation of disposals	-	(61,614)	(54,137)	(7,744)	-	(123,495)
Amortization related to revaluation (impact on reserve)	-	632	-	-	-	632
Amortization related to revaluation (impact on profit or loss statement)	-	(6)	-	-	-	(6)
Reclassification of assets into assets held for sale	-	(7,273)	-	-	-	(7,273)
Balance at December 31, 2025	-	207,422	557,821	45,696	-	810,939
Balance as at January 1, 2024	-	209,850	446,285	35,612	-	691,747
Charge for the year	-	35,620	89,452	13,127	-	138,199
Accumulated depreciation of disposals	-	(18,626)	(25,129)	(11,350)	-	(55,105)
Amortization related to revaluation (impact on reserve)	-	927	-	-	-	927
Amortization related to revaluation (impact on profit or loss statement)	-	35	-	-	-	35
Balance at December 31, 2024	-	227,806	510,608	37,389	-	775,803
As at January 1, 2025	1,655	291,813	402,793	56,535	76,938	829,734
As at December 31, 2025	2,442	584,609	462,766	53,947	124,114	1,227,878

Notes to the consolidated and separate financial statements

26. Property and equipment and investment property (continued)

As at December 31, 2025, the Group and the Bank did not have any pledged tangible or intangible assets. Property and equipment as at December 31, 2025 were revaluated by an independent evaluator. If the fixed assets of the Group had been booked under the cost model, the recognized carrying amount would have been: land and buildings: RON 626,565 thousand (2024: RON 640,298 thousand), investment property RON 282,562 thousand (2024: RON 270,547 thousand), computers and equipment RON 531,889 thousand (2024: RON 518,656 thousand), vehicles RON 49,663 thousand (2024: RON 64,218 thousand), fixed assets in progress RON 135,906 thousand (2024: RON 94,655 thousand).

If the assets of the Bank had been booked under the cost model, the recognized carrying amount would have been: land and buildings RON 563,453 thousand (2024: RON 267,641 thousand), investment property RON 893 thousand (2024: RON 145 thousand), computers and equipment RON 460,042 thousand (2024: RON 398,636 thousand), vehicles RON 47,613 thousand (2024: RON 52,354 thousand), fixed assets in progress RON 124,114 thousand (2024: RON 76,938 thousand).

27. Intangible assets (including goodwill)

In RON thousand

Gross carrying amount

Balance as at January 1, 2025

Entry by acquisition and mergers

Acquisitions

Disposals

Balance as at December 31, 2025

Balance as at January 1, 2024

Entry by acquisition

Acquisitions

Disposals

Balance as at December 31, 2024

Accumulated amortization

Balance as at January 1, 2025

Charge for the year

Disposals

Impairment provision

Balance as at December 31, 2025

Balance as at January 1, 2024

Charge for the year

Disposals

Impairment provision

Balance as at December 31, 2024

Net carrying amount

As at January 1, 2025

As at December 31, 2025

	Group	Bank
	Goodwill	Software
	Software	Software
Balance as at January 1, 2025	156,915	1,660,873
Entry by acquisition and mergers	-	53,139
Acquisitions	64	521,679
Disposals	-	(267,423)
Balance as at December 31, 2025	156,979	1,968,268
Balance as at January 1, 2024	154,363	1,346,336
Entry by acquisition	-	69,563
Acquisitions	2,552	510,851
Disposals	-	(265,877)
Balance as at December 31, 2024	156,915	1,660,873
Balance as at January 1, 2025	-	687,651
Charge for the year	-	209,408
Disposals	-	(197,386)
Impairment provision	-	(7)
Balance as at December 31, 2025	-	699,666
Balance as at January 1, 2024	-	652,665
Charge for the year	-	178,708
Disposals	-	(144,220)
Impairment provision	-	498
Balance as at December 31, 2024	-	687,651
Net carrying amount		
As at January 1, 2025	156,915	973,222
As at December 31, 2025	156,979	1,268,602

Notes to the consolidated and separate financial statements

27. Intangible assets (including goodwill) (continued)

Impairment testing for cash generating units included in the goodwill

For the purpose of impairment testing, the goodwill is allocated to the Group's operating divisions which represent the lowest level at which the goodwill is monitored for internal management purposes.

Goodwill represents the excess of the consideration paid over the fair value of the acquired entity's net identifiable assets at the acquisition date. As of December 31, 2025, the goodwill carrying value at Group level was in amount of RON 156,979 thousand (2024: RON 156,915 thousand). As at December 31, 2025 the goodwill allocated by the Group to BT Leasing Transilvania IFN S.A. was of RON 140,019 thousand, the goodwill allocated to BT Asset Management S.A. was of RON 10,908 thousand, the goodwill allocated to BT Pensii S.A. was of RON 3,436 thousand, the goodwill allocated to Inter Terra S.R.L. was of RON 2,616 thousand (2024: RON 140,019 thousand, the goodwill allocated to BT Asset Management S.A. was of RON 10,908 thousand, the goodwill allocated to BT Pensii S.A. was of RON 3,436 thousand, the goodwill allocated to Inter Terra S.R.L. was of RON 2,552 thousand).

According to IAS 36, goodwill is tested for impairment at least annually, even if there are no impairment indicators. Goodwill is impaired when its carrying amount of the unit (including allocated goodwill) exceeds the recoverable amount of the unit. The recoverable amount of a cash generating unit (CGU) is defined as the higher of the fair value less cost to sell and the value in use, where the value in use is the present value of the future cash flows.

The hypothesis used for the future cash flows analysis are as follows, being derived both from internal and external factors:

- entity budget as approved by its management for a period of 3 years (2026-2028) which takes into account the forecasted macro-economic conditions for this period;
- a terminal value at the end of the 3 years based on an annual growth rate of 3% based on company estimates;
- a discount rate between 10%-16%, depending on the entity, which represents the cost of equity of the company.

Considering the above-mentioned elements, the Group concluded that the impairment loss related to goodwill as of December 31, 2025 is null.

28. Right of use assets and lease liabilities

The Group and the Bank have lease agreements on land, buildings and vehicles. Rental contracts are typically made for fixed periods of 1 year to 95 years, but may have extension options as described below.

As at December 31, 2025 and December 31, 2024, the right of use assets of the Group by class of underlying items is analyzed as follows:

<i>In RON thousand</i>	Group				
	Lands	Buildings	Auto	Equipment	Total
Carrying amount at January 1, 2025	4,815	563,311	18,336	172	586,634
Entry by acquisition	-	4,489	25	84	4,598
Additions	2,401	192,494	7,942	1,135	203,972
Disposals	(87)	(52,498)	(2,907)	(66)	(55,558)
Depreciation charge	(1,117)	(143,507)	(5,693)	(126)	(150,443)
Carrying amount at December 31, 2025	6,012	564,289	17,703	1,199	589,203

Notes to the consolidated and separate financial statements

28. Right of use assets and lease liabilities (*continued*)

<i>In RON thousand</i>	Group				
	Lands	Buildings	Auto	Equipment	Total
Carrying amount at January 1, 2024	6,522	492,191	15,347	-	514,060
Entry by acquisition	-	22,420	505	268	23,193
Additions	416	241,370	10,582	-	252,368
Disposals	(894)	(42,755)	(2,831)	-	(46,480)
Depreciation charge	(1,229)	(149,915)	(5,267)	(96)	(156,507)
Carrying amount at December 31, 2024	4,815	563,311	18,336	172	586,634

As at December 31, 2025 and December 31, 2024, the right of use assets of the Bank by class of underlying items is analyzed as follows:

<i>In RON thousand</i>	Bank				
	Lands	Buildings	Auto	Equipment	Total
Carrying amount at January 1, 2025	4,609	756,442	8,144	-	769,195
Additions	1,765	182,477	4,493	-	188,735
Disposals (*)	(83)	(261,171)	(2,479)	-	(263,733)
Depreciation charge	(945)	(131,075)	(2,476)	-	(134,496)
Carrying amount at December 31, 2025	5,346	546,673	7,682	-	559,701

(*) Includes effects from merger with BT Building S.R.L.

<i>In RON thousand</i>	Bank				
	Lands	Buildings	Auto	Equipment	Total
Carrying amount at January 1, 2024	5,231	683,531	9,201	-	697,963
Additions	416	257,675	3,866	-	261,957
Disposals	(3)	(37,636)	(2,428)	-	(40,067)
Depreciation charge	(1,035)	(147,128)	(2,495)	-	(150,658)
Carrying amount at December 31, 2024	4,609	756,442	8,144	-	769,195

As at December 31, 2025, the interest expense on lease liabilities was RON 15,680 thousand for the Group (2024: RON 12,267 thousand) and RON 15,610 thousand for the Bank (2024: RON 14,782 thousand).

The maturity analysis of the lease liabilities is presented in Note 4c.

At Group level as well as at Bank level, expenses related to short-term leases and leases of low-value assets, that are not shown as short-term leases, are included in "Other operating expenses" as shown below:

<i>In RON thousand</i>	Group		Bank	
	December 31, 2025	December 31, 2024	December 31, 2025	December 31, 2024
Expense relating to short-term leases	5,330	859	3,923	624
Expense relating to leases of low-value assets that are not shown above as short-term leases	9,480	6,456	6,022	5,387

Total cash outflow for leases in 2025 was at the Group level of RON 174,235 thousand (2024: RON 177,010 thousand) and at the Bank level RON 160,958 thousand (2024: RON 173,447 thousand).

Notes to the consolidated and separate financial statements

29. Deferred tax assets and liabilities

Deferred tax assets/liabilities at Group level, as at December 31, 2025:

<i>In RON thousand</i>	December 31, 2024	Business combination	Recognized in profit or loss	Recognized in other items of comprehensive income	Recognized directly in shareholders' equity	December 31, 2025
Tax effect of temporary deductible/(taxable) differences (including tax losses carried forward), resulting from:						
Financial assets from interbank operations	-	584	-	-	1	585
Loans and receivables	27,317	(1,310)	10,508	-	(27,423)	9,092
Financial assets measured at fair value through other items of comprehensive income	347,629	(3,224)	(103)	(212,201)	6,141	138,242
Financial assets at amortized cost	15,320	-	(357)	-	(14,951)	12
Financial assets at fair value through profit or loss	43,370	-	32,799	-	-	76,169
Other assets	17,995	94	(8,817)	(349)	250	9,173
Property and equipment and intangible assets	(45,100)	(12,323)	(1,605)	(1,297)	10,069	(50,256)
Right of Use Assets	743	(549)	3,516	-	(1)	3,709
Provisions and other liabilities	54,965	9,703	(25,043)	-	(2,821)	36,804
Tax losses carried forward	-	-	-	-	-	-
Deferred tax asset / (liability)	462,239	(7,025)	10,898	(213,847)	(28,735)	223,530
Recognition of deferred tax asset	531,471	(10,625)	19,423	(199,745)	(36,898)	303,626
Recognition of deferred tax liability	(69,232)	3,600	(8,525)	(14,102)	8,163	(80,096)
Deferred tax asset / (liability)	462,239	(7,025)	10,898	(213,847)	(28,735)	223,530

Notes to the consolidated and separate financial statements

29. Deferred tax assets and liabilities (*continued*)

Deferred tax assets/liabilities at Group level, as at December 31, 2024:

<i>In RON thousand</i>	December 31, 2023	Business combination	Recognized in profit or loss	Recognized in other items of comprehensive income	Recognized directly in shareholders' equity	December 31, 2024
Tax effect of temporary deductible/(taxable) differences (including tax losses carried forward), resulting from:						
Financial assets from interbank operations	-	(327)	162	-	165	-
Loans and receivables	6,211	12,388	8,718	-	-	27,317
Financial assets measured at fair value through other items of comprehensive income	312,109	(1,962)	(990)	38,519	(47)	347,629
Financial assets at amortized cost	2,733	(440)	(4,025)	-	17,052	15,320
Financial assets at fair value through profit or loss	22,196	-	21,174	-	-	43,370
Other assets	6,503	1,030	10,587	(138)	13	17,995
Property and equipment and intangible assets	(17,850)	(30,167)	(1,002)	(1,369)	5,288	(45,100)
Right of Use Assets	(676)	(205)	1,624	-	-	743
Provisions and other liabilities	23,255	11,822	19,884	-	4	54,965
Tax losses carried forward	-	162	(162)	-	-	-
Deferred tax asset / (liability)	354,481	(7,699)	55,970	37,012	22,475	462,239
Recognition of deferred tax asset	383,232	24,853	104,716	1,500	17,170	531,471
Recognition of deferred tax liability	(28,751)	(32,552)	(48,746)	35,512	5,305	(69,232)
Deferred tax asset / (liability)	354,481	(7,699)	55,970	37,012	22,475	462,239

Notes to the consolidated and separate financial statements

29. Deferred tax assets and liabilities (continued)

Deferred tax assets/liabilities at Bank level, as at December 31, 2025:

<i>In RON thousand</i>	December 31, 2024	Business combination	Recognized in profit or loss	Recognized in other items of comprehensive income	Recognized directly in shareholders' equity	December 31, 2025
Tax effect of temporary deductible/(taxable) differences (including tax losses carried forward), resulting from:						
Financial assets measured at fair value through other items of comprehensive income	353,185	(3,224)	-	(197,582)	3,225	155,604
Other assets	18,299	-	(8,829)	231	-	9,701
Property and equipment and intangible assets	(5,299)	(7,043)	3,704	(1,297)	(40)	(9,975)
Right of Use Assets	-	-	-	-	-	-
Provisions and other liabilities	22,092	9,005	(4,306)	-	6,055	32,846
Deferred tax asset / (liability)	388,277	(1,262)	(9,431)	(198,648)	9,240	188,176
Recognition of deferred tax asset	395,529	(10,267)	15,377	(198,879)	1,209	202,969
Recognition of deferred tax liability	(7,252)	9,005	(24,808)	231	8,031	(14,793)
Deferred tax asset / (liability)	388,277	(1,262)	(9,431)	(198,648)	9,240	188,176

Deferred tax assets/liabilities at Bank level, as at December 31, 2024:

<i>In RON thousand</i>	December 31, 2023	Recognized in profit or loss	Recognized in other items of comprehensive income	Recognized directly in shareholders' equity	December 31, 2024
Tax effect of temporary deductible/(taxable) differences (including tax losses carried forward), resulting from:					
Financial assets measured at fair value through other items of comprehensive income	313,470	-	39,715	-	353,185
Other assets	11,683	6,618	(2)	-	18,299
Property and equipment and intangible assets	(4,616)	686	(1,369)	-	(5,299)
Right of Use Assets	(644)	644	-	-	-
Provisions and other liabilities	17,389	4,703	-	-	22,092
Deferred tax asset / (liability)	337,282	12,651	38,344	-	388,277
Recognition of deferred tax asset	344,282	51,488	(241)	-	395,529
Recognition of deferred tax liability	(7,000)	(38,837)	38,585	-	(7,252)
Deferred tax asset / (liability)	337,282	12,651	38,344	-	388,277

Notes to the consolidated and separate financial statements

30. Other financial assets

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Amounts under settlement	705,854	951,326	648,894	858,008
Non-recourse factoring	717,915	664,941	717,915	646,520
Sundry debtors and advances for non-current assets	578,604	680,265	402,222	469,911
Cheques and other instruments to be encashed	63,291	78,001	63,291	57,170
Other financial assets	70,906	98,771	67,313	58,024
Impairment allowance for other financial assets	(116,758)	(145,937)	(73,569)	(76,555)
Total	2,019,812	2,327,367	1,826,066	2,013,078

As at December 31, 2025, out of RON 2,019,812 thousand (2024: RON 2,327,367 thousand), the Group's other impaired financial assets amounted to RON 100,806 thousand (2024: RON 132,247 thousand).

As at December 31, 2025, out of RON 1,826,066 thousand (2024: RON 2,013,078 thousand), the Bank's other impaired financial assets amounted to RON 53,246 thousand (2024: RON 53,109 thousand).

The evolution of impairment allowance for other assets during the years 2025 and 2024 is presented below:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Balance as at January 1	(145,937)	(58,150)	(76,555)	(22,022)
Net impairment charge	(3,417)	(70,014)	3,015	(54,749)
Impairment allowance from acquisition	-	(32,937)	-	-
Transfer from loans	-	(2,361)	-	-
Provisions related to credits transferred off-balance sheet	25,497	9,553	-	-
Other changes (exchange rate differences, unwinding, deconsolidation)	7,099	7,972	(29)	216
Balance as at December 31	(116,758)	(145,937)	(73,569)	(76,555)

The quality analysis of other financial assets held by the Group as at December 31, 2025 is detailed below:

Group <i>In RON thousand</i>	Retail			Non-Retail		
	RON	FCY	Total	RON	FCY	Total
December 31, 2025						
Amounts under settlement	7,109	16,187	23,296	648,175	34,383	682,558
Non-recourse factoring	-	-	-	674,398	43,517	717,915
Sundry debtors and advances for non-current assets	24,751	4,673	29,424	385,550	163,630	549,180
Cheques and other instruments to be encashed	-	-	-	63,291	-	63,291
Other financial assets	3,142	1,433	4,575	24,992	41,339	66,331
Impairment allowance for other financial assets	(7,567)	(2,727)	(10,294)	(102,676)	(3,788)	(106,464)
Total	27,435	19,566	47,001	1,693,730	279,081	1,972,811

The quality analysis of other financial assets held by the Group as at December 31, 2024 is detailed below:

Group <i>In RON thousand</i>	Retail			Non-Retail		
	RON	FCY	Total	RON	FCY	Total
December 31, 2024						
Amounts under settlement	14,479	22,175	36,654	870,644	44,028	914,672
Non-recourse factoring	-	-	-	594,985	69,956	664,941
Sundry debtors and advances for non-current assets	47,944	5,159	53,103	366,169	260,993	627,162
Cheques and other instruments to be encashed	-	-	-	78,001	-	78,001
Other financial assets	3,954	1,391	5,345	62,547	30,879	93,426
Impairment allowance for other financial assets	(10,360)	(3,124)	(13,484)	(95,308)	(37,145)	(132,453)
Total	56,017	25,601	81,618	1,877,038	368,711	2,245,749

Notes to the consolidated and separate financial statements

30. Other financial assets (continued)

The quality analysis of other financial assets held by the Bank as at December 31, 2025 is detailed below:

Bank	Retail			Non-Retail		
<i>In RON thousand</i>						
December 31, 2025	RON	FCY	Total	RON	FCY	Total
Amounts under settlement	3,955	-	3,955	624,262	20,677	644,939
Non-recourse factoring	-	-	-	674,398	43,517	717,915
Sundry debtors and advances for non-current assets	14,917	2,032	16,949	254,174	131,099	385,273
Cheques and other instruments to be encashed	-	-	-	63,291	-	63,291
Other financial assets	-	-	-	27,065	40,248	67,313
Impairment allowance for other financial assets	(2,028)	(37)	(2,065)	(69,317)	(2,187)	(71,504)
Total	16,844	1,995	18,839	1,573,873	233,354	1,807,227

The quality analysis of other financial assets held by the Bank as at December 31, 2024 is detailed below:

Bank	Retail			Non-Retail		
<i>In RON thousand</i>						
December 31, 2024	RON	FCY	Total	RON	FCY	Total
Amounts under settlement	3,022	1,244	4,266	825,335	28,407	853,742
Non-recourse factoring	-	-	-	577,676	68,844	646,520
Sundry debtors and advances for non-current assets	36,033	2,197	38,230	283,677	148,004	431,681
Cheques and other instruments to be encashed	-	-	-	57,170	-	57,170
Other financial assets	-	-	-	29,642	28,382	58,024
Impairment allowance for other financial assets	(1,882)	(38)	(1,920)	(71,840)	(2,795)	(74,635)
Total	37,173	3,403	40,576	1,701,660	270,842	1,972,502

31. Other non-financial assets

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Inventories and similar assets	135,545	154,960	84,962	69,569
Prepaid expenses	226,579	174,416	135,212	136,579
VAT and other taxes to be received	3,139	3,224	1,574	1,496
Other non-financial assets	95,168	90,344	59,835	43,131
Impairment allowance for other non-financial assets	(14,189)	(17,700)	(4,696)	(6,661)
Total	446,242	405,244	276,887	244,114

The evolution of impairment allowance for other assets during the year is presented below:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Balance as at January 1	(17,700)	(15,839)	(6,661)	(8,096)
Net impairment charge	1,755	(1,691)	3,387	1,435
Impairment allowance from acquisition	(1,422)	(2,089)	(1,422)	-
Impairment allowances on written off other non-financial assets	-	1,371	-	-
Other adjustments (exchange rate differences, deconsolidation)	3,178	548	-	-
Balance as at December 31	(14,189)	(17,700)	(4,696)	(6,661)

The inventories and related items of the Group, during financial year 2025, include purchased assets held for sale amounting to RON 1,607 thousand, structured as follows: buildings RON 0 thousand, lands RON 0 thousand, equipment RON 593 thousand, vehicles RON 1,014 thousand and furniture RON 0 thousand (2024: RON 41,839 thousand, structured as follows: buildings RON 34,616 thousand, lands RON 0 thousand, equipment RON 6,960 thousand, vehicles RON 263 thousand and furniture RON 0 thousand). The inventories and related items of the Group and the Bank, during financial year 2025, include assets acquired by debt enforcement or given in payment, at a net value of RON 45,406 thousand, structured as follows: buildings RON 8,446 thousand, lands RON 9,710 thousand, equipment RON 9,507 thousand, vehicles RON 17,743 thousand and furniture RON 0 thousand (2024: RON 44,704 thousand, structured as follows: buildings RON 17,003 thousand, lands RON 7,678 thousand, equipment RON 6,096 thousand, vehicles RON 13,926 thousand and furniture RON 0 thousand).

Notes to the consolidated and separate financial statements

31. Other non-financial assets (continued)

The inventories and related items of the Group and the Bank, during financial year 2025, include tangible assets reclassified as non-current assets held for sale, at a net value of RON 17,582 thousand structured as equipment RON 0 thousand, vehicles RON 0 thousand and buildings RON 17,582 thousand (2024: RON 31,097 thousand structured as equipment RON 0 thousand, vehicles RON 0 thousand and buildings RON 31,097 thousand).

32. Deposits from banks

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Sight demand	253,105	688,183	269,390	662,005
Term deposits	48,742	262,972	51,663	511,773
Total	301,847	951,155	321,053	1,173,778

33. Deposits from customers

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Current accounts	82,756,084	80,616,609	79,224,677	73,448,427
Sight demand	1,022,087	1,490,483	973,569	1,045,586
Term deposits	90,226,447	84,417,244	87,454,804	75,233,217
Collateral deposits	1,245,192	1,344,930	1,208,677	1,058,024
Total	175,249,810	167,869,266	168,861,727	150,785,254

Deposits from customers can be also analyzed as follows:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Retail	115,946,892	108,514,223	110,945,044	98,028,750
Companies	59,302,918	59,355,043	57,916,683	52,756,504
Total	175,249,810	167,869,266	168,861,727	150,785,254

The table below presents the deposits from customers, split by economic sector concentration:

Sector	Group		Bank	
	2025	2024 (*)	2025	2024 (*)
Retail	66.16%	64.64%	65.70%	65.00%
Services	6.42%	6.79%	6.39%	6.77%
Trading	4.72%	5.55%	4.55%	5.51%
Financial Institutions and Insurance Companies	3.75%	2.99%	4.44%	3.62%
Constructions	3.97%	3.57%	4.05%	3.63%
Others	2.77%	2.72%	2.73%	2.06%
Manufacturing	2.86%	3.33%	2.85%	3.24%
Real Estate	1.77%	1.77%	1.75%	1.62%
Self-employed	1.35%	1.39%	1.37%	1.46%
Transportation	1.49%	2.14%	1.42%	2.23%
Health and social welfare services	1.18%	1.24%	1.17%	1.29%
Agriculture and Forestry	1.06%	1.06%	1.09%	1.07%
Education	0.85%	0.87%	0.85%	0.84%
Energy Industry	0.69%	1.25%	0.67%	1.11%
Extractive Industry	0.60%	0.34%	0.61%	0.23%
Telecommunications	0.18%	0.17%	0.18%	0.14%
Government Bodies	0.10%	0.08%	0.10%	0.08%
Chemical Industry	0.07%	0.08%	0.07%	0.08%
Fishing	0.01%	0.02%	0.01%	0.02%
Total	100%	100%	100%	100%

(*) To ensure comparability of classification by economic sectors, the data presented as of December 31, 2024, have been restated in accordance with the new version of the National Economy Activity Classification CAEN Rev. 3 (see note 2e(b)).

Notes to the consolidated and separate financial statements

33. Deposits from customers (continued)

<i>In RON thousand</i>	Group		Bank	
Sector	2025	2024 (*)	2025	2024 (*)
Retail	115,946,892	108,514,223	110,945,044	98,028,750
Services	11,242,743	11,398,955	10,815,838	10,211,109
Trading	8,273,322	9,324,468	7,677,170	8,301,872
Financial Institutions and Insurance Companies	6,568,503	5,011,710	7,502,737	5,451,396
Constructions	6,958,500	5,995,955	6,830,903	5,478,047
Others	4,846,567	4,574,188	4,606,335	3,111,490
Manufacturing	5,013,362	5,592,134	4,814,835	4,890,714
Real Estate	3,095,245	2,966,698	2,962,677	2,438,391
Self-employed	2,368,661	2,331,369	2,305,148	2,199,305
Transportation	2,626,439	3,589,395	2,391,329	3,357,343
Health and social welfare services	2,066,948	2,085,574	1,969,983	1,947,929
Agriculture and Forestry	1,857,967	1,781,171	1,840,733	1,607,301
Education	1,500,426	1,455,687	1,439,112	1,270,101
Energy Industry	1,203,111	2,099,043	1,133,930	1,677,962
Extractive Industry	1,043,890	567,514	1,021,865	345,666
Telecommunications	316,722	293,251	296,088	207,585
Government Bodies	168,045	131,891	165,920	121,399
Chemical Industry	131,738	129,297	121,360	114,635
Fishing	20,729	26,743	20,720	24,259
Total	175,249,810	167,869,266	168,861,727	150,785,254

(*) To ensure comparability of classification by economic sectors, the data presented as of December 31, 2024, have been restated in accordance with the new version of the National Economy Activity Classification CAEN Rev. 3 (see note 2e(b)).

34. Loans from banks and other financial institutions

	Group		Bank	
<i>In RON thousand</i>	2025	2024	2025	2024
Loans from public administrations	57,455	27,703	-	-
Loans from commercial banks	648,154	686,506	-	-
<i>Romanian banks</i>	381,885	686,506	-	-
<i>Foreign banks</i>	266,269	-	-	-
Loans from development banks	1,027,187	939,485	772,367	900,339
Repurchase agreements (repo transactions)	2,222,261	201,226	1,860,645	162,529
Other funds from financial institutions	1,192,247	144,069	2,126	2,531
Issued bonds	11,975,497	10,238,727	11,969,201	10,144,092
Total	17,122,801	12,237,716	14,604,339	11,209,491

The interest rates for the loans from banks and financial institutions were situated in the following ranges:

	2025		2024	
	Minimum	Maximum	Minimum	Maximum
EUR	0.15%	8.88%	0.15%	8.88%
RON	0.00%	5.70%	4.60%	Robor 3m+3.3%
USD	5.60%	8.21%	N/A	N/A
MDL	1.60%	9.91%	3.00%	6.37%

The Group and the Bank were in compliance with all financial covenants under the outstanding loan agreements at December 31, 2025 and at December 31, 2024. Due to the acquisition of OTP entities in Romania during 2024, the Bank requested and obtained, before December 31, 2024, waivers for those financial covenants that were exceeded solely due to the acquisition. Such cases are deemed to be of a temporary nature, until the merger date by absorption of OTP Bank Romania S.A. into Banca Transilvania S.A.. As of December 31, 2025, the Group and the Bank fell within the limits of the indicators imposed by the financiers.

Notes to the consolidated and separate financial statements

34. Loans from banks and other financial institutions (continued)

The table below summarizes the underlying securities of repo agreements:

In RON thousand

	Group		2024	
	2025	2024	2025	2024
	Carrying amount	Carrying amount	Carrying amount	Carrying amount
	Transferred assets	Related liabilities	Transferred assets	Related liabilities
Financial assets measured at fair value through other items of comprehensive income	1,161,753	1,060,247	162,603	162,529
Financial assets at amortized cost	1,199,101	1,162,014	38,872	38,697
Total	2,360,854	2,222,261	201,475	201,226

In RON thousand

	Bank		2024	
	2025	2024	2025	2024
	Carrying amount	Carrying amount	Carrying amount	Carrying amount
	Transferred assets	Related liabilities	Transferred assets	Related liabilities
Financial assets measured at fair value through other items of comprehensive income	1,161,753	1,060,247	162,603	162,529
Financial assets at amortized cost	834,792	800,398	-	-
Total	1,996,545	1,860,645	162,603	162,529

35. Subordinated liabilities

The Group and the Bank were in compliance with all financial covenants under the outstanding loan agreements at December 31, 2025 and at December 31, 2024. Due to the acquisition of OTP entities in Romania during 2024, the Bank requested and obtained, before December 31, 2024, waivers for those financial covenants that were exceeded solely due to the acquisition. Such cases are deemed to be of a temporary nature, until the merger date by absorption of OTP Bank Romania S.A. into Banca Transilvania S.A.. As of December 31, 2025, the Group and the Bank fell within the limits of the indicators imposed by the financiers.

In RON thousand

	Group		Bank	
	2025	2024	2025	2024
Loans from development banks and financial institutions	175,193	122,959	-	-
Non-convertible bonds	2,468,084	2,407,576	2,466,250	2,405,137
Total	2,643,277	2,530,535	2,466,250	2,405,137

Subordinated debt includes subordinated loans from development banks and financial institutions, as well as non-convertible bonds.

Subordinated loans include the following:

-loan in the amount of MDL 289 million, equivalent of RON 74,491 thousand, contracted in 2024 bearing an interest of IRCC6M_MD L +6.5%, due in 2031;

-loan in the amount of MDL 192 million, equivalent of RON 49,521 thousand, contracted in 2024 bearing an interest of IRCC6M_MD L +6.25%, due in 2031;

-loan in the amount of MDL 197 million, equivalent of RON 50,702 thousand, contracted in 2025 bearing an interest of IRCC6M_MD L +6.5%, due in 2035;

In 2018, Banca Transilvania S.A. issued non-convertible bonds amounting to EUR 285 million, equivalent as at December 31, 2025 to RON 1,453,073 thousand (2024: RON 1,417,619 thousand), bearing an interest of 6M EURIBOR+3.75% p.a. and due in 2028. The nominal value of a bond is EUR 100,000.

In 2023, Banca Transilvania S.A. issued non-convertible bonds amounting to EUR 200 million, equivalent as at December 31, 2025 to RON 1,019,700 thousand (2024: RON 994,820 thousand), bearing an interest of 6M EURIBOR+6.68% p.a. and due in 2033. The nominal value of a bond is EUR 100,000.

At Group level, the accrued interest and amortization on subordinated debts is in amount of RON 477 thousand (2024: RON (862) thousand) and at Bank level in amount of RON 0 thousand (2024: RON 0 thousand); for the non-convertible bonds, the accrued interest and amortization for the Group levels to RON (4,688) thousand (2024: RON (4,862) thousand) and for the Bank to RON (6,522) thousand (2024: RON (7,302) thousand).

Notes to the consolidated and separate financial statements

36. Provisions for other risks and loan commitments

The following items are included under Provisions for other risks and loan commitments:

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Provisions for loan commitments, financial guarantees and other commitments given	448,372	416,485	414,780	346,802
Provisions for untaken holidays	48,742	49,521	32,988	29,094
Provisions for other employee benefits	112,134	232,768	58,436	78,523
Provisions for litigations, risks and charges (*)	227,875	128,664	133,341	45,693
Total	837,123	827,438	639,545	500,112

(*) Provisions for risks and charges primarily include provisions for litigation and other risks taken after the merger with Volksbank Romania S.A., Bancpost S.A. and OTP Bank Romania S.A..

37. Other financial liabilities

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Amounts under settlement	2,774,144	3,159,476	1,574,454	2,238,406
Sundry creditors	531,081	483,664	396,645	263,358
Dividends payable	44,452	35,090	44,406	35,052
Other financial liabilities	97,027	89,480	68,854	46,075
Total	3,446,704	3,767,710	2,084,359	2,582,891

38. Other non-financial liabilities

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Other taxes payable	355,365	191,980	328,334	144,639
Other non-financial liabilities	119,918	120,993	66,362	76,024
Total	475,283	312,973	394,696	220,663

39. Share capital

The statutory share capital of the Bank at December 31, 2025, as recorded with the Trade Register was represented by 1,090,322,225 ordinary shares with a nominal value of RON 10 each (at December 31, 2024: 916,879,846 shares with a nominal value of RON 10 each). The shareholders structure of the Bank is presented in Note 1.

The capital increase was made out by incorporating the reserves from the statutory profit in amount of RON 1,734,423,790 (2024: RON 1,182,216,130 by incorporating the reserves constituted from the statutory profit).

<i>In RON thousand</i>	Group		Bank	
	2025	2024	2025	2024
Paid share capital recorded to Trade Register	10,903,223	9,168,799	10,903,223	9,168,799
Share capital adjustment to inflation	89,899	89,899	89,899	89,899
Share capital adjustment with unrealized revaluation reserves of tangible assets	(3,398)	(3,398)	(3,398)	(3,398)
Total	10,989,724	9,255,300	10,989,724	9,255,300

Banca Transilvania S.A. issued additional level 1 bonds (AT1 bonds) in November 2025, with a volume of EUR 500 million. AT1 bonds are unsecured and subordinated bonds, are perpetual and can only be cancelled by the issuer on predetermined dates. AT1 bonds include discretionary non-cumulative coupon payments, which allows them to be classified as equity in accordance with IFRS.

If the Group or Bank's CET 1 falls below 5.125% (i.e. if a triggering event occurs), the principal amount will be reduced. The issuer may, at its discretion, increase the amount (in whole or in part), compliance with certain conditions, including recording a positive result and fixing the triggering event.

Notes to the consolidated and separate financial statements

40. Related-party transactions

Entities are considered to be related parties if one of them has the capacity to control the other or to exercise significant influence on the other entity's management process related to financial or operational decisions.

The Group and the Bank are engaged in transactions with related parties, shareholders and key management personnel. All these transactions were carried out under conditions similar to those applicable to third party agreements, in terms of interest rates and collateral clauses. The transactions /balances with subsidiary entities were eliminated from the scope of consolidation, except from excluded subsidiaries from the consolidation perimeter as presented in Note 1.

Transactions with other related parties include transactions with the major shareholders, family members of the key management personnel and companies where they are shareholders while having a relationship with the Bank.

The transactions / balances with related parties are presented below:

<i>Group - In RON thousand</i>	2025				2024			
	Unconsolidated subsidiaries	Key management personnel	Other related-parties	Total	Unconsolidated subsidiaries	Key management personnel	Other related-parties	Total
Assets								
Granted loans	-	25,131	195,340	220,471	-	12,204	68,530	80,734
Equity investments	20,108	-	-	20,108	962	-	-	962
Other assets	-	-	-	-	430	-	-	430
Liabilities								
Deposits from customers	23,630	81,320	1,112,999	1,217,949	34,508	49,054	389,331	472,893
Loans from credit institutions	-	-	46,091	46,091	-	-	35,594	35,594
Debt securities	-	-	517,962	517,962	-	-	502,234	502,234
Other liabilities	35	-	-	35	12,785	-	-	12,785
Commitments								
Loan commitments and financial guarantees given	823	3,108	33,491	37,422	-	1,997	28,446	30,443
Notional value of exchange operations	1,155	63,257	470,556	534,968	-	55,688	154,779	210,467
Statement of profit or loss								
Interest income	-	1,180	11,491	12,671	2	672	4,678	5,352
Interest expense	934	1,479	72,234	74,647	480	1,424	79,320	81,224
Fee and commission income	6	12	254	272	7	15	286	308
Other income	1,874	-	-	1,874	1,393	-	-	1,393
Other expenses	1,701	-	-	1,701	770	-	-	770

Notes to the consolidated and separate financial statements

40. Related-party transactions (*continued*)

Bank – In RON thousand

	2025				2024			
	Subsidiaries	Key management personnel	Other related-parties	Total	Subsidiaries	Key management personnel	Other related-parties	Total
Assets								
Correspondent accounts at credit institutions	171	-	-	171	48	-	-	48
Deposits with credit institutions	-	-	-	-	714,134	-	-	714,134
Granted loans	7,145,203	13,927	194,806	7,353,936	7,217,556	8,955	67,730	7,294,241
Equity investments	1,353,356	-	-	1,353,356	2,643,741	-	-	2,643,741
Derivatives	5,038	-	-	5,038	-	-	-	-
Financial assets measured at fair value through other items of comprehensive income – debt instruments	1,745	-	-	1,745	1,645	-	-	1,645
Financial assets required to be measured at fair value through profit or loss - debt instruments	952,888	-	-	952,888	623,234	-	-	623,234
Right of use assets	16,806	-	-	16,806	237,453	-	-	237,453
Other assets	11,946	-	-	11,946	15,103	-	-	15,103
Liabilities								
Correspondent accounts from credit institutions	6,779	-	-	6,779	4,547	-	-	4,547
Deposits from customers	1,088,593	56,169	1,109,015	2,253,777	1,175,076	33,409	383,683	1,592,168
Debt securities	-	-	509,832	509,832	-	-	497,214	497,214
Lease liabilities	18,461	-	-	18,461	193,497	-	-	193,497
Other liabilities	5,283	-	-	5,283	4,633	-	-	4,633
Commitments								
Loan commitments and financial guarantees given	994,002	1,148	33,402	1,028,552	577,640	1,580	28,352	607,572
Notional value of exchange operations	1,079,739	43,588	469,321	1,592,648	1,490,764	32,914	150,655	1,674,333

Notes to the consolidated and separate financial statements

40. Related-party transactions (*continued*)

Bank – In RON thousand

	2025				2024			
	Subsidiaries	Key management personnel	Other related-parties	Total	Subsidiaries	Key management personnel	Other related-parties	Total
Statement of profit or loss								
Interest income	323,503	577	11,447	335,527	366,992	482	4,622	372,096
Interest expense	33,951	778	70,447	105,176	21,443	861	76,345	98,649
Fee and commission income	15,902	6	244	16,152	7,469	10	270	7,749
Fee and commission expense	26,284	-	-	26,284	18,390	-	-	18,390
Net gain/loss (-) from financial assets and liabilities held-for-trading	2,613	-	-	2,613	-	-	-	-
Net gain/loss (-) from financial assets required to be measured at fair value through profit or loss	202,496	-	-	202,496	-	-	-	-
Dividend income	68,300	-	-	68,300	16,429	-	-	16,429
Bargain gain	1,213	-	-	1,213	677,476	-	-	677,476
Other income	57,981	-	-	57,981	48,955	-	-	48,955
Other expenses	9,296	-	-	9,296	32,833	-	-	32,833

Notes to the consolidated and separate financial statements

40. Related-party transactions (*continued*)

Transactions with key management personnel

During 2025, the expenses related to the fixed and variable cash remunerations of the members of the Board of Directors and of the Executive Management of the Group amounted to RON 63,649 thousand (2024: RON 60,180 thousand) and of the Bank amounted to RON 22,901 thousand (2024: RON 22,969 thousand).

Key management personnel at the Group level include: members of the Board of Directors (including the Bank's middle management, who are members of the Boards of Directors of the subsidiaries); members of all the Bank's committees, the Executive Management of the Bank and its subsidiaries and certain members of the Bank's middle management who have a significant impact on the Group's risk profile, according to Delegated Regulation (EU) 923/2021.

Compensation for the key personnel of the Group:

	2025			2024		
		of which social security contributions	of which employer contributions to the 3rd Pension Pillar		of which social security contributions	of which employer contributions to the 3rd Pension Pillar
<i>In RON thousand</i>	Total			Total		
Short-term employee benefits	114,788	27,462	67	95,351	22,778	56
Termination benefits	4,582	1,145	-	1,077	269	-
Share based payments	62,513	336	-	39,877	323	-
Debt instrument-based payments	401	100	-	145	36	-
Total compensations and benefits	182,284	29,043	67	136,450	23,406	56

Compensation for the key personnel of the Bank:

	2025			2024		
		of which social security contributions	of which employer contributions to the 3rd Pension Pillar		of which social security contributions	of which employer contributions to the 3rd Pension Pillar
<i>In RON thousand</i>	Total			Total		
Short-term employee benefits	56,195	13,466	65	46,025	10,986	50
Termination benefits	540	135	-	123	31	-
Share based payments	54,884	-	-	34,041	-	-
Total compensations and benefits	111,619	13,601	65	80,189	11,017	50

41. Commitments and contingencies

a) Commitments and contingencies

At any time, the Group and the Bank have outstanding commitments to extend loans. These commitments are in the form of approved limits for credit cards and overdraft facilities. Outstanding loan commitments have a commitment period that does not extend beyond the normal underwriting and settlement period of one month to one year.

The Group and the Bank provide financial guarantees and letters of credit to guarantee the performance of its customers in relation to third parties. These agreements have fixed limits and generally extend for a period of up to one year. Maturities are not concentrated in a specific period.

The contractual amounts of commitments and contingencies are set out in the following table by categories. The amounts reflected in the table under commitments are presented based on the assumption that they have been fully granted.

Notes to the consolidated and separate financial statements

41. Commitments and contingencies (continued)

a) Commitments and contingencies (continued)

The amounts reflected in the table as guarantees and letters of credit represent the maximum accounting loss that would be recognized at the reporting date if counterparties completely failed to meet the contractual terms and conditions.

	Group		Bank	
<i>In RON thousand</i>	2025	2024	2025	2024
Guarantees issued, of which	5,157,952	4,225,114	5,074,911	3,468,916
- <i>Performance guarantees</i>	505,285	1,088,832	462,372	657,882
- <i>Financial guarantees</i>	4,652,667	3,136,282	4,612,539	2,811,034
Loan commitments	30,089,245	28,335,877	30,037,717	26,265,158
Total	35,247,197	32,560,991	35,112,628	29,734,074

The provisions for loan commitments to customers amounted to RON 448,372 thousand at Group level (2024: RON 416,485 thousand) and at Bank level RON 414,780 thousand (2024: RON 346,802 thousand). Forward agreements represent contractual arrangements to buy or sell a certain financial instrument, at a certain price and at a certain future date.

Outstanding foreign currency transactions at December 31, 2025 were:

Transactions with corporate clients:

Purchases	5,710,000	EUR	equivalent	29,516,001	RON
Purchases	484,981	EUR	equivalent	573,200	USD
Purchases	14,095,000	USD	equivalent	63,449,191	RON
Purchases	154,181	RON	equivalent	30,000	EUR
Purchases	3,281,535	RON	equivalent	745,000	USD

Transactions with banks:

Purchases	15,358,435	EUR	equivalent	14,159,932	CHF
Purchases	26,212,952	EUR	equivalent	111,000,000	PLN
Purchases	3,765,000	EUR	equivalent	20,059,163	RON
Purchases	12,369,990	EUR	equivalent	20,000,000	CAD
Purchases	6,200,000	EUR	equivalent	2,404,983,350	HUF
Purchases	445,000	USD	equivalent	1,989,113	RON
Purchases	1,992,055,314	RON	equivalent	389,035,178	EUR
Purchases	61,294,004	RON	equivalent	13,485,000	USD
Purchases	10,954,032	RON	equivalent	2,000,000	CHF
Purchases	8,637,511	RON	equivalent	660,000,000	HUF
Purchases	40,000,000	CAD	equivalent	24,733,711	EUR
Purchases	573,764	USD	equivalent	484,802	EUR
Purchases	10,116,952,960	HUF	equivalent	26,152,419	EUR

Outstanding foreign currency transactions at December 31, 2024 were:

Transactions with corporate clients:

Purchases	3,590,000	EUR	equivalent	18,046,531	RON
Purchases	17,650,000	USD	equivalent	81,769,801	RON
Purchases	476,567	RON	equivalent	95,000	EUR

Transactions with banks:

Purchases	10,715,465	EUR	equivalent	10,000,000	CHF
Purchases	24,091,321	EUR	equivalent	105,000,000	PLN
Purchases	8,000,000	EUR	equivalent	40,240,852	RON
Purchases	37,355,248	EUR	equivalent	40,000,000	USD
Purchases	3,111,710,135	RON	equivalent	613,357,631	EUR
Purchases	80,489,947	RON	equivalent	17,325,000	USD
Purchases	40,000,000	USD	equivalent	37,347,562	EUR

Notes to the consolidated and separate financial statements

41. Commitments and contingencies (*continued*)

b) Transfer pricing and taxation

The taxation system in Romania has faced multiple changes in the recent years and is in a continuous process of update and improvement. As a consequence, the tax legislation is still subject to various interpretations. In certain cases, the tax authorities may treat certain issues in a different manner, determining the calculation of additional taxes, interest and penalties for delay (the total current rate is of 0.03% per day of delay). In Romania, the fiscal year remains open for fiscal audit for 5 years. According to the Bank's management, the tax duties included in these financial statements are appropriate.

The tax legislation in Romania considers the "market value" principle, according to which transactions between related parties must be performed at market value.

The taxpayers involved in related-party transactions must prepare and provide to the Romanian tax authorities the transfer pricing file, upon request. The failure to provide the transfer pricing file or the submission of an incomplete transfer pricing file may lead to penalties for non-compliance; apart from the transfer pricing file, the tax authorities may interpret transactions and circumstances in a manner which is different from the management's interpretation and, consequently, may impose additional tax duties resulting from the adjustment of transfer prices.

The management of the Group and of the Bank considers that no losses should be incurred in the event of a fiscal audit for the verification of transfer prices. However, the impact of potential different interpretations of the tax authorities cannot be accurately estimated. However, the fiscal risk is low because the majority of transactions are between group entities, which are in Romania, without cross-border risk.

c) Other contingent liabilities

As a result of the merger of 28.02.2025, OTP Bank Romania S.A., Banca Transilvania S.A. took over the legal standing in the litigation against the report issued by National Authority for Consumer Protection ("ANPC") in which it was found, in essence, that the consumer protection legislation regarding some loans granted between 2004 and 2010 was not complied with, as regards:

- informing consumers about how to calculate the variable interest rate;
- the contractual clause regarding the administration fee;
- informing consumers about the currency risk of loans in Swiss francs.

OTP Bank Romania S.A. judicially challenged the report issued by ANPC, and its effects, including the application of the sanctions established by ANPC, were suspended, under the law, until the final judgment of the dispute. In 2025, the court admitted our action in its entirety in the first instance. The decision has not yet been communicated. ANPC declared an appeal that is under trial.

In September 2024, Banca Transilvania S.A. received a report from the National Authority for Consumer Protection ("ANPC") in which it was found, in essence, that the consumer protection legislation regarding some loans granted between 2004 and 2010 was not complied with, regarding the implementation of the provisions of GEO no. 50/2010 for loans that had a fixed margin in the composition of the interest. ANPC considered that the upward change in the interest margin for the application of PUG no. 50/2010, for some of these loans, was not legal. Banca Transilvania S.A. has judicially challenged the report issued by ANPC, there are solid arguments for the annulment of this report, and its effect, including the application of sanctions established by ANPC, has been suspended, under the law, until the final judgment of the dispute.

Notes to the consolidated and separate financial statements

41. Commitments and contingencies (continued)

c) Other contingent liabilities (continued)

Based on the assessment carried out by the management, supported by internal legal analyses and external legal opinions, disputes with the National Authority for Consumer Protection (ANPC) do not meet the criteria for recognizing a provision, as an outflow of economic resources is not considered probable at the reporting date.

In both cases, the effects of the minutes issued by the ANPC, including the application of sanctions, were suspended according to the law until the final settlement of the disputes. Also, in view of the procedural stage of the cases, the available legal arguments and the assessment of the likelihood of winning, management considers that the overall probability of a favorable outcome is greater than the likelihood of an unfavorable outcome. As a result, no provision has been recognized, and these disputes are presented as contingent liabilities in the notes to the consolidated and individual financial statements.

The Bank is subject to an ongoing investigation by the Romanian Competition Council related to the ROBOR benchmark. As at 31 December 2025, the investigation has not been concluded, and no reliable estimate of the potential financial impact can be made.

42. Earnings per share

The calculation of basic earnings per share was based on the net consolidated profit attributable to ordinary shareholders of the parent company of RON 4,478,867 thousand (2024: RON 4,554,834 thousand) and on the weighted average number of ordinary shares outstanding during the year of 1,089,255,928 (2024 recalculated: 1,089,433,486 shares). The diluted earnings per share for 2025 and 2024, took into consideration the adjusted consolidated net profit of RON 4,478,867 thousand (2024: RON 4,554,834 thousand) attributable to the ordinary shareholders of the parent company and the weighted average number of outstanding diluted ordinary shares. For 2024-2025, the amount of convertible bonds was 0, in this case the diluted net profit attributable to the shareholders is equal with the net profit of the Group and the earning per diluted share is the same as the earning per ordinary share. The weighted average number of diluted shares was determined as the sum of the weighted average number of ordinary shares and the number of shares which would have been issued upon the conversion of all potential dilutive shares into ordinary shares.

On December 31, 2025 and December 31, 2024, the Bank no longer held convertible bonds, the number of diluted outstanding shares being the same as the weighted average number of shares, and the diluted earnings per share being the same as the basic earnings per share.

	Group	
	2025	2024
Ordinary shares issued as at January 1	916,879,846	798,658,233
The impact of shares issued as of January 1	173,442,379	118,221,613
The impact of the shares repurchased during the year	(1,066,297)	(888,739)
Retroactive adjustment of the weighted average number of shares outstanding on 31.12.2024	-	173,442,379
Weighted average number of shares as at December 31	1,089,255,928	1,089,433,486
The number of shares that may be issued upon the conversion of bonds into shares	-	-
Weighted average number of diluted shares as at December 31	1,089,255,928	1,089,433,486

43. Derivatives

The structure of the derivative instruments held by the Group and by the Bank as at December 31, 2025 is the following:

<i>In RON thousand</i>	Group			Bank		
	Fair value of Assets	Fair value Liabilities	Notional	Fair value of Assets	Fair value Liabilities	Notional
Interest rate swaps	66,762	180,548	8,078,276	71,800	182,243	8,278,276
Currency swaps	71,168	77,958	2,475,428	70,948	77,947	2,472,773
Exchange rate forward agreements	7,894	3,361	2,748,914	7,894	3,360	2,748,914
Total derivative financial instruments	145,824	261,867	13,302,618	150,642	263,550	13,499,963

The explanatory notes to the financial statements from page 11 to page 184 are an integral part of these financial statements.

Notes to the consolidated and separate financial statements

43. Derivatives (continued)

The structure of the derivative instruments held by the Group and by the Bank as at December 31, 2024 is the following:

<i>In RON thousand</i>	Fair value of Assets	Group Fair value Liabilities	Notional	Fair value of Assets	Bank Fair value Liabilities	Notional
Interest rate swaps	80,093	173,013	6,922,590	77,455	171,805	6,626,572
Currency swaps	62,244	43,825	1,840,417	62,244	43,825	1,840,417
Exchange rate forward agreements	30,693	18,484	5,157,775	15,873	19,653	3,826,106
Total derivative financial instruments	173,030	235,322	13,920,782	155,572	235,283	12,293,095

44. Reconciliation of liabilities resulting from financial activities

The changes of the liabilities resulting from the Group's financial activities carried out in 2025 and 2024 are presented below:

Group 2025 <i>In RON thousand</i>	January 1, 2025	Receipts	Payments	Non-monetary changes Registration of receivables taken from acquisitions	Foreign exchange variation	December 31, 2025
Long-term loans, including subordinated debt (*)	14,325,769	1,932,764	(851,138)	1,451,758	347,755	17,206,908

(*) payments and receipts are reconciled with the cash flow related to the financing activity

Group 2024 <i>In RON thousand</i>	January 1, 2024	Receipts	Payments	Non-monetary changes Registration of receivables taken from acquisitions	Foreign exchange variation	December 31, 2024
Long-term loans, including subordinated debt (*)	11,385,261	4,055,962	(1,148,832)	35,445	(2,067)	14,325,769

(*) the receipts are reconciled with the cash flow related to the financing activity, and the payments are not reconciled with the flow related to the financing activity due to the payment of loans taken over for OTP Bank Romania S.A. and OTP Leasing IFN S.A. from the former shareholder

The changes of the liabilities resulting from the Bank's financial activities carried out in 2025 and 2024 are presented below:

Bank 2025 <i>In RON thousand</i>	January 1, 2025	Receipts	Payments	Foreign exchange variation	December 31, 2025
Long-term loans, including subordinated debt (*)	13,216,753	1,500,000	(150,013)	329,064	14,895,804

(*) payments and receipts are reconciled with the cash flow related to the financing activity

Bank 2024 <i>In RON thousand</i>	January 1, 2024	Receipts	Payments	Foreign exchange variation	December 31, 2024
Long-term loans, including subordinated debt (*)	10,410,122	3,481,870	(674,446)	(793)	13,216,753

(*) payments and receipts are reconciled with the cash flow related to the financing activity

Notes to the consolidated and separate financial statements

45. Business combinations

a) Acquisition of BCR Chisinau S.A. and merger with B.C. Victoriabank S.A.

On January 15, 2024, B.C. Victoriabank S.A. acquired 100% of the share package in BCR Chisinau S.A.. The B.C. Victoriabank S.A. subsidiary is controlled by Banca Transilvania S.A., therefore, starting from this date, Banca Transilvania S.A. also holds control in BCR Chisinau S.A.. This acquisition enables the Group to significantly strengthen its existing market position in the Republic of Moldova.

In the period of 12 months until December 31, 2024 BCR Chisinau S.A. contributed with a gain of RON 3.7 million to the Group's results. For simplification purposes the gain considered to the group results include also the period from January 1 until January 15, 2024.

Total contribution of BCR Chisinau S.A. to the profit of the Group since the acquisition until December 31, 2024 is presented below:

	In RON thousand
Net interest income	27,317
Net fee and commission income	1,440
Operating income	10,079
Operating expenses	(34,251)
Income tax expense (-)	(874)
Total	3,711

The consideration transferred

The fair value of the transferred consideration is RON 57,145 thousand and was paid in cash on the acquisition date. No capital instruments were issued as part of the acquisition of BCR Chisinau S.A..

Assets acquired and liabilities assumed

The table below summarizes the amounts recognized at the acquisition date in respect of the assets acquired and liabilities assumed for BCR Chisinau S.A.:

<i>RON thousand</i>	Accounting Value	Adjustments	Fair Value
Cash, cash equivalents and bank deposits	274,281	2,691	276,972
Loans and advances granted to customers, out of which:	297,895	(940)	296,955
- Gross book value	308,327	(11,372)	296,955
- Expected credit loss	(10,432)	10,432	-
Tangible and intangible fixed assets, investment property and assets related to the right of use	5,760	1,840	7,600
Other assets	179,840	4,403	184,243
Deposits from customers	(513,467)	(1,686)	(515,153)
Loans from banks	(22,034)	-	(22,034)
Other debts	(40,002)	1,408	(38,594)
Total net assets acquired	182,273	7,716	189,989

Fair value measurement

The following valuation techniques were used to determine the fair value of the acquired assets and assumed obligations:

- **Portfolio of loans and receivables from finance leases - performing:** value adjustments have been made to reflect differences in interest rates (contract versus market) as well as lifetime expected credit losses from a participant's perspective over the market. The valuation methodology sought to quantify the possible differences between the interest rates in force and those existing on the market at the valuation date;
- **The portfolio of loans and receivables from financial leasing contracts - non-performing:** the fair value analysis of non-performing loans focused on the ECL estimation, whereby the amount of expected credit losses was estimated taking into account the potential recoveries from guarantees;
- **Loans from banks and financial institutions:** adjustments were made to reflect the difference between contractual and market interest rates;

Notes to the consolidated and separate financial statements**45. Business combinations (continued)****a) Acquisition of BCR Chisinau S.A. and merger with B.C. Victoriabank S.A. (continued)****Bargain gain**

The gain from the acquisition of BCR Chisinau S.A. in amount of RON 132,844 thousand does not constitute a taxable transfer for the difference between the market price of the transferred assets and liabilities and their tax value. The Bargain gain was determined as the difference between the consideration paid (in amount of RON 57,145 thousand) and the fair value of the assets and liabilities of BCR Chisinau S.A. on the date of taking control (in amount of RON 189,989 thousand). The amount is recognised in Statement of Profit or loss under the line "Bargain gain".

Costs related to the acquisition and integration of BCR Chisinau S.A.

The costs related to the acquisition are the costs incurred by the Group with the business combination. These costs include: costs of intermediation, advisory, legal, accounting, valuation and other professional or consulting services, as well as general administrative costs generated within the integration process. The costs related to the acquisition and integration of BCR Chisinau S.A. amounted to RON 2,330 thousand, amounts that are included in the Profit or Loss Account under "Other operating expenses" and "Personnel expenses".

Merger of BCR Chisinau S.A. with B.C. Victoriabank S.A.

On March 01, 2025, B.C. Victoriabank S.A. completed its merger with BCR Chisinau S.A.. The assets of the absorbed entity were transferred entirely and universally to B.C. Victoriabank S.A., thereby consolidating its position in the banking market of the Republic of Moldova.

This merger has no impact on consolidated and separate financial statements of Banca Transilvania S.A..

b) Acquisition of OTP Group and merger of OTP Bank Romania S.A. and BT Building S.R.L. with Banca Transilvania S.A.

On July 30, 2024, Banca Transilvania S.A. acquired 100% of the shares in OTP Bank Romania S.A.. According to the transaction, Banca Transilvania Financial Group also acquired the shares of other companies owned by OTP group in Romania, respectively OTP Leasing Romania IFN S.A., OTP Factoring S.R.L., OTP Advisors S.R.L., OTP Consulting Romania S.R.L., Rea Project One Company S.R.L. and Govcka Project Company S.R.L.. Starting with October 2024, the Group has control in INNO Investments S.A.I. S.A. (OTP Asset Management S.A.I. S.A.). This acquisition enables the Group to significantly strengthen its existing market position in Romania. In the period of 5 months until December 31, 2024, OTP group companies, except from INNO Investments S.A.I. S.A. (OTP Asset Management S.A.I. S.A.), contributed with a profit of RON 55.65 million to the Group's results. In the period of 3 months until December 31, 2024 INNO Investments S.A.I. S.A. (OTP Asset Management S.A.I. S.A.) contributed with a profit of RON 0.96 million to the Group's results.

The OTP Group's contribution to the group's earnings from the date of acquisition until December 31, 2024, is presented below:

	In RON thousand
Net interest income	484,365
Net fee and commission income	39,316
Operating income	67,304
Operating expenses	(530,148)
Income tax expense (-)	(4,234)
Total	56,603

If the acquisition had taken place on January 1, 2024, the management estimates that the contribution of OTP Group to the consolidated profit would have been of RON 129.05 million. This estimation is based on the assumption that preliminary fair value adjustments registered on the acquisition date would have been the same if the acquisition had taken place on January 1, 2024.

Notes to the consolidated and separate financial statements

45. Business combinations (continued)

b) Acquisition of OTP Group and merger of OTP Bank Romania S.A. and BT Building S.R.L. with Banca Transilvania S.A. (continued)

The consideration transferred

The fair value of the transferred consideration is RON 1,722,307 thousand and was paid in cash on the acquisition date. No capital instruments were issued as part of the acquisition of OTP Bank Romania S.A. or in case of the other OTP group companies.

The table below summarizes the amounts recognized at the acquisition date in respect of the assets acquired and liabilities assumed for the purchased entities from OTP Group:

<i>In RON thousand</i>	Accounting Value	Adjustments	Fair Value
Cash, cash equivalents and bank deposits	4,516,338	-	4,516,338
Investment portfolio at amortised cost	1,399,836	(105,788)	1,294,048
Loans and advances granted to customers, out of which:	12,230,139	(59,960)	12,170,179
- Gross book value	12,979,154	(808,975)	12,170,179
- Expected credit loss	(749,013)	749,013	-
Finance lease receivables, out of which:	856,541	(9,513)	847,028
- Gross book value	900,942	(53,914)	847,028
- Expected credit loss	(44,401)	44,401	-
Tangible and intangible fixed assets, investment property and assets related to the right of use	263,658	(29,874)	233,784
Other assets	311,827	14,191	326,018
Deposits from banks	(281,392)	-	(281,392)
Deposits from customers	(12,965,531)	(1,079)	(12,966,610)
Borrowings	(3,294,831)	-	(3,294,831)
Other debts	(458,799)	19,365	(439,434)
Total net assets acquired	2,577,786	(172,658)	2,405,128

Fair value measurement

The following valuation techniques were used to determine the fair value of the acquired assets and assumed obligations:

- **Portfolio of loans and receivables from finance leases - performing:** value adjustments have been made to reflect differences in interest rates (contract versus market) as well as lifetime expected credit losses from a participant's perspective over the market. The valuation methodology sought to quantify the possible differences between the interest rates in force and those existing on the market at the valuation date;
- **The portfolio of loans and receivables from financial leasing contracts - non-performing:** the fair value analysis of non-performing loans focused on the ECL estimation, whereby the amount of expected credit losses was estimated taking into account the potential recoveries from guarantees;
- **Assets related to the right of use:** the fair value was estimated by applying specific valuation methods taking into account the type of asset and the available information and the Management Decision related to the future benefits that the respective assets will bring;
- **Investment portfolio:** adjustments were made to reflect the difference between contractual and market interest rates;
- **Lease liabilities:** in accordance with the requirements of IFRS 16, the fair value of the lease liabilities was determined as the present value of the remaining lease payments.

Bargain gain

The gain from the acquisition of OTP Group companies in amount of RON 682,821 thousand does not constitute a taxable transfer for the difference between the market price of the transferred assets and liabilities and their tax value. The Bargain gain was determined as the difference between the consideration paid (in amount of RON 1,722,307 thousand) and the part of the fair value of the assets and liabilities of OTP group companies on the date of taking control (in amount of RON 2,405,128 thousand). The amount is recognised in Statement of Profit or loss under the line "Bargain gain" of the consolidated and separate financial statements as at December 31, 2024.

Notes to the consolidated and separate financial statements

45. Business combinations (*continued*)

b) Acquisition of OTP Group and merger of OTP Bank Romania S.A. and BT Building S.R.L. with Banca Transilvania S.A. (*continued*)

Costs related to the acquisition and integration of OTP Group

The costs related to the acquisition are the costs incurred by the Group with the business combination. These costs include: costs of intermediation, advisory, legal, accounting, valuation and other professional or consulting services, as well as general administrative costs generated within the integration process.

The costs related to the acquisition and integration of OTP Group amounted to RON 158,695 thousand, amounts that are included in the Profit or Loss Account under “Other operating expenses” and “Personnel expenses” of the consolidated and separate financial statements as at December 31, 2024. The integration costs for the period 2025 – 2026 are estimated to reach the amount of RON 68,600 thousand.

The Group acquired through Fondul Imobiliar de Investitii Alternative BT Property, 100% of the shares in BTP Store Hub Turda S.R.L. in May 2024, 100% of the shares in BTP Store Hub Oradea S.R.L. in October 2024 and 100% of the shares in Inter Terra S.R.L. in December 2024 and it has no material impact on the financial position and performance of the Group.

Merger of OTP Bank Romania S.A. and BT Building S.R.L. with Banca Transilvania S.A.

The mergers between Banca Transilvania S.A. and OTP Bank Romania S.A. and Banca Transilvania S.A. and BT Building S.R.L. were successfully completed on February 28, 2025.

The shareholders of Banca Transilvania S.A. approved these mergers at the Extraordinary General Meeting as of December 18, 2024.

The integration process began in August 2024, the merger being carried out quickly, in just seven months, thanks to the efficient collaboration between the teams of the two banks.

Following the merger, Banca Transilvania S.A. consolidated its leading position on the Romanian banking market, reaching a market share of 22.31%. The merger has brought significant benefits to both banks' customers, giving them access to an extensive ecosystem of banking and complementary solutions.

In the absence of the specific requirements of the International Financial Reporting Standards for legal mergers by absorption, the Bank has opted to present the carrying amount of the identifiable assets acquired and the assumed liabilities taken over in the individual financial statements at the date of the legal merger, February 28, 2025 at values coming from consolidated financial statements of the Group (predecessor accounting).

The merger was carried out based on the following principles:

- the Bank's assets and liabilities are aggregated in the financial statement as follows: 100% of the Bank's assets and liabilities at book value and 100% of the assets and liabilities of OTP Bank Romania S.A. and BT Building S.R.L. measured at carrying amount, taking into account in addition the fair value amortization adjustments that were determined at the acquisition date (July 30, 2024) in accordance with IFRS 3 (at carrying amounts from consolidated financial statements of the Group);
- intra-group balances and transactions have been fully eliminated;
- the retained earnings and reserves include the retained earnings and reserves of the Bank and also the retained earnings after the acquisition related to OTP Bank Romania S.A. and BT Building S.R.L., till the merger and also the bargain gain recognized in the income statement when the Bank acquired OTP Bank Romania S.A. and BT Building S.R.L. in 2024.

Notes to the consolidated and separate financial statements

45. Business combinations (*continued*)

b) Acquisition of OTP Group and merger of OTP Bank Romania S.A. and BT Building S.R.L. with Banca Transilvania S.A. (*continued*)

The balances of identifiable assets and liabilities at the merger date were:

<i>In thousand RON</i>	Fair value recognized at the merger date
Cash, cash equivalents, and placements with banks	263,424
Investment portfolio at fair value and amortized cost	1,128,067
Loans and advances to customers, out of which:	10,171,802
- Gross value	10,540,916
- Adjustments for credit impairment	(369,114)
Tangible and intangible assets, investment property, and right-of-use assets	377,890
Other assets	2,121,831
Customer deposits	(10,381,467)
Borrowings	(1,065,939)
Other liabilities	(260,481)
Total net assets acquired (A)	2,355,127
Investment value (B)	(1,779,828)
Legal reserve taken over at merger (C)	7,235
Equity adjustment (D=A+B+C)	582,534

For the mergers on February 28, 2025 between OTP Bank Romania S.A., BT Building S.R.L., and Banca Transilvania S.A., a prospective approach was applied. According to this approach, it is not necessary to restate the comparative figures in the consolidated and individual financial statements as of December 31, 2025. Therefore, the comparatives for the year 2024 remain as originally presented, reflecting OTP Bank Romania S.A. and BT Building S.R.L. as subsidiaries.

Thus, the individual statement of profit or loss related to OTP Bank Romania S.A. and BT Building S.R.L. for the January–February 2025 period is recognized in the retained earnings at the merger date, and the comparative figures for 2024 were not retrospectively adjusted. This approach aligns with IFRS 3 and IAS 8, which generally do not require retrospective adjustments for post-acquisition restructuring events, such as legal mergers.

c) Acquisition of O.C.N. Microinvest S.R.L.

On October 2, 2025, B.C. Victoriabank S.A. acquired 100% of the shares in O.C.N. Microinvest S.R.L.. The subsidiary of B.C. Victoriabank S.A. is controlled by Banca Transilvania S.A., therefore, starting with this date Banca Transilvania S.A. also has control of O.C.N. Microinvest S.R.L.. Through this acquisition, the Group strengthens its position on the banking market in the Republic of Moldova.

In the period of 3 months until December 31, 2025, O.C.N. Microinvest S.R.L. contributed to the consolidated profit or loss situation with the amount of RON -42.9 million. If the acquisition had taken place on January 1, 2025, the management estimates that the contribution to the consolidated profit would have been of RON 46.5 million.

Total contribution of O.C.N. Microinvest S.R.L. to the profit of the Group since the acquisition until the reporting date is presented below:

	In RON thousand
Net interest income	78,530
Net fee and commission income	1,203
Operating income	(24,522)
Net expense (-) with impairment adjustments, expected losses on financial assets that are not measured at fair value through the profit or loss account	(105,442)
Income tax expense (-)	7,277
Total	(42,954)

Notes to the consolidated and separate financial statements

45. Business combinations (continued)

c) Acquisition of O.C.N. Microinvest S.R.L. (continued)

The consideration transferred

The fair value of the transferred consideration is RON 331,901 thousand and was paid in cash on the acquisition date. No capital instruments were issued as part of the acquisition O.C.N. Microinvest S.R.L.. The table below summarizes the amounts recognized at the acquisition date in respect of the assets acquired and liabilities assumed for O.C.N. Microinvest S.R.L.:

<i>In RON thousand</i>	Accounting Value	Adjustments	Fair Value
Cash, cash equivalents and bank deposits	292,515	-	292,515
Loans and advances granted to customers, out of which:	1,640,285	47,480	1,687,765
- Gross book value	1,837,395	(149,630)	1,687,765
- Expected credit loss	(197,110)	197,110	-
Tangible and intangible fixed assets, investment property and assets related to the right of use	18,164	21,052	39,216
Other assets	15,269	(4,382)	10,887
Borrowings	(1,546,771)	806	(1,545,965)
Other debts	(30,912)	(1,437)	(32,349)
Total net assets acquired	388,550	63,519	452,069

Fair value measurement

The following valuation techniques were used to determine the fair value of the acquired assets and assumed obligations:

- **Portfolio of loans - performing:** value adjustments have been made to reflect differences in interest rates (contract versus market) as well as lifetime expected credit losses from a participant's perspective over the market. The valuation methodology sought to quantify the possible differences between the interest rates in force and those existing on the market at the valuation date;
- **The portfolio of loans - non-performing:** the fair value analysis of non-performing loans focused on the ECL estimation, whereby the amount of expected credit losses was estimated taking into account the potential recoveries from guarantees;

Bargain gain

The gain from the acquisition of O.C.N. Microinvest S.R.L. in amount of RON 120,168 thousand does not constitute a taxable transfer for the difference between the market price of the transferred assets and liabilities and their tax value. The Bargain gain was determined as the difference between the consideration paid (in amount of RON 331,901 thousand) and the part of the fair value of the assets and liabilities of O.C.N. Microinvest S.R.L. on the date of taking control (in amount of RON 452,069 thousand). The amount is recognised in Statement of Profit or loss under the line "Bargain gain" of the consolidated and separate financial statements.

Costs related to the acquisition and integration of O.C.N. Microinvest S.R.L.

The costs related to the acquisition are the costs incurred by the Group with the business combination. These costs include: costs of intermediation, advisory, legal, accounting, valuation and other professional or consulting services, as well as general administrative costs generated within the integration process. The costs related to the acquisition and integration of O.C.N. Microinvest S.R.L. amounted to RON 1,102 thousand, amounts that are included in the Profit or Loss Account under "Other operating expenses".

d) Acquisition of BRD Societate de Administrare a Fondurilor de Pensii Private S.A.

In November 2025, the Group acquired 100% of the shares of BRD Societate de Administrare a Fondurilor de Pensii Private S.A., thereby obtaining control over the company. The transaction did not have a significant impact on the Group's financial position or performance, and a gain on acquisition of RON 1,224 thousand was recognized. The gain was determined as the difference between the consideration paid (in amount of RON 55,483 thousand) and the fair value of the company's identifiable assets and liabilities on the date of taking control (in amount of RON 56,707 thousand).

Notes to the consolidated and separate financial statements

46. Events after the reporting period

No significant subsequent events were identified after reporting date of the consolidated and separate financial statements.

The financial statements were approved by the Board of Directors on March 24, 2026 and were signed on behalf of the Board.

Horia Ciorcilă
Chairman

George Călinescu
Deputy CEO - CFO

STATEMENT

As per provisions the article 30 of the Accounting Law no. 82/1991, republished, we hereby state that we take full responsibility for preparing the annual financial statements as at December 31, 2025 and confirm that:

- a) The accounting policies used to prepare the annual financial, consolidated and separate statements are in accordance with the International Financial Reporting Standards as endorsed by the European Union ("IFRS"), applicable as at the reporting date December 31, 2025;
- b) The consolidated and separate financial statements, prepared as at December 31, 2025 present a true image of the assets, liabilities, statement of financial position, statement of profit or loss of Banca Transilvania;
- c) Banca Transilvania carries its business on an ongoing basis;
- d) The Annual Report has been prepared in accordance with the ASF Regulation no. 5/2018 and reflects the fair and complete information at the reporting date.

DEPUTY CEO-CFO,
GEORGE CĂLINESCU

March 24, 2026

Refer to the original signed
Romanian version

Refer to the original signed
Romanian version

TRANSLATOR'S EXPLANATORY NOTE: The above is provided as a free translation from Romanian which is the official and binding version

INDEPENDENT AUDITOR'S REPORT

To the Shareholders of
Banca Transilvania S.A.

Report on the Audit of the financial statements

Opinion

1. We have audited the separate and consolidated financial statements ("financial statements") of Banca Transilvania S.A. (the "Bank") and its subsidiaries ("the Group"), with registered office in Calea Dorobantilor, no. 30-36, Cluj-Napoca, Romania, identified by unique tax registration code RO 5022670 which comprise the consolidated and separate statement of financial position as at 31 December 2025, the consolidated and separate statement of profit or loss, the consolidated and separate statement of comprehensive income, the consolidated and separate statement of changes in equity and the consolidated and separate statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.
2. The financial statements as at 31 December 2025 are identified as follows:

• Separate financial statements	
- Equity	RON thousand 20,092,025
- Net profit for the financial year	RON thousand 4,095,290
• Consolidated financial statements	
- Equity	RON thousand 23,297,791
- Net profit for the financial year	RON thousand 4,660,721
3. In our opinion:
 - the accompanying separate financial statements present fairly, in all material respects, the separate financial position of the Bank as at 31 December 2025, its separate financial performance and its separate cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union ("IFRS as Adopted by EU") and National Bank of Romania Order no. 27/2010 for the approval of accounting regulations in accordance with IFRS as Adopted by EU applicable to credit institutions, with subsequent amendments ("Order 27/2010").
 - the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of the Group as at 31 December 2025, its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with IFRS as Adopted by EU and Order 27/2010.

Basis for Opinion

4. We conducted our audit in accordance with International Standards on Auditing (ISAs), Regulation (EU) No. 537/2014 of the European Parliament and the Council (herein after referred to as "Regulation") and Law 162/2017 on the statutory audit of annual financial statements and annual consolidated financial statements and on amending other pronouncements (herein after referred to as "Law 162/2017"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), in accordance with ethical requirements relevant for the audit of the financial statements in Romania including the Regulation and the Law 162/2017, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

5. Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Nature of the area of focus	How our audit addressed the key audit matter
Collective impairment of loans and advances to customers and finance lease receivables According to IFRS 9, the Group accounts for credit losses on loans and advances to customers, respectively for finance lease receivables based on expected credit losses (ECL): for a period up to 12 months for credit exposures for which the credit risk did not increase significantly since origination, and throughout the credit, respectively financial lease receivables lifetime for exposures with significant increase in credit risk, as detailed in significant increase in credit risk and measurement of the expected credit loss allowance policy from Note 4 (b) to the financial statements. As at 31 December 2025, the Group registered an impairment allowance in amount of RON 6,407,047 thousand for Loans and advances to customers in gross amount of RON 106,853,054 thousand and RON 227,295 thousand for Finance lease receivables in gross amount of RON 6,491,194 thousand. The Group exercises significant professional judgement using complex models, extensive data and subjective assumptions over both when and how much to record as impairment for loans, respectively from finance lease receivables. Because loans and advances granted to customers, respectively finance lease receivables form a major portion of the Group's assets, and due to the significance of the management professional judgments applied in classifying loans and advances granted to customers, respectively finance lease receivables into various stages stipulated in IFRS 9 and determining the related impairment level, this audit area is considered a key audit matter. Key areas of professional judgment included: • utilization of historical data for determining risk parameters; • the interpretation of the requirements to determine impairment under application of IFRS 9, which is reflected in the expected credit loss model; • assumptions used in the expected credit loss models to assess the credit risk related to the exposure and the expected future cash flows of the customers; • the identification of exposures with a high level of significant deterioration in credit quality and the industries affected by the restrictions imposed as a result of current economic environment; • potential impact on the assumptions used, increases in credit risk and impairments, and future cash flows as a result of the current social and economic conditions; • assessment of the forward-looking information.	Based on our risk assessment and industry knowledge, with the support of our credit risk experts, we have examined the impairment charges for loans and lease receivables and evaluated the methodology applied as well as the key assumptions made by the management according to the description of the key audit matter. Our procedures included, among the others, the following elements: 1) Evaluating of key controls: We have evaluated the adequacy of the key processes and related key controls applied by management to ensure accuracy of impairment calculation, including: • key controls identified to ensure quality assurance of the methodological aspects used in the development of professional judgments and the ECL models; • key controls related to timely identification of impairment triggers and significant increase in credit risk; • key controls to assess the debtors' financial performance and estimate future cash flows. For the relevant key controls identified in addressing the risks, we have evaluated the design and operating effectiveness of such controls. 2) Evaluating the implementation of the ECL computation methodology into the IT system, including: • evaluating the general IT controls related to data sources and computations of ECL; • evaluating on a sample basis of the credit/leasing receivables quality and stage allocation; • evaluating on a sample basis the ECL computations. 3) Obtaining and analysing the information to support the key assumptions used in: • development of the models for the key risk parameters computation (12-month probability of default, lifetime probability of default and loss given default), including procedures on the source data quality; • development of the expected credit loss models; • development and adequacy of the stage allocation and the criteria used to determine the significant increase in credit risk; • development of models to reflect the potential impact of future economic conditions in the ECL computation; • assessment of the adequacy of the analysis and adjustments made by the management, on all the aspects pertaining to the estimation of expected credit losses, including prospective information on customers loans and leasing portfolio. We have assessed whether the material information on ECL presented in the financial statements and related notes to the financial statements is adequate, in accordance with the applicable IFRS requirements.

Nature of the area of focus	How our audit addressed the key audit matter
Interest Income Recognition	
Refer to Note 8 of the financial statements. For the year ended 31 December 2025 the Group interest income represents RON 7,995,136 thousand, the main source being loans and advances to customers, respectively RON 614,976 thousand from finance lease receivables. These are the main contributors to the operating income of the Group affecting the Group's profitability. Interest income from loans and advances to customers is accrued over the expected life of the financial instrument using the effective interest rate, while the interest income from finance lease receivables is recognized based on a pattern reflecting a constant periodic rate of return on the net investment in the lease. Fees that are directly attributable to the financial instrument are part of the effective interest rate and accrued over the expected life of such an instrument and are presented as interest income. Revenue recognition specifics, a high volume of individually small transactions which depends on data quality of interest and fee inputs and on IT system for their recording, resulted in this matter being identified as a key audit matter.	We have evaluated the design and operating effectiveness of the key internal controls and focused on: • data input on interest and directly attributable fees for loans and advances to customers, respectively finance lease receivables; • management oversight and control on interest income results, including budget monitoring; • IT controls relating to access rights and change management of relevant automated controls, with the assistance of our IT specialists. We performed also the following procedures with regard to interest income recognition: • we evaluated the accounting treatment in respect of fees charged to clients to determine whether the methodology complies with the requirement of the relevant accounting standard. We have focused our testing on challenging the correct classification of fees that are identified as directly attributable to the financial instrument and are part of the effective interest rate; • for a sample of loan and leasing contracts, we assessed the completeness and accuracy of data used for the calculation of interest incomes; • we evaluated the mathematical formula used for accruing the relevant interest income over expected life of the loan, respectively of a finance lease contract; • we have assessed the interest income by building our own expectation on the revenue and compared with the actual results. We have assessed the presentation in financial statements of the interest income in accordance with the applicable IFRS requirements.

Other Information – Administrators' Report

6. The administrators are responsible for the preparation and presentation of the other information. The other information comprises the Board of Directors report ("Administrator's report") which includes the Sustainability Statement and also the Remuneration Report, but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements for the year ended 31 December 2025, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

Other reporting responsibilities with respect to other information – Administrators' report

With respect to the Administrators' report, we read and report if this has been prepared, in all material respects, in accordance with the provisions of National Bank of Romania Order no. 27/2010, articles 32-34.

On the sole basis of the procedures performed within the audit of the financial statements, in our opinion:

- The information included in the Administrators' report and the Remuneration report for the financial year for which the financial statements have been prepared are consistent, in all material respects, with these financial statements;
- The Administrators' report has been prepared, in all material respects, in accordance with the provisions of National Bank of Romania Order no. 27/2010, articles 32-34.

Moreover, based on our knowledge and understanding concerning the Group and its environment gained during the audit on the financial statements prepared as at 31 December 2025, we are required to report if we have identified a material misstatement of this Administrators' report. We have nothing to report in this regard.

Other reporting responsibilities with respect to other information – Remuneration report

With respect to the Remuneration report, we read it to determine if it presents, in all material respects, the information required by article 107, paragraphs (1) and (2) of Law 24/2017 regarding the issuers of financial instruments and market operations, republished. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

7. Management is responsible for the preparation and fair presentation of the financial statements in accordance with Order 27/2010 and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.
8. In preparing the financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.
9. Those charged with governance are responsible for overseeing the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

10. Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.
11. As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:
 - Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
 - Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
 - Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
 - Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
 - Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
 - Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the Group audit. We remain solely responsible for our audit opinion.
12. We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.
13. We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

14. From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

Requirements for audits of public interest entities

15. We have been appointed by the General Meeting of Shareholders dated 26 April 2023 to audit the financial statements of Banca Transilvania S.A. for the financial year ended 31 December 2025. The uninterrupted total duration of our commitment is three years, covering the financial years ended 31 December 2023 until 31 December 2025.

We confirm that:

- Our audit opinion is consistent with the additional report submitted to the Audit Committee of the Bank that we issued the same date we issued this report. Also, in conducting our audit, we have retained our independence from the Group.
- No non-audit services referred to in Article 5 (1) of EU Regulation No. 537/2014 were provided.

Report on Other Legal and Regulatory Requirements – Report on the Information Regarding Income Tax

16. For the financial year preceding the financial year for which the financial statements were prepared, the Bank was not required under National Bank of Romania Order no. 27/2010 with subsequent amendments, to prepare and publish a report on income tax information.

The engagement partner on the audit resulting in this independent auditor's report is Irina Dobre.

Report on compliance with the Law 162/2017 on the statutory audit of annual financial statements and annual consolidated financial statements and on amending other pronouncements ("Law 162/2017"), and Commission Delegated Regulation (EU) 2018/815 on the European Single Electronic Format Regulatory Technical Standard ("ESEF")

17. We have undertaken a reasonable assurance engagement on the compliance with Law 162/2017 and Commission Delegated Regulation (EU) 2018/815 applicable to the financial statements included in the annual financial report of Banca Transilvania S.A ("the Bank") and its subsidiaries ("the Group") as presented in the digital files which contain the unique LEI code 549300RG3H390KEL8896 ("Digital Files").

(I) Responsibilities of management and those charged with governance for the Digital Files prepared in compliance with the ESEF

Management of the Bank and of the Group is responsible for preparing Digital Files that comply with the ESEF. This responsibility includes:

- the design, implementation and maintenance of internal control relevant to the application of the ESEF;
- the selection and application of appropriate iXBRL mark-ups;
- ensuring consistency between the Digital Files and the financial statements to be submitted in accordance with Order 27/2010.

Those charged with governance are responsible for overseeing the preparation of digital files that comply with the ESEF.

(II) Auditor's Responsibilities for Audit of the Digital Files

Our responsibility is to express a conclusion on whether the financial statements included in the annual financial report complies in all material respects with the requirements of ESEF based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ISAE 3000) issued by the International Auditing and Assurance Standards Board.

Our firm applies International Standard on Quality Management 1 ("ISQM1"), and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

A reasonable assurance engagement in accordance with ISAE 3000 involves performing procedures to obtain evidence about compliance with ESEF. The nature, timing and extent of procedures selected depend on the auditor's judgment, including the assessment of the risks of material departures from the requirements set out in ESEF, whether due to fraud or error. A reasonable assurance engagement includes:

- obtaining an understanding of Bank's and Group's process for preparation of the digital files in accordance with ESEF, including relevant internal controls;
- reconciling the digital files including the marked-up data with the audited financial statements of the Bank and Group to be submitted in accordance with Order 27/2010;
- evaluating if all financial statements contained in the annual report have been prepared in a valid XHTML format;
- evaluating if the iXBRL mark-ups, including the voluntary mark-ups, comply with ESEF requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Conclusion

In our opinion, the financial statements for the year ended 31 December 2025 included in the annual financial report in the Digital Files comply in all materials respects with the requirements of ESEF.

In this section, we do not express an audit opinion, review conclusion or any other assurance conclusion on the financial statements. Our audit opinion relating to the financial statements of the Bank and Group for the year ended 31 December 2025 is set out in the *Report on the audit of financial statements* section above.

Irina Dobre, Audit Partner

For signature, please refer to the original Romanian version.

Registered in the Electronic Public Register of Financial Auditors and Audit Firms under no. AF 3344

On behalf of:

DELOITTE AUDIT SRL

Registered in the Electronic Public Register of Financial Auditors and Audit Firms under no. FA 25

The Mark Building, 84-98 and 100-102 Calea Grivitei, 9th Floor, District 1
Bucharest, Romania
27 March 2026

INDEPENDENT LIMITED ASSURANCE REPORT

ON THE SUSTAINABILITY STATEMENT FOR THE FINANCIAL YEAR 2025

To the Shareholders of Banca Transilvania S.A.

Limited Assurance Conclusion

We have conducted a limited assurance engagement on the Sustainability Statement included in Annex 1 from the Board of Directors Report of Banca Transilvania S.A. (the "Bank") and its subsidiaries (the "Group") with registered office in Calea Dorobantilor, no. 30-36, Cluj-Napoca, Romania, identified by unique tax registration code RO 5022670, as at December 31, 2025 and for the period from January 1, 2025 to December 31, 2025 (the "Sustainability Statement").

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Sustainability Statement is not prepared, in all material respects, in accordance with local law Order No. 1/2024 amending and supplementing NBR Order no. 27/2010 approving the Accounting Regulations in compliance with International Financial Reporting Standards implementing 29(a) of the EU Directive 2013/34/EU ("Sustainability Legislation"), including:

- Compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Bank to identify the information reported in the Sustainability Statement is in accordance with the description set out in chapter 1, sub-chapter 1.3, section "DR SBM-2 – Interests and views of stakeholders", section "DR SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model" and sub-chapter 1.4 "Impacts, Risks and Opportunities" ("Double Materiality Assessment Process"); and
- Compliance of the relevant taxonomy disclosures detailed in chapter 2, sub-chapter 2.1 "EU Taxonomy" of the Sustainability Statement with the applicable reporting requirements of Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

Basis for Conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements other than audits or reviews of historical financial information.

Our responsibilities under this standard are further described in the Auditor's Responsibilities section of our report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Identification of Applicable Criteria

The Sustainability Statement was prepared by the Administrators of the Bank in order to satisfy the requirements of the Sustainability Legislation, including:

- Compliance with the European Sustainability Reporting Standards introduced by Commission Delegated Regulation (EU) of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council ("ESRS"), including that the process carried out by the Bank to identify the information reported in the Sustainability Statement (the "Process") is in accordance with the description set out in the related chapters of the "Double Materiality Assessment Process"; and
- Compliance of the relevant taxonomy disclosures detailed in chapter 2, sub-chapter 2.1 "EU Taxonomy" of the Sustainability Statement with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

Inherent Limitations in Preparing the Sustainability Statement

The criteria, nature of the Sustainability Statement, and absence of long-standing established authoritative guidance, standard applications and reporting practices allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different organizations and from year to year within an organization as methodologies evolve.

In reporting forward looking information in accordance with ESRS, Administrators of the Bank are required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Bank. Actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Sustainability Statement, Administrators of the Bank interpret undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

Responsibility for the Sustainability Statement

Administrators of the Bank are responsible for designing, implementing, and maintaining a process to identify the information reported in the Sustainability Statement in accordance with the ESRS and for disclosing this process in related chapters of the "Double Materiality Assessment Process" of the Sustainability Statement.

This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Bank's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

Administrators of the Bank is further responsible for the preparation of the Sustainability Statement, in accordance with local Sustainability Legislation, including:

- compliance with the ESRS;
- preparing the relevant taxonomy disclosures of the Sustainability Statement, in chapter 2, sub-chapter 2.2, in compliance with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation");
- designing, implementing and maintaining such internal controls that the administrators determine are necessary to enable the preparation of the Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group sustainability reporting process.

Auditor's Responsibility

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional skepticism throughout the engagement.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities in respect of the Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Designing and performing procedures to evaluate whether the Process is consistent with the Bank's description of its Process, as disclosed in related chapters of the Double Materiality Assessment Process.

Our other responsibilities in respect of the Sustainability Statement include:

- Obtaining an understanding of the entity's control environment, processes and information systems relevant to the preparation of the Sustainability Statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error.
- Designing and performing procedures responsive to disclosures in the Sustainability Statement where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Our Independence and Quality Management

We complied with the applicable independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (the "Code"). The Code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We applied International Standard on Quality Management (ISQM) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by administrators (e.g., stakeholder engagement, business plans and strategy documents); and
 - reviewing the Bank's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures about the Process implemented by the Bank was consistent with the description of the process set out in related chapters of the "Double Materiality Assessment Process".

In conducting our limited assurance engagement, with respect to the Sustainability Statement, we:

- Obtained an understanding of the Bank's reporting processes relevant to the preparation of its Sustainability Statement by
 - performing inquiries to understand the Bank's control environment, processes and information systems relevant to the preparation of the Sustainability Statement;

- Evaluated whether material information identified by the Process to identify the information reported in the Sustainability Statement is included in the Sustainability Statement;
- Evaluated whether the structure and the presentation of the Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Sustainability Statement;
- Performed substantive assurance procedures based on a sample basis on selected disclosures in the Sustainability Statement;
- Obtained evidence on the methods for developing material estimates and forward-looking information and on how these methods were applied;
- Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the EU Taxonomy;
- Performed substantive assurance procedures based on a sample basis on selected EU Taxonomy disclosures;

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Irina Dobre, Audit Partner

*For signature, please refer to the original
Romanian version.*

*Registered in the Electronic Public Register of Financial
Auditors and Audit Firms under no. AF 3344*

On behalf of:

DELOITTE AUDIT SRL

*Registered in the Electronic Public Register of Financial
Auditors and Audit Firms under no. FA 25*

The Mark Building, 84-98 and 100-102 Calea Grivitei, 9th Floor, District 1
Bucharest, Romania
27 March 2026