

**Raiffeisen Bank S.A.**  
**Directors' Report**  
**31 December 2024**

On Financial Statements prepared in accordance with International Financial Reporting Standards as endorsed by the European Union

## DIRECTORS' REPORT ON CONSOLIDATED AND SEPARATE FINANCIAL STATEMENTS

31 December 2024

### 1. GROUP DESCRIPTION

Raiffeisen Bank S.A. is a top universal bank on the Romanian market, offering a wide range of high-quality financial products and services. Raiffeisen Bank S.A. operates since 1st of July 2002 following the merger by acquisition of Raiffeisen Bank S.A. by Banca Agricolă Raiffeisen S.A. The merger between the two banks was performed as at 30 June 2002 in order to streamline the operations of the Raiffeisen Group in Romania.

The Group holds:

- 99.99% investment in Raiffeisen Asset Management S.A., an asset management company with the purpose of administrating funds launched by Raiffeisen Group;
- 99.99% interest in Raiffeisen Leasing IFN S.A.;
- 99.99% interest in Aedificium Bank S.A., an entity exclusively dedicated to saving and lending business.

On November 27, 2024, the ABL shareholders decided to initiate the process of surrendering the banking license, followed by a transparent process, whereby the Bank will fulfill all obligations towards clients and creditors through a voluntary liquidation process. The shareholders' decision was submitted to the National Bank of Romania for prior approval, which is a mandatory prerequisite for the commencement of the voluntary liquidation process, in accordance with applicable legislation.

The Bank has consolidated the financial statements of its subsidiaries in accordance with IFRS 10 "Consolidated Financial Statements".

### 2. RAIFFEISEN BANK'S STRATEGY

In a challenging, rapidly changing macroeconomic environment, Raiffeisen Bank continues to be a pillar of the Romanian economy, staying true to the "Make it happen" culture and quickly coming to the aid of customers by offering affordable financing solutions and continuing to support the transition to a green economy. We strive to bring comfort and ease to our customers' financial and business lives through an increasingly digital banking experience. Also, Raiffeisen Bank is committed to attain sustainable efficiency improvements by means of automation and process optimization.

As an universal bank, with the ambition to become the most recommended financial institution in Romania, Raiffeisen Bank helps its customers achieve their objectives and makes efforts to build strong and long-standing relationships. Raiffeisen Bank introduced "Banking 1:1" in 2023, an interactive and personalized method of creating a financial plan through "Raiffeisen Bank: Smart Finance", using mobile electronic tablets and engaging in a 1:1 dialogue with our clients. This innovation consolidated the Bank's status as a financial institution of the future, so we extended this approach to SME segment and we also intend to implement it for our Corporate customers.

People are fundamental for our growth and Raiffeisen Bank is committed to provide a safe, sustainable and healthy work environment, where talented and diverse people enjoy working and find great career and development opportunities. Hence, the Bank supports leadership development measures to cultivate conscious and effective leaders who inspire people to leverage their full potential and perform at their best.

In addition, we persevere in bringing innovative products to the market, promote further education, develop and strengthen business ties within the local economy, support communities' development and run programs that provide great support to local start-ups. Also, our commitment remains to promote a climate of responsibility, trust and competence.

### 3. ECONOMIC AND BANKING ENVIRONMENT IN 2024

Economic activity continued to grow in 2024, but the advance was unexpectedly slow. Thus, the real Gross Domestic Product (GDP) increased by only 0.9% in 2024 compared to 2023.

In 2024, the solid growth of household consumption was the main driver behind economic growth. The increase in households consumption was driven by favourable labour market conditions and a large increase in real disposable income. Thus, in 2024, the unemployment rate remained at a low level from a historical perspective, net wage earnings increased rapidly in real terms, and pension income increased substantially. After a strong intensification in 2023, the investment activity in the economy

registered a relative stagnation during 2024. Even though domestic demand grew rapidly in 2024, all major sectors of activity (industry, construction, services) performed unexpectedly weak. Agriculture also recorded a large contraction in 2024 amid drought. Weak external demand had a negative impact on exports of goods and services and on industrial activity.

The public budget deficit recorded a very large increase in 2024, reaching 8.7% of GDP, mainly due to a sharp increase in public expenses given the elections held this year. The rapid increases in the public budget deficit and household consumption also led to a substantial increase in external deficits in 2024.

Inflationary pressures continued to ease in 2024, with price increases moderating for all three components of the consumer price index (foods, non-foods, and services). Thus, the annual inflation rate decreased to 5.1% at end-2024 from 6.6% at end-2023. In the context of moderating inflationary pressures, the Central Bank reduced the monetary policy interest rate in July and August, from 7% to 6.5%. Against the backdrop of a very ample surplus of liquidity in the banking system, interest rates in the money market traded at levels below the monetary policy rate throughout the year 2024. Also, their levels at the end of 2024 were slightly lower than those recorded at the end of 2023. Interest rates on bank loans and deposits also decreased throughout 2024.

Lending activity improved on all segments in 2024. This positive development was supported by the rapid growth of the households real disposable income, the maintenance of investment activity at a high level and the decrease of interest rates. The outstanding loans granted by banks to households and companies increased by 8.9% during 2024. The segment of loans granted to the households for consumption and other purposes recorded the best performance in 2024, their advance totalling 17.9% in terms of outstanding amounts. Lending activity also improved in the mortgage loans segment in 2024 after the very poor performance in 2023, with their balance increasing by 4.2% during the year. The rapid increase in real disposable income, the increase in consumption appetite and the reduction in interest rates contributed to the strengthening of household lending in 2024. The balance of loans granted to non-financial companies increased by 7.2% in 2024 as the negative impact of a slowdown in economic growth was offset by the positive impact of maintaining investments in the economy at a high level, the prolongation of government credit guarantee schemes (respectively the "IMM Invest Plus" program) and the decrease of interest rates. Both lending to households and to companies continued to be carried out mainly in RON in 2024. As a result, the outstanding loans in RON granted to the private sector increased by 11.5% in 2024, while the outstanding loans in foreign currency increased by 3.4% last year (in euro equivalent).

The advance of outstanding bank deposits remained very good in 2024, totalling 10.5%. Household deposits registered a sharp rise of 12.5% in 2024 amid the large growth in real disposable income. Outstanding deposits of non-financial companies increased much slower than household deposits in 2024, respectively by 5.9%. During 2024, the population continued to show a higher preference for RON deposits (an increase of 15.6%) in comparison with deposits denominated in foreign currency (an increase of 6.8% in euro equivalent). In the case of non-financial companies, the increase of 3.9% in RON denominated deposits was lower than that of 13.1% (in euro equivalent) of deposits denominated in foreign currency.

The profitability of the banking system remained elevated in 2024 as a result of the increase in banking assets, the still high levels of interest rates (albeit decreasing) and the maintenance of risk costs at low levels. At the same time, the capitalization of the banking system remained high, indicating a strong position against potential adverse shocks. The funding structure of the banking system continued to remain healthy, with loans granted to households and companies representing 66.6% of the deposits of these banking customers at the end of 2024. The NPLs ratio in the banking system stood at a low level at the end of 2024 (2.41% in November), increasing only slightly compared to the end of 2023 (2.37%). The banking sector's exposure towards the public sector increased rapidly during 2024, totalling 27.0% of total gross banking assets of end-year, above the level of 22.6% recorded at the end of 2023.

#### 4. GROUP'S BUSINESS PERFORMANCE IN 2024

##### 1) Highlights

**Raiffeisen Bank had a solid financial performance in 2024, achieving a consolidated profit of nearly 1.7 billion RON.** The strong capital position, reflected by a total capital adequacy ratio of 21.4% before incorporating the profit from the last quarter, and a very comfortable loans/deposits ratio of 75%, allowed us to support the development of the local economy in a sustainable manner. The Bank also demonstrated good operational efficiency, reflected by a cost/income ratio of 44.9% and a competitive return on equity of 23.6%, above the average of the Romanian banking sector.

**Digitalization and personal financial planning are among the fundamental elements of our strategy, in which we constantly invest to provide customers with accessible and personalized digital solutions, using the latest technologies.** The number of customers actively<sup>1</sup> using the Bank's digital channels exceeded 1.6 million by the end of 2024, recording an increase of around 15% compared to the previous year. In addition, our customers benefited from the possibility of accessing personalized financial plans through the Raiffeisen Smart Finance application, available on the tablets used in our branches.

**The net loan stock increased by 9% this year, demonstrating that financing the real economy remains a key pillar of our activity,** alongside supporting customers financial needs. Loans granted to companies consolidated by 10% year-on-year, thanks to increasing demand from customers, our active participation in the government programs "IMM Invest" and "Invest EU," and ongoing partnerships with institutional investors. Loans granted to private individuals segment advanced by 6%, especially from personal loans, which recorded a 9% increase in 2024.

**We remain committed to offering savings solutions tailored to market conditions and our customers' needs.** Customer savings recorded a 20% increase compared to the previous year, due to a 14% growth in the deposit base of individuals and a considerable 30% increase in deposits attracted from corporate customers. This remarkable result reflects the increased trust of customers in the diversity and attractiveness of the Bank's savings products, which were progressively adapted to offer competitive interest rates and convenient features for our customers.

**"Yellow Card That Does Good" initiative launching, a first for the local market, attests the Bank's involvement in supporting causes with a positive impact on the community.** This project marks the debut of the exclusive partnership between Raiffeisen Bank and VISA, the global leader in digital payments. For every transaction at POS or online made by our customers with the new yellow debit card in RON, regardless of the amount, the Bank donates to "Dăruiește Viață" association, in addition to the initial donation of 1 million euros. Thus, we marked the beginning of a new series of civic engagement actions, together with our customers.

##### 2) Balance sheet developments

Raiffeisen Bank activity relies on a balanced and sustainable business model. We are proud of the performances achieved this year, which bring us closer to our goals of strengthening our status as a financial institution of the future and becoming the most recommended bank in the Romanian banking system.

Our efforts were leaned towards supporting customers in achieving their financial goals through personal financial planning and improving digital capabilities, two fundamental pillars of our bi-dimensional development strategy. We are delighted with the notable progress made in the areas of digital products, lending and savings, as well as the increase in customer satisfaction, which confirms their trust in the quality and attractiveness of the products offered by the Bank. In addition, we were actively engaged in supporting the development of Romanian companies by launching the "MoonshotX" program, a first in the Romanian banking market, offering Mid-Market sector companies access to the expertise and financing resources needed to achieve their regional development goals.

In 2024, the balance sheet of Raiffeisen Group recorded a significant growth of 17%, driven by an effective strategy of attracting and diversifying funding sources. We are proud of this result, which reflects the increased trust of customers in the quality and attractiveness of our products.

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<sup>1</sup> Private individual and SME clients who logged in the Raiffeisen mobile or online application at least once in the last month

The main developments related to the asset side of the balance-sheet are seen below:

Condensed assets positions <i>in Ron thousands</i>	Group			Bank		
	2024	2023	Variation	2023	2022	Variation
Cash and balances with Central Bank	14,050,036	13,867,449	1 %	13,990,283	13,802,815	1 %
Loans and advances to Banks at amortized cost	1,214,425	484,640	>100%	1,224,371	495,257	>100%
Loans and advances to customers at amortized cost	48,972,274	41,813,234	17 %	48,282,284	41,259,437	17 %
Financial assets mandatorily at fair value through P&L	137,537	178,427	-23 %	112,076	156,113	-28 %
Investment securities at fair value through OCI	2,161,631	2,725,206	-21 %	2,161,631	2,704,878	-20 %
Investment securities at amortized cost	13,891,351	10,026,621	39 %	13,879,267	10,013,097	39 %
Sundry assets	2,450,781	1,682,270	46 %	2,481,109	1,726,061	44 %
<b>Total assets</b>	<b>82,878,035</b>	<b>70,777,847</b>	<b>17 %</b>	<b>82,131,021</b>	<b>70,157,658</b>	<b>17 %</b>

We increased our securities holdings in 2024 in order to maintain an optimal balance sheet structure, diversify risks, and preserve the net interest margin. Additionally, we actively contributed to meeting the Government's financing needs, thereby supporting the state's economic development and stability.

Excluding the effect of higher placements in the money market, the net loan stock increased by 9% in 2024, demonstrating the Bank's involvement in supporting customers' financial needs and its ability to adapt in a dynamic economic environment with highly competitive prices. Loans granted to companies recorded a year-on-year increase of 10%, fueled by high market demand for loans and the Bank's active participation in the government programs "IMM Invest" and "Invest EU," through which we offered loans under attractive terms. Loans granted to private individuals advanced by 6%, amid higher demand for personal needs loans, which grew by 9% compared to the previous year. Mortgage loans saw a more modest increase of 3%, due to tempered demand in the first part of the year.

Raiffeisen Bank continued its successful partnership with the European Investment Bank (EIB) in 2024 by signing a new financing-guarantee agreement, through which the Bank will support large enterprises and municipalities with populations under 100,000 to strengthen their resilience, competitiveness, and contribution to the transition to a green and digital economy. The new guaranteed scheme will support more than 250 million euros loans to eligible customers over the next few years, under more favourable financing conditions. Currently, the Bank has 10 financing-guarantee signed with the EIF and EIB, through which loans are granted under attractive conditions, with reduced guarantees and longer terms to SMEs, large enterprises, and small municipalities.

#### Loans and advances to customers, before provisioning

<i>in Ron thousands</i>	Group				Bank			
	2024		2023		2024		2023	
	Non-Retail	Retail	Non-Retail	Retail <sup>2</sup>	Non-Retail	Retail	Non-Retail	Retail
<b>Total</b>	<b>28,364,344</b>	<b>21,832,754</b>	<b>22,511,941</b>	<b>20,528,701</b>	<b>28,227,904</b>	<b>21,241,644</b>	<b>22,389,976</b>	<b>20,059,898</b>
LCY	15,506,881	20,583,511	10,223,040	19,160,498	15,892,537	20,026,223	10,523,645	18,722,940
FCY	12,857,463	1,249,243	12,288,901	1,368,203	12,335,367	1,215,421	11,866,331	1,336,958

Looking at the structure of the loan portfolio by currencies, there is a noticeable preference among clients for the local currency, which holds a 57% share in 2024. This preference is more pronounced among individual customers and SMEs, for whom approximately 84% of total loans are RON denominated. Regarding corporate clients, there is an upward trend in loans granted in foreign currencies, especially in euros, due to their increased attractiveness in recent years.

<sup>2</sup> Retail clients include private individuals and legal entities with an annual turnover of less than 1 million euros (Micro clients).

**Condensed liability positions**

<i>in Ron thousands</i>	Group			Bank		
	2024	2023	Variation	2024	2023	Variation
Deposits from Banks, loans from Banks and other FIs	1,328,826	983,486	35 %	708,314	496,673	43 %
Deposits from customers	65,106,151	54,400,238	20 %	65,216,652	54,488,871	20 %
Debt securities issued	5,072,705	5,555,004	(9)%	5,072,705	5,555,004	(9)%
Subordinated liabilities	810,127	326,115	>100%	810,127	326,015	>100%
Sundry liabilities	2,110,183	1,884,827	12 %	2,048,231	1,822,326	12 %
Equity	8,450,043	7,628,177	11 %	8,274,992	7,468,769	11 %
<b>Total liabilities and equity</b>	<b>82,878,035</b>	<b>70,777,847</b>	<b>17 %</b>	<b>82,131,021</b>	<b>70,157,658</b>	<b>17 %</b>

The balance sheet recorded a considerable increase of 17% compared to 2023, reaching nearly 83 billion RON. The main trends driving this evolution are detailed in the following paragraphs.

Customers savings registered a significant advance of 20% compared to the same period of the previous year, supported by growth across all business segments. Term deposits were the main driver behind this evolution, recording a positive variation of 46% year-on-year, thanks to our diversified offering of savings products with highly competitive interest rates, for both individual and corporate clients. The solid performance achieved in 2024 reflects our efforts to strengthen customer relationships and bolster the balance sheet in the long term, to continue the sustainable financing of the real economy.

Current accounts and savings accounts balances consolidated by 4% in 2024, reflecting our customer trust and satisfaction with the Bank's products. The growing trend on these products tempered in the last three years, being explained by the switch towards other products offering higher yields, such as deposits, securities issued by the Ministry of Finance, or investment funds offered by asset management companies.

The Bank continued its active management of its capital position by early redeeming subordinated bonds worth 480 million RON, maturing on December 19, 2029, after obtaining prior approval from the National Bank of Romania. The decision to early redeem these Tier 2 bonds reflects the Bank's proactive approach to capital management, considering the regulatory amortization of Tier 2 instruments in the recognition of own funds in the last five years remaining until maturity.

On December 9, 2024, the Bank obtained a new subordinated loan of 97 million euros with a maturity of 10 years, repayable early starting December 9, 2029. The early redemption and the new loan underline our strategy to optimize the funding structure and enhance capital efficiency.

Solid capitalization and liquidity allow the Bank to continue supporting the development of the Romanian economy through intensive lending activity. The capital adequacy ratio, before incorporating the profit for the fourth quarter, stands at 21.4% on a consolidated level, comfortably above the minimum requirement of 17.6% set by the National Bank of Romania. The liquidity position, reflected by the liquidity coverage ratio, indicates a very good level of 270%, well above the minimum regulatory requirements of 100%.

As of December 31, 2024, the Bank had outstanding 7 eligible green and sustainability bonds with a total volume of over RON 4.9 billion. Thus, the Bank further strengthened its MREL ratio to over 35%, a level significantly higher than the regulatory requirements applicable on December 31, 2024. Additionally, through the sustainable and green format of the bonds issued, the Bank reaffirms its commitment to contributing to Romania's transition towards a sustainable economy, supporting the reduction of regional disparities, and strengthening the resilience and competitiveness of small and medium-sized enterprises.

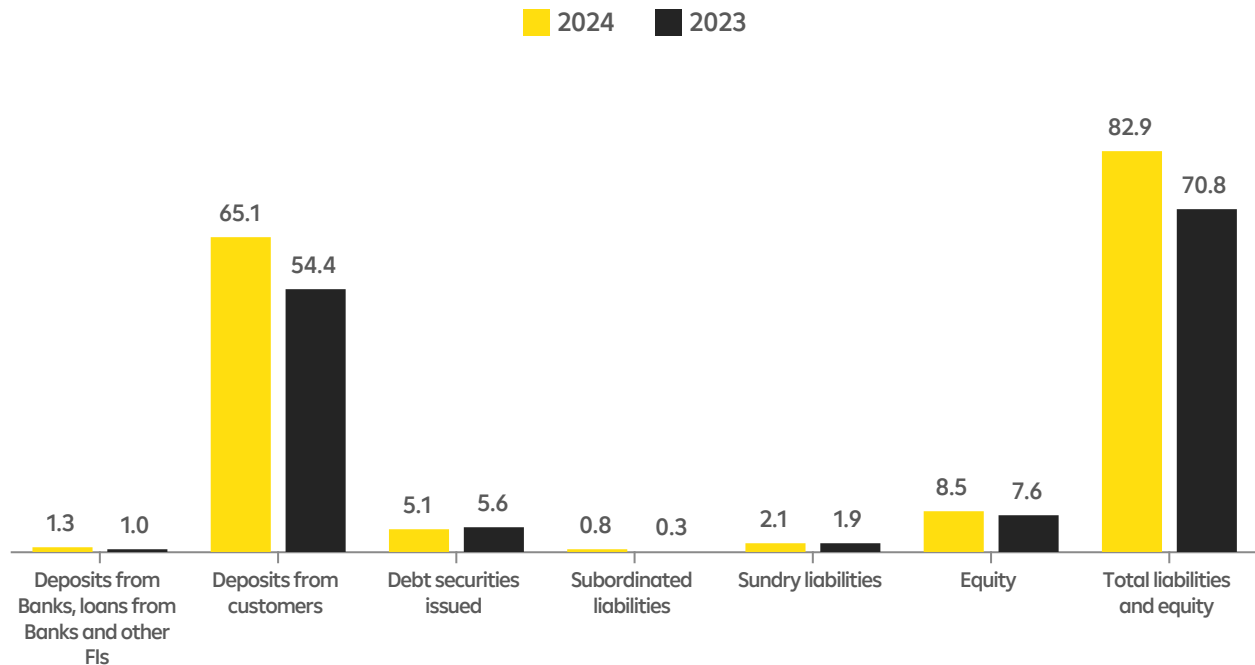
**Deposits from customers**

<i>in Ron thousands</i>	Group				Bank			
	2024		2023		2024		2023	
	Non-Retail	Retail	Non-Retail	Retail	Non-Retail	Retail	Non-Retail	Retail
Deposits from customers	20,495,172	44,610,979	14,481,278	39,918,960	20,607,174	44,609,478	14,582,628	39,906,243
LCY	14,057,933	30,245,881	10,144,788	26,189,205	14,081,510	30,296,608	10,156,287	26,218,851
FCY	6,437,239	14,365,098	4,336,490	13,729,755	6,525,903	14,312,631	4,426,341	13,687,383

Regarding our liability's denominations, the structure between RON and foreign currencies is distributed as 68% for liabilities in RON and 32% for liabilities in foreign currency. This reflects the clients' preference for the local currency, mainly due to the stability of the exchange rate and the higher returns obtained for products denominated in RON.

In 2024, Moody's has reaffirmed the Bank's Baa1 ratings for deposits and senior unsecured debt with stable outlook, two notches above Romania's sovereign rating. It also reaffirmed the Bank's rating for SNP MREL bonds (junior senior unsecured debt) to Baa2, reflecting a strong financial position and demonstrated access to funding through international capital markets.

### Funding sources, end of year balances (RON billion)



### c) Major Profit and Loss components

<i>in Ron thousands</i>	Group			Bank		
	2024	2023	Variation	2024	2023	Variation
Net interest income	3,049,980	2,820,929	8%	2,999,214	2,778,312	8%
Net fee and commission income	672,343	602,250	12%	637,540	567,773	12%
Net trading income	363,712	377,550	-4%	360,588	378,690	-5%
Net gain from other financial instruments at fair value through P&L	-15,001	12,974	-216%	-16,047	11,679	-237%
Other income	29,621	66,993	-56%	37,356	93,513	-60%
Operating and personnel expenses	-2,024,908	-1,827,454	11%	-1,965,277	-1,768,054	11%
Net provisioning for impairment losses on financial assets	-24,983	29,919	-184%	-17,812	34,945	-151%
Goodwill	-	-	n/a	-	-	n/a
Share of gain from associates and joint ventures	7,317	1,166	>100%	-	-	n/a
Income tax expense / revenue	-372,036	-383,560	-3%	-365,184	-377,368	-3%
<b>Net profit after taxes</b>	<b>1,686,045</b>	<b>1,700,767</b>	<b>-1%</b>	<b>1,670,378</b>	<b>1,719,490</b>	<b>-3%</b>

The Group reported a net profit of nearly 1.7 billion RON, recording a slight decrease of 1% compared to the previous year. This result was influenced by the growing operational costs, due to investments in digital capabilities and human resources, as well as the introduction of the 2% banking tax on turnover, in accordance with legislative changes at the beginning of 2024. On the other hand, the evolution of revenues and the maintenance of a very good risk profile of our clients remain among the strengths of our activity this year.

Net interest income increased by 8% compared to the previous year, supported especially by the positive trend in lending activity across all customer segments and the advance of government bonds stock. These factors offset the upward trend of funding cost for savings products, offered to our clients at highly competitive interest rates.

Commission income increased by 12%, driven by higher revenues from insurance and pension funds, in the context of expanding the portfolio of pension plans and life insurances, as well as from a higher number of insurance policies tied to lending products. Another factor for the upward trend in fees was the improved transactional activity for cards products.

Trading income shows a decline of 4% compared to the previous year, due to reduced volatility in financial markets, which limited profitability opportunities from trading activities. We also offered advantageous and competitive margins to clients for foreign exchange transactions, in line with our strategy to build a trusted partnership, essential for the long-term success of the Bank.

Operational expenses grew YoY by 11%, mainly driven by salary increases and employee benefits, to ensure our team is well-prepared and motivated to deliver superior quality services. We also directed investments towards marketing campaigns to increase the visibility of the Bank's products and attract new clients, as well as technological developments to ensure fast, efficient, and secure services. These investments underline our strong commitment to constantly improving the customer experience, promptly and effectively addressing their financial needs.

Provision costs remained at a very low level in 2024, due to the maintenance of client discipline in meeting payment commitments. We also continued to support clients through fixed-rate loans for individuals and by facilitating access for corporate clients to government programs.

### **3) Customers and distribution**

The active customer base grew by 2% in 2024, exceeding 2.3 million clients. At the end of 2024, Raiffeisen Bank's network comprised a total of 272 banking units, 12 fewer than at the end of the previous year, 32,722 EPOS terminals, and over 1,100 ATMs, of which 559 were MFM (multifunctional machines).

## 5. OUTLOOK FOR 2025 CONSIDERED IN THE BUDGETING PROCESS

### 1) Economic developments

We expect the intensity of economic growth to improve in 2025 after the very poor performance materialized in 2024. Thus, we see possible a real GDP growth of 2.5% in 2025 compared to 2024. The economic advance forecasted for 2025 should be supported by the continued increase in household consumption, although the prospects are for a deceleration of the growth pace compared to 2024. Also, investments in the economy should remain on a growth trajectory in 2025 amid the maintenance of an intense investment activity in the public and private sectors and the narrowing of contraction of housing investments. At the same time, we expect the gradual improvement in external demand to contribute to the resumption of the growth trend in exports of goods and services in 2025 after the decline materialized in 2023-2024.

The process of reducing the public deficit initiated in 2025 is expected to have a negative impact on economic growth this year, especially given the high uncertainty regarding the final form of fiscal consolidation measures.

We believe that the initiation of the fiscal consolidation process would keep the inflationary pressures at high levels in 2025. Thus, we foresee that the annual inflation rate would be at 5% at 2025 year-end. Against the backdrop of inflationary risks, as well as of high uncertainty about future inflation developments, we expect the Central Bank (NBR) to continue to behave cautiously with regard to key rate cutting cycle. Thus, we expect the NBR to reduce the monetary policy interest rate to 5.5% by the end of 2025.

Other risks whose materialization could determine an economic performance below expectations in 2025 can be: the escalation of global geopolitical conflicts, the increase in foreign investors' aversion towards Romania amid large macroeconomic imbalances (budget deficit and current account deficit), political instability.

### 2) Developments in the banking industry

Favourable developments in lending activity should continue in 2025 as we expect economic growth to improve, investment activity to remain at a high intensity, favourable labour market developments and some interest rate declines. However, the economic outlook for 2025 is characterized by a high degree of uncertainty. We believe that the risks to our baseline macroeconomic scenario for this year are more on the downside as fiscal consolidation could lead to increases in taxes and to higher inflationary pressures. On the other hand, the low level of financial intermediation and the access to large allocations of EU funds contribute to maintaining a high potential for growth in lending activity in the medium and long term.

We believe that among the risks that could limit the growth of lending activity in 2025 are the delay in interest rate cuts by the Central Bank, as well as weak economic performance. Keeping interest rates high could also be determined by investors' increased risk aversion towards RON assets in the context of broad macroeconomic imbalances and the emergence of tensions on the political scene.

### c) Our perspectives

The Bank's perspectives regarding business activity and financial performance reflect the Bank's budget for 2025. We anticipate that in the upcoming period, the macroeconomic context will support the growth on financial intermediation in Romania, facilitating at the same time the real economy development through a sustainable lending activity on the private sector. Our strategic objectives are leaned towards investments and business initiatives which can ensure the organic growth on lending business in a balanced manner from a segment and product perspective, increase digital customers and the excellence in offering financial advisory services to our clients in order to meet their financial planning objectives.

We are focusing on two major drivers of resilient long-term financial strength: our people and the path to a digital environment; we continue to focus on both fronts and thus strengthen our market position. Our strategy is correlated with the allocation of investments in the two crucial success factors for the future of the Bank, namely our employees and the strength of our digital capabilities; this is a path that we will follow in the next period as well.

## 6. SUBSIDIARIES

### **Raiffeisen Asset Management (RAM)**

S.A.I. Raiffeisen Asset Management S.A. (RAM) is the asset management company of the Group in Romania. RAM's main objective is to develop a wide range of products to best serve our clients' financial purposes.

The year 2024 was characterized by a positive performance of local equity and bond markets, driven by the monetary easing decisions adopted by the National Bank of Romania and the main central banks at the international level, solid demand from local institutional investors and the positive financial results published by most listed companies. Additionally, in the second half of the year, a corrective trend was observed in market developments due to the amplification of political risk and the deterioration of the fiscal-budgetary position, which led to the revision of the country's rating outlook from stable to negative.

In this context, all funds managed by RAM recorded positive performances during 2024, and the volume of assets under management increased by 31.7% to 5.4 billion RON. Thus, RAM consolidated its second position in the ranking of fund managers in Romania, with a market share of 20.3%.

For better visibility and understanding of RAM funds, the classes of the funds were consolidated in the summer of 2024 so that each fund holds a single class, with the exception of the Romania Dividend fund where a new class denominated in EURO was created. We also opened the opportunity for regular investments through the SmartInvest product for any of the RAM funds.

The Raiffeisen Accumulation Pension Fund recorded a positive investment performance, capitalizing on the evolution of local equity and bond markets. In terms of long-term performance (5 and 10 years), Raiffeisen Accumulation remains the best-performing fund in the medium-risk category. This performance was also recognized by participants, with their number increasing by up to 53% in 2024, reaching 100,000 participants.

We continue our efforts to improve the product experience for both investment funds and pension funds. Starting December 2024, participants in the Raiffeisen Accumulation Pension Fund can view their balance directly in the Raiffeisen Smart Mobile app, and in 2025 they will have access to the history of contributions paid in the last 12 months, with the possibility to modify personal data, including the amount of contributions.

### **FINANCIAL LEASING ACTIVITY**

Raiffeisen Leasing IFN S.A. has been representing the Raiffeisen Group on the Romanian Leasing Market since 2002. The company share capital is Ron 39.700.000 and offers a wide range of products for SMEs, corporations and, at a lower extent, for private individuals.

The company provides customized financing solutions in RON or EURO, offering fixed or variable interest finance for various types of projects and assets, such as vehicles, equipment. Raiffeisen Leasing offer is also available in all Raiffeisen Bank agencies.

On 31.12.2024, Raiffeisen Leasing IFN S.A. had assets amounting 404 million Euros and a number above 12.000 active contracts. The company consolidated its portfolio, confirming in 2024 the established strategic lines, registering a balanced structure in terms of customer segments and financed assets and an adequate risk management.

In 2024, Raiffeisen Leasing financed by 67% more new volumes compared to the previous year. This performance reflects the company's commitment to supporting its clients' economic activities by promoting programs and products tailored to their specific financing needs. Consequently, Raiffeisen Leasing has strengthened its position in the leasing market by offering customized and efficient solutions for its clients' business needs.

The Raiffeisen Leasing offer remained in line with the current market conditions. The Raiffeisen Leasing portfolio performed well, in a complicated macroeconomic environment (inflation, lower-than-anticipated economic growth and the nearby military conflict). Integrating ESG approach into Raiffeisen Leasing's business strategy, promoting together with the Bank new products and partnerships for "green" asset financing, with a positive environment impact is part of Raiffeisen Leasing's goals for the coming years.

Raiffeisen Leasing's vision is translated by the slogan "Leasing 1:1", which means consulting, quality interaction, transparency and a sense of responsibility towards customers. Through all its guiding principles and fundamental beliefs, the company aims for a balanced and healthy growth for its clients, sustaining viable businesses, providing easy access to finance, through process efficiency and innovative leasing products.

## SAVING AND LENDING BUSINESS

Aedificium Banca pentru Locuinte S.A. (ABL) activity was focused on offering a product denominated in RON based on a combination between saving and lending.

At the end of 2024, ABL registered a portfolio of 3 active contracts. Total savings deposits from customers amounted to Ron 1,5 million. According to ABL business strategy of a progressive exit from the market, the loans portfolio was transferred to Raiffeisen Bank during 2022 financial year, and the loan activity during 2024 was limited so the outstanding loans balance at the end of 2024 is not material. In 2024, ABL posted an operational negative result of Ron 7,9 million.

## 7. RESEARCH AND DEVELOPMENT

In 2024, the main areas of focus have been accelerating digitalization, enhancing efficiency, and striving for operational excellence. Investments have been directed towards digital channels and simplifying flows for products such as saving accounts, term deposits, life insurances, investments funds and pension funds. We have been gradually transitioning E2E digital sales flows to our interactive Raiffeisen Smart Finance, supporting our clients in building their financial plans.

The number of clients onboarded 100% digitally has significantly increased in 2024, with a 440% rise compared to the previous year, supported by the new simplified mobile onboarding process. By the end of the year, the number of private individual clients with a contract for mobile banking (Smart Mobile) reached 1.8 million, with 80% of them using the application at least once in December.

At the end of 2024, we launched a new platform for quick and simple enrolment using a 100% digital flow for SME clients, initially available to small and medium-sized companies with a single shareholder. Also, we have successfully launched the Athena digital banking solution for Corporate, with the first customers onboarded.

The migration of existing applications to the Cloud continues, with 52% of the Bank's applications already migrated in Cloud, while efforts are ongoing to migrate the remaining applications.

Furthermore, we prioritize regulatory compliance by implementing Basel IV CRR3 requirements for the calculation of capital requirements for credit risk.

## 8. INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM IN RELATION TO THE FINANCIAL REPORTING PROCESS

The objective of financial reporting is to reflect the true and fair view of the statement of financial position, statement of comprehensive income and statement of cash flows, both consolidated and separate. Compliance with all accounting and financial reporting requirements is a prerequisite. The Management Board is responsible for defining and establishing a suitable internal control and risk management system that cover all financial reporting process.

The internal control system provides the management all the needed information to ensure continuously improving internal control for accounting. The internal control system is designed to comply with all relevant guidelines and regulations and optimize the conditions for specific control measures.

The consolidated and separate financial statements are prepared in accordance with Order No. 27/2010 of the National Bank of Romania and subsequent amendments which require that these consolidated and separate financial statements to be prepared in accordance with International Financial Reporting Standards as adopted by the European Union ("IFRS"). The consolidated and separate financial statements are published within first four months of the financial year following the reporting period.

### Control environment

The internal control system in place includes:

- The hierarchical decision-making process for approving the Group and Bank directives and departments instructions;
- Process description for preparation process, quality control, approval, publication, implementation and monitoring the directives and instructions;
- Regulation for revision and repeal of directives and instructions.

The management of each Group member is responsible for implementing the Group directives. Compliance with regulations is monitored by the internal audit missions.

The Audit Committee monitors the accounting process and the effectiveness of internal control, audit and risk management system. The task of the Audit Committee includes the supervision of the annual audit of the consolidated and separate financial statements, which is done at least annually. The Audit Committee is responsible for preparing the Supervisory Board recommendation for selecting the financial auditor. The Audit Committee discusses the efficiency of the risk management system and internal control system. The internal audit must provide to the Audit Committee with quarterly reports in areas audited and with audit findings resulted from the audit performed. The consolidated and separate financial statements are prepared within the Accounting Directorate, which reports to Chief Financial Officer.

### **Risk assessments**

Significant risks relating to the Group accounting process are evaluated and monitored by the Management Board. Complex accounting standards can increase the risk of errors, as well as the use of inconsistent valuation standards. A difficult business environment can also increase the risk of significant financial reporting errors, also the estimation of the assets, especially of those affected by credit risk.

### **Control measures**

All control measures constitute part of the day-to-day business processes and are used to prevent, detect and correct any potential errors or inconsistencies in the financial reporting. Control measures range from managerial reviews of interim results to the specific reconciliation of accounts, through analysing ongoing accounting processes. The local management is responsible for ensuring implementation of mandatory internal control measures, such as the separation of functions and the principle of dual control.

### **Approval and communication of financial statements**

Before publication, the consolidated and separate financial statements are presented to the Board of Directors for approval and submitted to the Supervisory Board. The Supervisory Board is informed of the result of the audit by a statutory report regarding the audit of the consolidated financial statements by the auditor. The consolidated and separate financial statements are published on the company's website.

The annual consolidated and separate financial statements are presented for the approval to the Annual General Meeting, according to applicable legislation and based on the Director's and financial audit reports issued for the respective financial year.

## **9. RISKS**

Raiffeisen Group approaches risk in a prudent manner, in line with its long-term development goals.

### **Risk Management**

The risk management function is independent from the business, and it is focused on the administration and control of the credit, market, liquidity, operational and reputational risk. The management board has overall responsibility for the establishment and oversight of the Bank's risk management framework. In this respect, it has established the Assets & Liabilities Committee (ALCO), Credit Committee, Problem Loans Committee and Significant Risks Committee, which regularly report to the Management Board and are responsible for developing and monitoring the Bank's risk management policies in the specified areas.

Raiffeisen Bank's risk management policies are established to identify and analyse the risks faced by the Bank, to set appropriate risk limits and controls, and to monitor risks and adherence to risk limits. Risk management policies and systems are regularly reviewed to reflect changes in market conditions, products and services offered.

Starting January 2014 following the issuance and coming into force of the EU Directive and Regulation regarding Basel III implementation, the Bank reports to the National Bank of Romania (NBR) the Leverage Ratio, the Liquidity Cover Ratio (LCR) and Net Stable Funding Ratio.

The Bank also completed in 2014 the implementation and reporting of the European Banking Authority (EBA) standards concerning forbearance and non-performing exposures. The NBR and EBA regulations on recovery and resolution are applied by the Bank starting from 2015.

In the context of the complex regulatory environment, the Bank continues the efforts to adapt its IT architecture and the risk policies and procedures to the new legislative requirements and market evolution.

## Credit risk

Credit risk analysis and assessment functions for all activity segments are fully centralized and currently represent a single point of contact for the entire bank. Credit risk activity is organized by industries and specialized by customer segments. This allows a quick reaction to any major change in the micro or macroeconomic environment of Raiffeisen Bank or its customers. Starting with 2009, the Bank implemented a standardized early warning system in order to monitor certain categories of non-retail borrowing customers and retail borrowing customers. This system monitors, on a monthly basis, the selected portfolio in order to identify early warning signs and explain them. Based on these signs, customer portfolio is split into risk groups and actions/strategies are proposed for the problematical customers.

Raiffeisen Bank received NBR approval to determine the capital requirement for credit risk according to internal rating models approach (IRB), starting with July 1st, 2009. Regarding the retail portfolio, Raiffeisen Bank received NBR approval to determine the capital requirement for credit risk according to advanced internal rating models approach (AIRB), starting with December 1st, 2013.

In December 2024, the Bank finalized the implementation of credit risk CRR 3 requirements, to be applied starting from 2025.

## Market risk

Regarding market risk, the Bank currently uses the standard approach for capital requirement calculation. The Bank manages the interest rate and the credit spread risk in banking book in line with EBA and NBR requirements. The market risk management is currently implemented through a set of market risk limits and warning level's structure applied to the Bank's exposures towards interest rate risk both from trading book and from banking book, foreign exchange risk and other subtypes of market risks. The close monitoring process and the monitoring frequency of the established limits and warning levels assure a prudent market risk profile for Raiffeisen Bank. The Bank sets the appetite and tolerance both from economic value perspective and from net interest income sensitivity perspective.

## Liquidity risk

Assets and Liabilities Committee (ALCO) defines the liquidity risk strategy based on recommendations made by Treasury Directorate, which is responsible for liquidity and funding management in cooperation with Group Risk Control and Portfolio Management Directorate, the area responsible for monitoring and control of liquidity risk. ALCO approves each year the limits which are applied to measure and control liquidity risk as well as the Bank's funding plan, which subsequently is approved by the Supervisory Board. The funding plan is updated at least annually in accordance with the balance sheet funding needs, taking into consideration all regulatory requirements imposed by the competent and resolution authorities.

- Risk tolerance represents the foundation of the liquidity risk management framework and is defined:
- for normal business conditions as a maximum allowed maturity mismatch between assets and liabilities, for different time buckets. This prevents the accumulation of significant liquidity risk from current activity;
  - for stress conditions, as a minimum level of liquid assets held as reserve. This ensures the Bank's capacity to absorb liquidity shocks for an acceptable time without significant changes to the strategy or business model.

The liquidity management function ensures the Bank has the capacity to respond to client needs and meet payment obligations. To achieve this objective, a conservative liquidity management is performed, aimed at maintaining adequate long-term funding, within a stable deposit base to support the Bank's lending programs. In addition, on short term, an optimum level of readily available liquidity is maintained, which provides the ability to cover promptly the clients' requests for payments.

The Bank holds a sufficient buffer of liquid assets that can be used to compensate the limited access to funding sources and liquidity outflows during stress conditions. Liquidity management is performed in compliance with all regulatory requirements defined both at European and national levels. The transfer pricing mechanism represents an important instrument for the management of liquidity risks. It covers the balance sheet and off-balance sheet elements and is designed to allocate all costs and benefits to the business segments in a way that incentivizes the efficient use of liquidity.

Diversification of our funding profile in terms of investor types, products and instruments is an important element of the liquidity management framework. Our core funding resources come from retail clients while other customers, bonds issuances, interbank deposits and borrowings are additional sources of funding. This improves the Bank's flexibility in funding and diminishes the liquidity cost.

The main tools used for liquidity risk management and control purposes are: liquidity gap report, internal stress test report, early warning indicator system and regulatory liquidity reports: liquidity coverage ratio (LCR) and net stable funding ratio (NSFR).

### **Operational risks**

Starting with 2010, January 1st, Raiffeisen Bank determines and reports the capital requirement for operational risk, using the standard approach based on the National Bank of Romania's approval from November 2009. This approval was based on the operational risk management framework developed throughout the Bank using the three lines of defence model and the advanced instruments such as: operational risk incidents database, operational risk indicators, risk scenarios, risk assessment matrix. The operational risk management framework is continuously improved, being aligned with the operational risk management framework implemented at RBI Group level.

### **Reputational risk**

At Bank's level the management of reputational risk is structured on the following directions: defining the management framework and identification, evaluation, monitoring and management of the risk. In order to implement the risk strategy for reputational risk, the Bank defined and approved the Reputational Risk Policy which details the roles and responsibilities regarding reputational risk and also the tools used to insure a proper management and control of this risk.

Several tools specific for reputational risk are used:

- reputational risk indicators – indicators that measure the perception and behaviour of the customers – number of complaints, indicators that measure the public perception in the mass-media, relationship with the state authorities;
- reporting of reputational risk events which are managed using specific flows and actions;
- assessment of reputational risk using risk scenarios;
- assessment of reputational risk as part of the bank risk profile.

Reputational risk is a priority for the Bank and we have a continuously focus to improve the management process especially on the level of the awareness of all the employees using specialized training programs.

### **Compliance risks**

As defined by the local regulatory framework (NBR Regulation no. 5/2013 on prudential requirements for credit institutions), compliance risk is the current or future risk of affecting profits, and, own funds or liquidity, which may lead to significant financial losses or which may affect the reputation of a credit institution as a result of non-compliance with the legal and regulatory framework, agreements, agreements, recommended practices or with applicable ethical standards.

At Raiffeisen Bank, the compliance function is an independent, permanent and effective compliance risk management function within the second line of defence, having as main responsibilities the identification, evaluation, monitoring and reporting of compliance risk, as well as the provision of compliance consultancy, being represented by the Compliance Directorate. The Compliance Directorate has the obligation to report regularly to the Directorate and the Supervisory Board, while having the possibility to report directly to the latter.

In Raiffeisen Bank, the governing bodies supervise the implementation of the Compliance Policy, which is communicated to all employees, being available on the Bank's Intranet.

Considering that compliance with the legal and regulatory framework is one of the main objectives of the organization as a whole, in order to properly address and manage compliance risk, at the level of the Bank, the three defense lines model was implemented, allowing the attribution and coordination of specific tasks related to the control and management of compliance risk at all lines level, as follows:

- FLOD (First Line of Defense) is represented by business areas, operations, IT etc, and their main responsibility is to own and manage risk by ensuring that the control environment is established as part of the day-to-day operations, considering also the provisions of art 29 alin.(3) - NBR Regulation no. 5/2013: *"The entire staff of a credit institution must be fully aware of their responsibilities in terms of risk management. The responsibility for risk management should not be limited to risk specialists or internal control functions. Operating units, under the supervision of the management body, are primarily responsible for the day-to-day risks management, taking into account the credit institution's risk appetite and risk capacity and in accordance with the credit institution's policies, procedures and controls";*
- SLOD (Second Line of Defense) is represented by the Compliance Directorate and its main responsibilities refer to: identification, advising, assessment, monitoring, and reporting and training on compliance risks;

- TLOD (Third Line of Defense) is represented by the Internal Audit function and its main responsibility refer to an independent assurance of effectiveness and efficiency of internal control framework.

In Raiffeisen Bank, compliance includes the following areas: preventing and combating money laundering and terrorist financing (AML, KYC, CFT) international sanctions (FISA), FATCA/CRS, financial services (MiFID etc.), Market Abuse (MAD), Anti-Fraud, ABC, Internal Control System.

The Bank is committed to combating financial crime and ensuring that its products are not misused for the purposes of money laundering, terrorist financing etc.

The Bank has zero tolerance for illegal or non-ethical businesses, such as bribery and corruption, for activities involving money laundering and terrorist financing, and other illegal activities, such as tax evasion, tax evasion, and corruption, trafficking in human beings, illegal/adult business or entertainment (collectively „illegitimate activities“).

## **10. CORPORATE GOVERNANCE**

Corporate governance stands for the set of principles and mechanisms based on which the company's management exerts its prerogatives of management and control in order to reach the envisaged objectives through implementing the adopted strategy, having an ongoing fair behaviour towards its clients, counterparts, shareholders, investors or supervisory authorities.

Raiffeisen Bank S.A. (The Bank) pays major importance to a responsible and transparent management in order to maintain fair information and confidence of different interested parties (not only of the participants on the capital market). Therefore, the Bank applies the principles defined in the Corporate Governance Code (CGC) of the Bucharest Stock Exchange (BSE), which can be found on their web page – [www.bvb.ro](http://www.bvb.ro).

### **THE GENERAL MEETING OF SHAREHOLDERS (GMS)**

The General Meeting of Shareholders (“GMS”) is the supreme authority of the Bank. The General Meeting of Shareholders may be Ordinary or Extraordinary. In accordance with the Articles of Incorporations of the Bank and the legislation in force, the General Meeting of Shareholders has a series of main competences.

#### ***The Ordinary General Meeting of Shareholders' main competences:***

- To discuss, to approve or to modify the annual financial statements of the Bank, upon the analysis of the Management Board's and Supervisory Board's reports, as well as that of the report and the opinion issued by the financial auditor, and to establish the dividends, if any;
- To elect the members of the Supervisory Board and the financial auditor of the Bank;
- To revoke the members of the Supervisory Board and the financial auditor of the Bank, whenever considered necessary;
- To set the remuneration for the Supervisory Board members, as well as the general principles and limitations with respect to the additional remuneration of the Supervisory Board members, as well as the general principles and limitations with respect to the remuneration of the Management Board members;
- To consider the performance of the Management Board members, to discharge them of liability and to decide to sue them, as case may be;
- To approve the budget of revenues and expenses and the business plan for the next fiscal year.

#### ***The Extraordinary General Meeting of Shareholders' main competences:***

- The change of the legal form of the Bank;
- The merger of the Bank with other companies;
- The dissolution or the split of the Bank;
- The issuance of bonds and conversion of such bonds from a category into another or into shares;
- Decrease the Bank's share capital;
- Any amendments to the Articles of Incorporation of the Bank.

#### ***The following competencies have been delegated to the Management Board:***

- Change the Bank's Headquarter;
- Modify the Bank's object of activity, except for the change of the main field of activity and of the main object of activity;

- Increase of the share capital of the Bank, except when the increase of the share capital is made through an increase of the nominal value of the shares (if such is not performed by incorporation of reserves, benefits and issuance premiums) when the resolution approving the increase of the share capital shall be taken by the EGMS with unanimity of votes;
- The establishment or the closing down of certain ancillary headquarters, such as: agencies, and other similar units with no legal personality;

The conducting of the General Meetings of Shareholders, as well as the regulations with respect to the shareholders' rights and obligations, are regulated by Law no. 31/1990 on trading companies.

## **ADMINISTRATION STRUCTURES**

The administration of Raiffeisen Bank S.A. is performed by the dual management system of the Management Board and the Supervisory Board. The dual management system allows the segregation of the company's management responsibilities – carried out by the Management Board – from the responsibilities of control/supervision that are fulfilled by the Supervisory Board. The dual management system ensures the operational decision-making process to become efficient, while increasing control over the decision makers.

### **The Supervisory Board**

The Supervisory Board exercises an ongoing control over the Bank's current management activity conducted by the Management Board. The Supervisory Board consists of 9 members appointed by the General Meeting of Shareholders within four-year mandates, being possible to be re-elected for additional mandates.

As of **31.12.2024**, the Supervisory Board structure and the professional background of its members were as follows:

**Johann Strobl** – Chairman

Ph.D. in Economics at the University of Economics and Business Administration, Vienna, Austria

**Hannes Mösenbacher** – Deputy Chairman

Ph.D. in Economics at the University of Economics and Business Administration, Vienna, Austria

**Andreas Gschwenter** – Member

Graduate of the MBA program at the University of Innsbruck, Austria

**Mihaela Cristina Mitroi** – Independent member

Ph.D. in Economics from the Bucharest Academy of Economic Studies

**Andrii Stepanenko** – Member

Ph.D. in Finance, Kyiv National University of Economics, Ukraine

**Lukasz Janusz Januszewski** – Member

Master Degree of Economics, University of Warsaw, Poland

**Pedro Miguel Weiss** – Independent member

Graduate of the MBA program of Duke University, Durham, North Carolina, U.S.A. and holding a certificate of Young Managers Program in 1989 from INSEAD, Fontainebleau, France

**Claudia Patricia Pendred** – Independent member

Graduate of the MBA program of INSEAD (France)

### ***The main competences of the Supervisory Board:***

- Set the exact number of Management Board members, as well as their competences;
- Appoint and revoke the Management Board members;
- Verify the Bank's managerial operations are compliant with the law, with the Articles of Incorporation and with the resolutions of the General Meeting of Shareholders;
- Provide the General Meeting of Shareholders with at least a yearly report regarding the supervision activity undertaken;
- Convene the General Meeting of Shareholders on an exceptional basis, if this be required in the best interest of the Bank;
- To establish advisory committees as required by law, but not only, as these will be considered necessary for the the Bank's activities. The committees will consist of Supervisory Board members;
- To approve and periodically review the general principles of the remuneration policy as well as its implementation. To directly oversee the remuneration of the senior officers in the risk management and in compliance functions.

During 2024, 4 Supervisory Board meetings took place and their decisions were made by the unanimous votes of the attending members. Also, a number of 47 decisions were made by circulation.

The Supervisory Board has set up a number of 4 committees from among its members, namely: the Audit Committee, the Nomination Committee, the Remuneration Committee and the Supervisory Board Risk Committee.

#### **The 4 committees set up by the Supervisory Board:**

##### **The Audit Committee**

The objectives of the Audit Committee are to contribute to the improvement of the Bank activity (in developing and maintaining a good management practice) and to assist the Management Board and the Supervisory Board in their missions.

Audit Committee acts as the interface between the Bank and the statutory auditor or audit firm, and has an important contribution to keep a transparent relationship with the Bank's shareholders.

The statutory auditor or audit firm shall report to the Audit Committee on the essential issues arising from the statutory audit and, in particular, on the significant internal control deficiencies in the financial reporting process.

Audit Directorate regularly provides the Audit Committee with reliable information about its activity carried out. The Audit Committee acknowledge the synthesis of the audit reports concluded by the internal audit and informs the Management Board about the appropriate decisions for the improvement of the Bank's activity and of the internal control, based on the internal audit recommendations included in audit reports. The responsibilities, organization and way of operation are defined by the Rules of Organization and Operations of Raiffeisen Bank S.A.

#### **The Audit Committee is made up of 3 Supervisory Board members, namely:**

**Mihaela Mitroi** – Chairwoman (Independent member on the Supervisory Board);

**Hannes Mösenbacher** – member (Vice-president of the Supervisory Board);

**Pedro Miguel Weiss** – member (Independent member on the Supervisory Board).

During 2024, 4 Audit Committee meetings took place, the Committee's decisions being made by the unanimous votes of the attending members.

##### **The Nomination Committee**

The Nomination Committee identifies and recommends to the Supervisory Board or the Bank's GSM to approve of the candidates who will fill in the vacancies on the Management Board, and the Supervisory Board, respectively, and it regularly assesses the balance of knowledge, skills, diversity and experience within the Supervisory Board and Management Board as well as the knowledge, skills and experience of each member of the Supervisory Board and of the Management Board and of the management bodies (Supervisory Board and respectively Management Board) as a whole. The responsibilities, the organization and way of operation are defined in the Rules of Organization and Operations of Raiffeisen Bank S.A.

#### **The Nomination Committee is made up of 3 Supervisory Board members, namely:**

**Claudia Patricia Pendred** – Chairwoman (independent member on the Supervisory Board)

**Johann Strobl** – Member (Chairman of the Supervisory Board)

**Pedro Miguel Weiss** – Member (independent member on the Supervisory Board)

During 2024, the Nomination Committee held 1 meeting, their decisions being made by the unanimous votes of the attending members. Also, a number of 8 decisions were made by circulation.

##### **The Remuneration Committee**

The Remuneration Committee is responsible for preparing the decisions on remuneration, including those which have implications for the risk and risk management of the credit institution concerned and which are to be taken by the Supervisory Board. Also, the Remuneration Committee is responsible for issuing the decisions on the remuneration of the Management Board and Supervisory Board members, in accordance with the GSM decision. When preparing such decisions, The Remuneration Committee shall take into account the long-term interests of shareholders, investors and other stakeholders in the Bank. The responsibilities, organization and way of operation are defined in the Rules of Organization and Operations of Raiffeisen Bank S.A.

#### **The Remuneration Committee is made up of 3 Supervisory Board members, namely:**

**Mihaela Mitroi** – Chairwoman (independent member on the Supervisory Board);

**Claudia Patricia Pendred** – Member (independent member on the Supervisory Board);

**Johann Strobl** – Member (Chairman of the Supervisory Board)

During 2024, the Remuneration Committee held one meeting, its decisions being made by the unanimous votes of the attending members. Also, a number of 2 decisions were made by circulation.

#### **The Supervisory Board Risk Committee**

The Supervisory Board Risk Committee advises the Supervisory Board and the Management Board on the Bank's risk appetite and strategy and assists the Supervisory Board and the Management Board in overseeing the implementation of that strategy. The responsibilities, organization and way of operation are defined in the Rules of Organization and Operations of Raiffeisen Bank S.A.

#### **The Supervisory Board Risk Committee is made up of 3 Supervisory Board members, namely:**

**Pedro Miguel Weiss** – Chairman (independent member on the Supervisory Board)

**Claudia Patricia Pendred** – Member (independent member on the Supervisory Board)

**Hannes Mösenbacher** – Member (Deputy Chairman of the Supervisory Board)

During 2024, the Supervisory Board Risk Committee held 4 meetings, its decisions being made by the unanimous votes of the attending members. Also, there was one decision made by circulation.

#### **The Management Board (MB)**

The Management Board ensures the managing of the Bank's current business and it has 7 members appointed by the Supervisory Board for mandates of up to 4 years, with the possibility of being re-appointed for additional time periods.

#### **As at 31.12.2024, the Management Board structure and the professional background of its members were:**

**Zdenek Romanek** – President, coordinator of President Division (CEO)

MBA Program, INSEAD (Fontainebleau, France), Master of Economics: Insurance Engineering/Actuary and Banking, University of Economics, (Prague, Czech Republic) and Master of Science: Operation Research and Computer Science, Faculty of Mathematics and Physics, Charles University (Prague, Czech Republic)

**Vladimir Nikolov Kalinov** – Vice-president, coordinator of Retail Division

Graduate of the Marketing and Management Institute, New Delhi, and of the Faculty of Commerce, University of New Delhi, India

**Cristian Marius Sporiş** – Vice-president, coordinator of Corporate Division

Graduate of the Faculty of Finance, Insurance, Banks and Stock Exchanges, Bucharest University of Economic Studies

**Iancu Mircea Busuioceanu** – Vice-president, coordinator of Risk Division (CRO)

Graduate of the Executive MBA Program, University of Sheffield, and the Faculty of Finance, Banks and Accounting, Bucharest University of Economic Studies

**Nicolae Bogdan Popa** – Vice-president, coordinator of Operations & IT Division (COO)

Master Degree in Financial-Banking Management, "Alexandru Ioan Cuza" University of Iaşi, Romania

**Alina Rus** – Vice-president, coordinator of Financial Controlling & Accounting Division (CFO)

CFA, Master Degree on Financial Management and Capital Markets, Academy of Economic Studies, Bucharest, graduate of the Faculty of Finance, Insurance, Banks and Stock Exchanges, Finance and Banks specialization, Academy of Economic Studies Bucharest

**Mihail Cătălin Ion** – Vice-president, coordinator of Capital Markets, Investment Banking and Personal Financial Planning Division

Ph.D. in Economics at the Academy of Economic Studies, Bucharest

#### **The Duties of the Management Board:**

- Convening the GSM according to legal requirements and Articles of Incorporation of the Bank;
- Establishing the reference date for the shareholders entitled to vote in GSM;
- Making proposals for changes to the Articles of Incorporation of the Bank;
- Preparing and submitting to SB, at least every 3 months, a written report regarding the management of the Bank, its activity and its possible evolution as well as information regarding any other matters that could significantly influence the Bank;
- Preparing and providing SB periodically a report regarding the quality of the compliance management, including the assessment of compliance risks;
- Providing SB with the yearly financial situations and its performance report as soon as they have been issued, together with its proposal regarding the distribution of any profit before presenting the said proposal for the GMS' approval;

- Elaborating and periodically, at least once a year, revising the business plan and overall policies and strategies related to the credit institution activity;
- Forecasting the investment plan and income statement and submitting it to the GSM' approval.

**With regard to the recovery activity, the duties of the Management Board are the following:**

- assessment of the actual financial situation of the Bank and of the potential threats;
- decision to initiate a recovery measure;
- nomination of the recovery team responsible to implement the initiated measure;
- monitoring of the execution of initiated recovery measure and decision on further actions to be taken;

**According to Articles of Incorporation the following duties have been delegated by GSM to the Management Board:**

- Relocation of headquarters to another address;
- Modification to the Bank's object of activity except for the change to the main field of activity and of the main object of activity;
- Increase in the Bank's share capital, except for the case when this is made through an increase in the nominal value of the shares (on condition that the increase is not achieved through the incorporations of reserves, benefits and issuance premiums), in which case the decision regarding the share capital increase will be made by the Extra-ordinary GSM unanimously;
- Establishment and closing down of any territorial Bank units with no legal personality;

**The main competences of the Management Board:**

- The Management Board has all the powers of management, disposal and authorization of all transactions falling within the Bank's scope with competences of monitoring the appropriate and efficient functioning of the internal control system, except for the competences expressly granted by law or by other Bank's regulations to the Supervisory Board's and/or the GSM's competence(s);
- Take measures to adopt all business decisions for the implementation of the provisions of the business plan and the budget of Bank;
- Approve the Rules of Organisation and Operation (ROO) - in Romanian called ROF;
- Approve the Organisational Chart and internal structure of the directorates;
- Approve the Collective Bargaining Contract – in Romanian called CCM;
- Appoint and revoke the Directors in the HQ and network and decide their remuneration. For territorial units, no matter the type, these competences are delegated to the Vice-president, coordinator of Retail Banking Division;
- Approve the acquisition/sale/disposal of assets;
- Approve the set-up/closure of new subsidiaries;
- Approve capital increase/decrease of subsidiaries;
- Approve Bank investments/divestment in other companies or financial institutions;
- Establish competencies regarding credit granting (Credit Committee);
- Approve the credit terms for 3rd parties in special relationship with the Bank;
- Approve the number of personnel and establish the remuneration policy in the Bank;
- Approve the credit norms for bank's employees;
- Establish the various committees under its supervision provided by the law, may establish other committees and ratifies their decisions;
- The Management Board approves/reviews the Bank's strategies and policies (including those risk-related) and reviews and submits to Supervisory Board Risk Committee for approval the risk strategy, the risk profile and the Bank's risk manual as well as the results of the yearly risk assessment;
- Any other competences pursuant to mandatory legal provisions (that cannot be legally delegated).

The Management Board set up a number of 14 committees, namely: Asset and Liabilities Committee, Risk Committee, Credit Committee, Problem Loan Committee, Private Individuals Credit Committee, Rules and Procedures Committee, Security Council, Cost Management Committee, Projects & Investments Committee, Investment Committee, Product Governance Committee, Know Your Customer (KYC) Committee, , Retail Customer Relationship Management Committee (Retail CRM Committee) and Raiffeisen Bank Approval Committee for Competitions to which it delegated a series of competences, mentioned in the statutes of the respective committees.

During 2024, the Management Board held 48 meetings, and its decisions were made by the unanimous votes of the attending members. Also, 31 decisions were made by circulation.

#### **The 14 committees set up by the Management Board:**

##### **Asset and Liabilities Committee (ALCO)**

ALCO is responsible for managing the Bank's Balance Sheet aiming at achieving sustained growth, profitability and solvency. The main goal is to manage assets and allocate funding sources by aligning growth and profitability targets as well as funding mix and capital constraints in order to meet return and risk objectives. From within the Risk Framework, the ALCO:

- sets the strategies for the management funding, liquidity, interest rate risk and market risk as well as capital planning;
- establishes guidelines to meet various applicable regulatory rules and statutes;
- forms a consistent co-policy with other policies of the Bank therefore aligning the management of various risks facing the Bank;
- approves the pricing strategy (interest rates, commissions and fees).

##### **Risk Committee (RC)**

RC approves the Bank's Risk and Internal Control System Frameworks and ensures, through proper policies, standards and methods of Risk Management, that these risks are controlled, with defined boundaries. Supervising the policies, standards and methods implementation, RC ensures risk is within the risk appetite accepted by the Bank.

##### **Credit Committee (CC)**

The Credit Committee is established and functions as a decision-making body on exposures for the following types of clients: Corporate, Specialized Lending Project, SME, Financial Institutions, Regional and Local Authorities, etc, as delegated by the Management Board, according with Credit Decision Authority By-Laws of Raiffeisen Bank Management Board.

CC is responsible for complying with all relevant internal regulation applicable to companies of the Raiffeisen Bank International Group AG, including but not limited to the Group and Local Credit (Risk) Policies and the principles and the standards outlined in the relevant Group Credit Manuals for respective segments.

##### **Problem Loan Committee (PLC)**

The Problem Loan Committee is established and operates as a decision-making body with regard to the problem exposures and it has the authority to approve the first applications immediately after being transferred to the Credit Restructuring and Recovery Directorate, applications for restructuring/recovery strategies, credit reviews, debt write-offs, IFRS provision build-up and release for all types of clients.

##### **Private Individuals Credit Committee (PICC)**

The Private Individuals Credit Committee has the authority to decide non-standard PI Credit Applications and post disbursement requests. The PICC is structured on two different decision levels and has the power to decide on credit applications up to Eur 2 million.

##### **Rules and Procedures Committee**

The Rules and Procedures Committee approves the rules, procedures and other regulations within the Bank and makes sure that they are compliant with the operational requirements and compatible with the other internal and external regulations.

The only regulations in the Bank, which can be issued outside the competency of the RPC, are Presidential Orders, Supervisory Board and Management Board decisions.

##### **Security Council**

The Security Council of Raiffeisen Bank is the top decision forum regarding security within Raiffeisen Bank. The Security Council propose to the Directorate the security strategy, decides security policies and should express the commitment of top management regarding the active support for security within the organization. The Security Council is also representing an interdisciplinary forum regarding security where possible interdisciplinary issues are solved.

The Security Council role is to increase the visibility of security function within organization and should make the top management aware of security current status and security current risks.

### **Cost Management Committee**

The Cost Management Committee (the Committee) is a body defined for the monitoring and approval of the Bank's operational costs, cost saving initiatives, budget overruns at Bank level. The Committee will approve or take note of topics related to the operational expenses of the Bank. The Committee has decision competence on costs initiatives of the Bank. Responsibilities of the committee are cost monitoring and control.

### **Projects and Investments Committee**

The Projects & Investments Committee is the decision body which reviews the performance of the existing Project Portfolio, examines and selects new Projects, prioritizes selected Projects, examines the viability of the Project Portfolio based on the Bank's strategy and reshapes the Project Portfolio. The Committee also decides on wallets structures per divisions for IT change initiatives, including small initiatives (short flows). In special cases the Committee also conducts individual Project reviews.

### **Investment Committee**

The Investment Committee is aimed at endorsing and monitoring the investment strategy supporting the «Investment Advisory Services». The «Investment Advisory Services» comply with the rules set by the supervision authorities, and it is carried out based on the procedure regarding investment consultancy services for Private Banking clients.

#### **The Investment Committee approves:**

- master portfolios for which the investment advisory is offered;
- product categories (asset classes) which may be included in the model portfolios associated with master portfolios, based on DRM and group regulations;
- maximum risk limits of a portfolio model associated to an investment profile as assessed via the appropriateness test;
- strategical and tactical allocation within asset classes.

### **Product Governance Committee**

The Product Governance Committee manages the Bank's «Product Governance Process» for financial instruments offered to specific target markets regardless if they are distributed for execution only, advisory free or advisory.

The products / financial instruments covered by the Product Governance Committee are approved products such as: mutual funds, bonds, derivative products. For the insurance products having an investment component, the distribution strategy is approved within the Investment Committee (ICOM).

A product governance process (PGP) needs to be done for all in-scope products manufactured and distributed (including third-party products) and has the purpose:

- to fulfil the legal and compliance requirements to offer this specific product to the defined end client and
- to provide strategic decisions related to product distribution (if the product will be offered) and how a product should be offered.

### **Know Your Customer (KYC) Committee**

The KYC Committee (the "Committee") approves the initiation/continuation of business relationships with clients (from all segments) with a high risk of money laundering and terrorist financing who have previously received positive opinions with conditions from the Compliance Directorate or the extension of the deadline for updating the Bank customer data (from all segments), in case of escalation (approval competence delegated from Management Board).

The Committee is structured by categories of customers – Retail and Non-Retail – and by 2 levels of approval:

- KYC Retail Level 1 Committee;
- KYC Non-Retail Level 1 Committee;
- KYC Level 2 Committee.

### **Retail Customer Relationship Management Committee (Retail CRM Committee)**

Retail CRM Committee is a governing body for the Bank Retail Management. It is created to set and steer the CRM strategy, standards and goals. The Committee aims to ensure a synchronised integrated approach to reach local targets and support the overall Bank Retail Strategy.

Retail CRM Committee is not the body to approve Bank CRM budgets or CRM projects funding. This is a part of budgeting cycle with the Bank.

The Bank Management Board establishes Retail CRM Committee as an authority to define and steer set of quarterly and mid-term Retail CRM KPIs & OKRs, decide on CRM priorities, adjust and parametrise the principles in 3 areas of CRM operating model.

### **Raiffeisen Bank Approval Committee for Competitions**

The Bank Approval Committee for Competitions („The Committee“) is responsible for approval of competitions with budget up to EUR 200.000 per competition held within of Raiffeisen Bank, in accordance with the provisions of the Total Remuneration Policy, delegated by the Directorate. The competitions with budget above this budget cap should be validated also by the Directorate.

Responsibilities of the Committee:

- Analysis the competition proposals
- Approval/ rejection of competitions submitted to the attention of the Committee.

### **CONFLICTS OF INTEREST**

On RBRO level, there are in place dedicated Conflict of Interest policies for both Bank's staff and Management bodies (Management and Supervisory Board). The management bodies are responsible for the establishment, approval and oversight of effective implementation of conflict of interest policies.

Raiffeisen Bank is monitoring the conflict of interests in order to prevent any conduct that could negatively impact the Bank's clients and partners. The internal COI policies are intended to effectively identify, assess, manage and mitigate or prevent actual and potential conflicts of interest, including those related to financial services performed by the Bank as well as regarding the private, personal interests of the members of the management bodies, which could negatively influence the fulfilment of their duties and responsibilities.

The internal policies impose staff and management bodies to report immediately any situation that could result in a conflict of interest. This could be stemming from close relationships, supplementary jobs, events participations, gifts, invitations and trades with financial instruments, etc. Conflict of interests could as well arise in relation to corruption, fraud and market abuse. Where conflicts of interest arise, the Bank assesses their materiality and takes appropriate mitigation measures.

With respect to policies applied to management bodies or members of management bodies intending to accept positions as: members of the Supervisory Board, Executive Board or directors/administrator positions in entities outside the Raiffeisen Bank International group are required to seek prior approval of the Bank's Supervisory Board. The preliminary approval granted by the Bank's Supervisory Board is also required in cases where members of the management bodies intend to engage in other activities on their own, on behalf of a third party or associate with another companies as a partner/manager.

The appointment to the aforementioned positions is made with prior approval from the Compliance Directorate. The Compliance Directorate acts as the responsible function for assessing potential conflicts of interests related to members of the management bodies. The Supervisory Board of Raiffeisen Bank acts as the final decision – maker and is in charge of accepting the inherent risks resulting from the implementation of proposed mitigation measures (and/ or residual occurring from the respective conflict of interest).

### **PRACTICES OF REMUNERATION AND SELECTION AND ELEMENTS OF DIVERSITY**

The system of remuneration of Raiffeisen Bank S.A. promotes a fair and efficient risk management and does not encourage assuming risks over the tolerated levels. This is in line with the Bank's and Raiffeisen Bank International (RBI) Group's long-term business strategy, objectives, values and interests incorporating measures to avoid conflict of interest.

The remuneration policies of the Bank. are approved by the Supervisory Board through the Remuneration Committee.

The compensation system in Raiffeisen Bank S.A. is governed by the following principles:

- The Compensation system supports the company's long-term business strategy and objectives, its interests and values by using the set of key performance indicators (KPI) of Raiffeisen Bank International and the key cultural competences.
- The principles of compensation incorporate measures to avoid the conflict of interest.
- The compensation policy and principles promote solid and efficient risk management practices and avoid variable payment for assuming risks over the tolerant level for the institution through KPIs and process management (e.g.: the process of assessing performance, risk committees).
- Compensation is based on a functional structure and it is linked to performance. Besides, special rules are applied to the personnel whose professional activity has a material impact on the risk profile.
- Compensation is competitive, sustainable and reasonable and it is defined in accordance with the relative value of work, market and practice.
- The fixed compensation is defined in principle in accordance with the market conditions.
- The compensation structure (variable payment proportion relative to the fixed compensation) is balanced, allowing each employee to have an adequate level of remuneration based on the fixed salary.
- All variable payment programs include minimum levels of performance and a maximum payment threshold.
- Results obtained and of the competences based on both quantitative and qualitative measures, valued within the process of performance assessment and considering financial and non-financial criteria.
- The personnel employed in control functions is compensated independently from the business unit they supervise, has the appropriate authority and their remuneration is determined on the basis of achieving their own objectives without taking into consideration the results of the area they monitor. The fixed and variable remuneration structure should be in favour of the fixed remuneration.
- If an employee is paid a variable compensation, this is done for the measured performance. Performance is translated into results and behaviour: 'what' and 'how', according to performance management system. Therefore, all the variable compensation schemes are linked to the management of performance or a comparative system of setting the targets.

Measuring the performance for the employees holding control functions (e.g. risk, audit, compliance) reflects the specific requirements of the respective positions. Compensating the employees holding control functions is in accordance with achieving the objectives related to the respective functions and, in an independent manner, by the business areas they supervise, but in proportion with their role in the Bank.

In Raiffeisen Bank S.A., the recruitment policy for selecting the management structure members establishes the criteria and procedure according to which the compatibility of those proposed/ appointed as members of the management body should be assessed, and the assessment criteria of those holding key function, too.

The Fit & Proper Policy in Raiffeisen Bank S.A. establishes the applicable internal procedures and the criteria for assessing compatibility, in accordance with the local legal provisions (NBR Regulation no. 5/2013 on prudential requirements for the credit institutions, NBR Regulation no. 12/2020 on the authorization of credit institutions and changes in their situation). Also, the policy defines the measures applicable in the situations whereby those persons are not compatible with the positions in question and how permanent compatibility is ensured.

Since both the EBA guideline and the BNR Regulation no. 5/2013 contain mentions regarding the importance of diversity at the level of senior management, in addition to the standard set of compatibility criteria as regulated by the fit and proper policy, we are aware that differences in gender, age, culture, education and experience of senior management members provide a variety of opinions and experience to facilitate independent insights and sound decisions, adding more value to our organization.

From a gender disparity perspective, it is noted that the underrepresented gender had a percentage of 25% within the Supervisory Board, while in the Directorate, this percentage was 14% at the end of 2024.

The approach of diversity is not limited to the senior management level, but throughout the entire organization, diversity management enhancing opportunities for each employee to increase his own potential and personal contribution to performance. In support of this reality, in 2024 we addressed the organizational diversity level well as the expectations regarding measures dedicated to increase inclusion, through a dedicated survey organized with the Romanian Diversity Chart, member of the European Diversity Platform, to reflect the valuable information extracted in the diversity management policy and strategy. The high response rate confirmed the importance of addressing the existing diversity in the organization. In support of this reality, in 2024 we implemented concrete measures to support a respectful and welcoming work environment for employees, by prohibiting any form of discrimination or harassment, conducting education and awareness actions addressing topics such as ethical versus offensive language, intergenerational collaboration, visible and invisible disabilities, etc., aiming for every individual, regardless of gender, age, disability, or any other distinctive criterion to benefit optimal conditions to achieve their full potential.

Furthermore, the company's Diversity Policy reinforces the Bank's commitment to diversity and inclusion, emphasizing the value of diversity as a strategic asset that brings benefits to both the company and its employees. By actively promoting diversity, equity, and inclusion, Raiffeisen Bank aims to strengthen its position as an attractive employer and better support its customers.

Raiffeisen Bank S.A. annually published a transparency report in accordance with advertising requirements, in accordance with the Regulation no. 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment companies, and on amending requirements of (EU) Regulation no. 648/2012.

This report is drawn up for the year 2024 and is published on the Bank's website at:

[www.raiffeisen.ro/despre-noi/guvernanta-corporativa/transparenta-si-publicare](http://www.raiffeisen.ro/despre-noi/guvernanta-corporativa/transparenta-si-publicare)

## 11. Sustainability statement

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## General Information

### Basis of preparation

#### BP-1: General basis for preparation of the consolidated sustainability statement

The consolidated sustainability statement provides information on the Group's sustainability agendas and activities for the reporting year 2024. This chapter contains the Group's consolidated sustainability statement according to Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (Corporate Sustainability Reporting Directive (CSRD) and local law Order No. 1/2024 amending and supplementing Order No. 27/2010 of the National Bank of Romania.

The consolidated sustainability statement for the reporting year 2024 is not published as a stand-alone report, as in previous years, but is included for the first time as part of the 2024 financial statements in a separate chapter in the Directors' report. In the Directors' report, the Group describes the economic, environmental, and social direct and indirect impact of business activities for the year 2024, which were identified as material based on the double materiality assessment in accordance with the European Sustainability Reporting Standards (ESRS). Although the ESRS form the basis of sustainability statement, some other elements have also been included, based on requests by other stakeholders. (for definition see SBM-2: Interests and views of stakeholders).

In line with the requirements in ESRS 1, the Group included the prescribed disclosures pursuant to the Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, as well as the amending Regulation (EU) 2019/2088 (EU Taxonomy Regulation) and the accompanying delegated acts) as a separately identifiable sections in this sustainability statement.

Based on the Group's double materiality assessment, the 2024 consolidated sustainability statement is organized according to the ESRS disclosure framework. In terms of content, the Group reports on its sustainability strategy the related impacts, financial risks, opportunities and how the Group manages them as well consideration of stakeholders' view. The reported key figures relate to the Group, unless otherwise stated. The consolidated sustainability statement addresses all the Group stakeholders. The consolidated sustainability statement is published annually, and for the reporting year 2024, it was released on 28 March 2025. Deloitte Audit SRL issued a limited assurance report for the consolidated sustainability statement for the reporting year 2024.

The option of excluding certain information relating to intellectual property, know-how, or the results of innovations from disclosure has not been utilized in this consolidated sustainability statement.

The permitted option allowed of omitting the disclosure of impending developments or matters in the course of negotiation has not been utilized by the Bank.

This report has been prepared on a consolidated basis. For details, please refer to the chapter entitled: [Scope of consolidation](#)

The scope of consolidation of the consolidated sustainability statement covers upstream and downstream value chains as defined in the chapter entitled [Definition of value chain](#).

#### Scope of consolidation

The scope of consolidation of the consolidated sustainability statement is generally the same as for the consolidated financial statements which are prepared in accordance with the International Financial Reporting Standards (IFRS) published by the International Accounting Standards Board (IASB) and the international accounting standards adopted by the EU on the basis of Regulation (EC) no 1606/2002 of the European Parliament and of the Council of 19 July 2002 on the application of international accounting standards, including the applicable interpretations of the International Financial Reporting Standards

Further information regarding the scope of consolidation can be found in the consolidated financial statements in [Note 3\(a\) Basis of consolidation](#).

## **BP-2: Disclosures in relation to specific circumstances**

### **Time horizons**

#### **Explanations of time horizons in risk management**

For climate and environment-related risk, the Bank differentiates between the impact expected in the short, medium and long term. As the planning horizon and average loan tenor is typically shorter than the time horizon in which the effects of climate-related change and environmental degradation would primarily arise, a forward-looking approach is considered with a longer than usual time horizon.

- Short term (up to three years) – risks mainly associated with transition risks (e.g. changes in legislation and regulation, changes in technology), i.e. the ability of companies and customers to achieve the transition to a low-carbon economy. The Bank sees opportunities both from supporting its customers with financing, allowing them to achieve the transition to a low-carbon economy, as well as potentially increasing the financing directed at industries that are already advanced in the transition process.
- Medium term (more than three years, up to ten years) – risks driven by the paradigm shift in business models, the emergence of new technologies and continuous updating of regulations, with potentially increasing risks from a physical perspective (if CO<sub>2</sub> reduction is not achieved as targeted). Both physical and transition risks will pose challenges. Technological risks can arise if innovations in connection with energy efficiency result in old technologies that the Bank has invested in becoming outdated and unprofitable. On the other hand, investments in new technologies can also fail if they prove to be technically immature. Regulatory risk in connection with stricter environmental protection laws and regulations can also make existing investments less profitable or even unprofitable. The withdrawal of some investors from the fossil energy sector, especially coal and carbon-dependent industries, is an indication that the corresponding assets of the Bank's customers or investees can be expected to fall in value over the medium term ("carbon bubble"). On the other hand, the Bank sees a good opportunity in terms of investing in new technologies that are more likely to be profitable in the medium term (and divesting from coal).
- Long term (more than ten years) – challenges will come from physical risks, their impact on customers' business models and supply chains, as well as on their ability to mitigate and ensure that their repayment capacity is not severely affected. In the event of an insufficiently orderly climate transition, various long-term scenario analyses suggest large losses, particularly for carbon-intensive industries.

#### **Sources of estimation and outcome uncertainty**

Quantitative information about key value chain activities is often based on averages, assumptions and estimates. The Bank tries to obtain sustainability data directly from its clients. If estimates or quantitative information do not refer to the current reporting date, they are disclosed in the respective chapters.

Where this is not possible external data vendors or sector averages are used, with the support of Raiffeisen Bank International. In most cases several data sources are used. As more sustainability related information becomes available and standardized, for example as a result of the adoption of ESRS, the Group expects to be able to reduce the estimation uncertainty related to the value chain. The main metrics applied in using estimates based on indirect sources are scope 3 emissions. This involves the provision of data quality information in alignment with PCAF (2022), The Global GHG Accounting and Reporting Standard Part A: Financed Emissions. Second Edition. The Bank indicates a high level of measurement uncertainty where metrics or monetary amounts are disclosed.

For corporate customers as well as for project finance transactions, the Bank has implemented an ESG customer score by measuring the impact of ESG-related risk through individual scores.

#### **ESG customer score**

The ESG customer score is used to:

- Assess the ESG performance of customers.
- Assess the mid to long term related risk arising from customers' ESG behaviour.
- Identify customers with a restrictive, transformative, or supportive ESG performance and draw conclusions for the underwriting decisions on certain customers.

The ESG score is based on the following components:

- Environmental: measures the impact of transition risk and physical risk; focus areas are to support transition to a net zero greenhouse gas (GHG) emissions, the circular economy and biodiversity; in addition, the Bank is able to identify those

customers that it would like to support further: either on their way to a low-carbon economy, as a contributor to the circular economy, or due to their low impact/enabling function vis-à-vis the environment (already green industries). The E score is determined on the basis of both quantitative and qualitative factors. Quantitative factors that are considered in the E score relate to the following (this list is not exhaustive):

- Customer CO<sub>2</sub> emissions (all 3 scopes)
- Energy consumption
- CO<sub>2</sub> reduction targets
- Water use
- Share of renewables etc.

Qualitative factors address the actions that the company has put in place to further reduce its environmental footprint.

- **Social:** capturing social risks at the customer level and identifying those with a negative impact on society and/or that contradict the Bank's internal societal standards and reflect negatively on the Bank's reputation. Positive impacts will also be considered and potential support for such customers may subsequently be envisaged. Compliance with existing health and human rights regulations has already been taken into account. A more extensive update of the ESG scoring model was performed in relation to human rights. The model has a closer look at the following areas :
  - Social/human rights-related Code of Conduct and supplier screening.
  - Minimum safety standards in the work environment.
  - Appropriate business behaviour.
  - Supporting diversity and educational aspects at the employee level.

The respective social score questions for assessing social risks can be assigned to five major areas:

- General information.
  - Human capital/human rights.
  - Responsible production.
  - Product-related aspects.
  - Customer-related aspects.
- **Governance:** governance-related risks at the customer level are measured by scoring questions on transparency, business ethics, diversity, strategy and risk management, specifically at the top management level.

The ESG customer score is based on individual assessments by internal financial analysts. Qualitative and quantitative information on E (environment), S (social) and G (governance) criteria is used to evaluate the customer. The ESG score is determined for all corporate credit customers. All customers in the corporate, project finance and sovereign's category have an ESG score. For financial institutions, the ESG score was rolled out at year-end 2024.

### **Customer data collection**

ESG data availability is crucial for the Bank to develop internal customer ESG scoring, improve the financed emissions and may be used to make informed internal steering decisions. Therefore, the Bank has in place a customer questionnaire that enables to gather relevant information on environmental aspects directly from their customers. Since the Bank already covered social and governance-related questions in the regular rating process, the Bank has concentrated on the challenge of collecting data on environmental topics.

The customer questionnaire covers the most important environmental aspects, in particular data on:

- GHG emissions.
- Reduction targets.
- Circular economy.
- Energy consumption.
- Water consumption
- EU Taxonomy KPIs (Turnover, CAPEX).

Social and governance-related information is taken from annual reports and sustainability reports.

Examples of KPIs requested from the customer are as follows:

- GHG Scope 1, 2, 3 emissions.
- Share of taxonomy-eligible and taxonomy-aligned economic activities in total turnover and
- Share of renewable energy consumption.

To further improve data availability and data quality, the Bank employs a mix of measures:

- Engaging with clients and create awareness.
- Implementing KPIs at board level.
- Performing data quality checks.
- Visualizing data collection progress through reports and dashboards.

The remaining topics regarding customer portfolio can be found in the specific CSRD chapters:

- Green Asset Ratio (see chapter entitled [Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation](#)).
- Financed emissions (see chapter [E1-6: Gross GHG emissions of categories scope 1, 2 and 3 as well as total GHG emissions](#)).
- Target setting (see chapter [E1-4: Targets related to climate change mitigation and adaptation](#)).

### **Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements**

There are some additional aspects taken into consideration by the Group being part of Raiffeisen Bank International AG, which has committed itself to the following international initiatives and/or standards: United Nations Global Compact (UN GC), UNEP FI Principles for Responsible Banking (PRB), Science Based Targets Initiative (SBTi), Partnership for Carbon Accounting Financials (PCAF), Global Reporting Initiative (GRI), Taskforce on Climate-related Financial Disclosures Standards (TCFD), Diversity Charta, The Valuable 500 and finally to the United Nations Sustainable Development Goals (SDGs).

### **Regulatory disclosure of ESG risks**

Since the 2022 financial year, it has been mandatory to disclose implementing technical standards (ITS) on Pillar 3 disclosures on Environmental, Social and Governance (ESG) risks as published by the EBA. These standards aim to ensure that stakeholders are well informed about the ESG exposures, risks and strategies of institutions, so that they can make informed decisions and exercise market discipline. The aim is to guarantee the improved consistency, comparability and meaningfulness of disclosures by institutions.

The relevant qualitative information overlaps largely with the disclosure requirements in accordance with ESRS. It is therefore disclosed directly in the appropriate chapters of the consolidated sustainability statement. Conversely, the regulatory Pillar 3 disclosure, is available on the Bank's website, with the quantitative information available only on the website.

## Incorporation by reference

Some ESRS disclosure requirements are closely linked to requirements that the Bank is already subject to, such as the requirement in the Corporate Governance Code (as per the Bucharest Stock Exchange best practices) to describe its governance structure. All references are listed below:

Chapter in sustainability statement	Reference
Scope of consolidation	<a href="#">Consolidated financial statements</a>
The role of the administrative, management and supervisory bodies	<a href="#">Directors' report</a>
Risk management and internal controls	<a href="#">Directors' report</a>
Strategy, business model and value chain	<a href="#">Directors' report</a>

## List of phased-in disclosure requirements

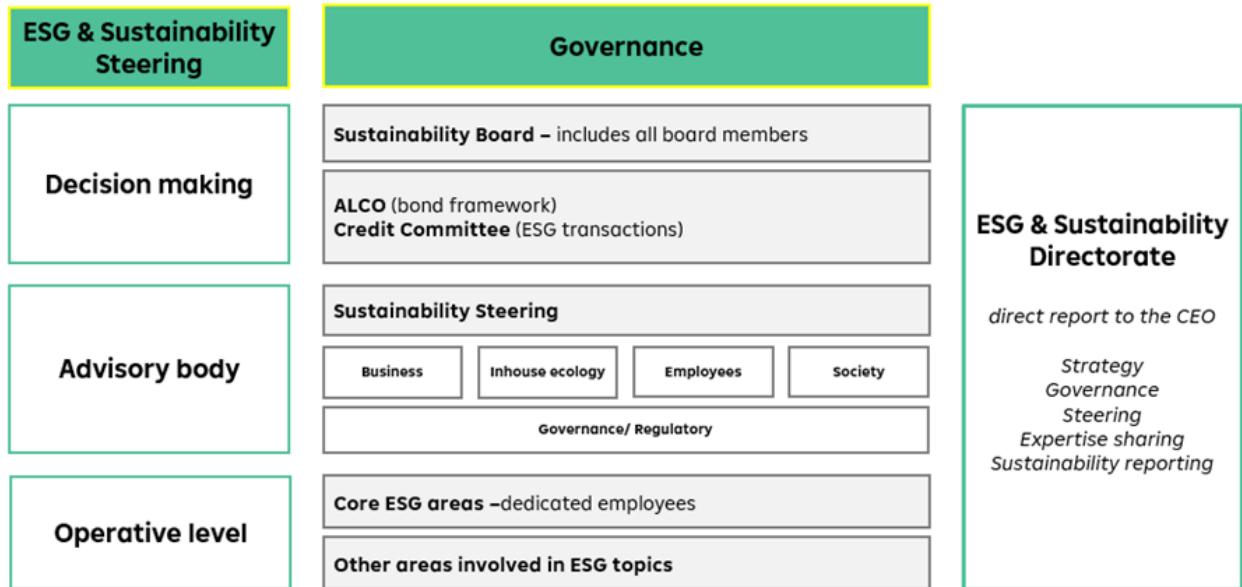
ESRS	Disclosure requirement
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities.
S1-7	Characteristics of non-employee workers in the undertaking's own workforce
S1-14	Health and safety metrics - phase in S1-14 DR 88e

## Governance

### GOV-1: The role of the administrative, management and supervisory bodies

#### The Management Board and Supervisory Board

Organizational anchoring of sustainability in the Bank.



The two- tier management system, which is provisioned by law in Romania, separates the Bank management into two independent bodies: the Management Board, which directs the operational business, and the Supervisory Board, which is responsible for oversight and control. Raiffeisen Leasing IFN S.A. and S.A.I. Raiffeisen Asset Management S.A. operate under one-tier management system, also provisioned by law in Romania.

The highest decision bodies in the Bank in ESG matters are the Management Board and the Supervisory Board. For more detailed information with regard to the number of Management Board and Supervisory Board members, percentage by gender or other aspects of diversity and percentage of independent Supervisory Board members, please refer to the [Directors' Report](#).

The suitability requirements for Management Board and the Supervisory Board members regarding independence and integrity, as well as applicable conflict of interest regulations, ensure that all board members are independent in the sense of the ESRS. The Management Board and the Supervisory Board are collectively responsible for the oversight of key impacts, risks, and opportunities related to the Bank's own operations and the value chain. All members of the Management Board and the Supervisory Board are engaged in this responsibility, ensuring comprehensive and effective governance.

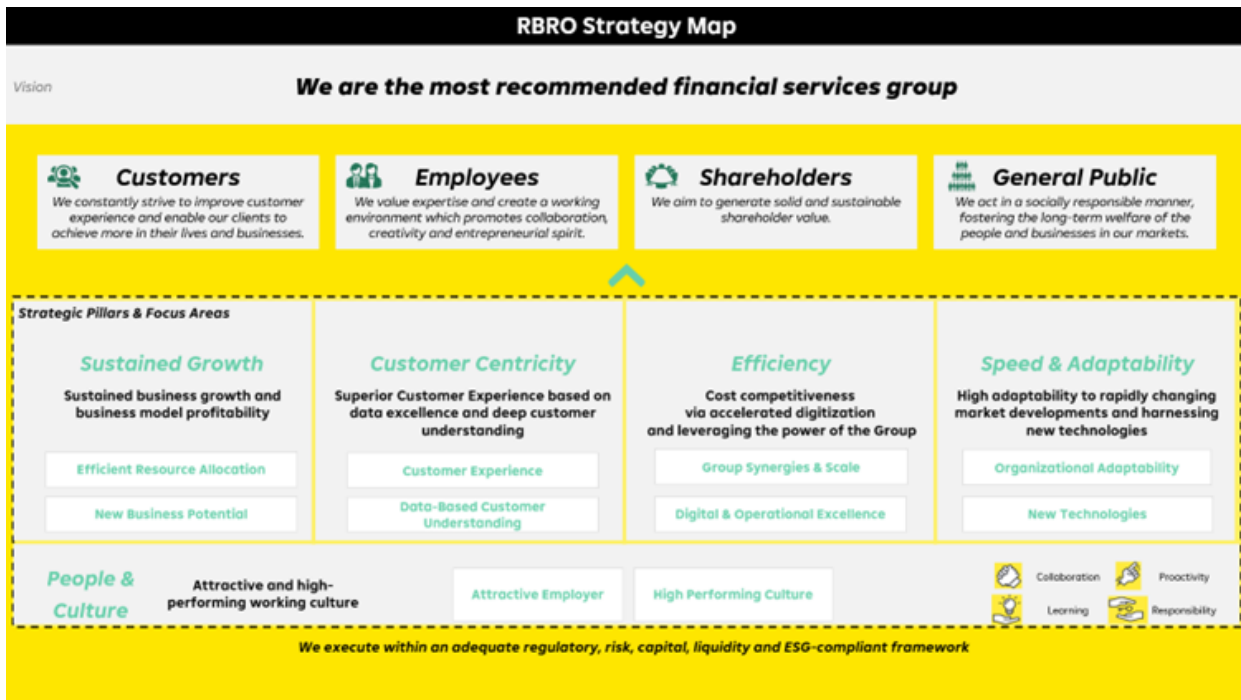
The responsibilities of the bodies are clearly described within the internal bylaws and detailed in the [Directors' Report](#).

Each board area implements, as applicable, its respective sustainability strategy and integrate it into the performance management process. This should be reflected in the ESG policies and conditions for the individual area. For more details please refer to chapter [GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies](#).

The Management Board bears legal responsibility for preparing according to legal requirements, the sustainability reporting as part of the Directors' Report and is responsible for submitting it to the Supervisory Board. The Supervisory Board is reviewing the Directors' Report (including the sustainability reporting) and report on it at the Annual General Meeting.

## Strategy

A Strategy Map has been developed at Raiffeisen Bank International level in order to put strategy into action and further locally implemented at the Bank level. It is intended to function as a standardized implementation instrument as well as an orientation tool for employees. The objectives derived are applied from Management Board level right through to the individual employees. They are included in the targets for the Management Board members.



The strategy translates the Bank's vision into priority initiatives with a planning horizon of two years. The objectives derived are applied from Management Board level right through to the individual employees, as applicable. The ESG KPIs of the Board of Management members are set and aligned as part of the overall KPI setting process.

The progress of these initiatives is determined and communicated to Management Board and Supervisory Board on a regular basis, at least twice a year. It allows the Bank to respond to new market conditions in a timely manner, which is a particularly important factor when faced with rapidly changing underlying conditions.

The Management Board and the Supervisory Board of the Bank possess sustainability-related expertise, both directly and through the support of external resources. Collectively, the Management Board and the Supervisory Board members have broad experience in environmental, social, and governance matters, gained through their professional backgrounds and current or previous roles in the banking and financial sectors. Additionally, the Bank ensures that the Management Board and the Supervisory Board members have ongoing specialized sustainability trainings by in-house and external experts. This includes Fit and Proper training sessions, which also provide updated knowledge on best practices and regulatory changes.

In the Board Climate Governance Workshop held for the Management Board in 2024, information was provided in order to: articulate the business case and rationale for climate (corporate) governance, learn what others are doing in this field, deepen understanding of Management and Supervisory Board roles (particularly in setting up structures and processes for corporate action on climate, working on the climate agenda, integrating climate risks and opportunities into control and risk scope, and disclosures, Supervisory Board committees' roles and management reporting). Discussions were also held on regulatory changes and the resulting new requirements for the Bank.

Expertise and continuous training aim to enable the Management Board to effectively oversee the sustainability strategy, addressing its material impacts, risks and opportunities such as carbon footprint, social responsibility, and governance practices. By leveraging their collective knowledge, the Management Board and the Supervisory Board can identify and manage risks related to climate change, compliance, and reputation, while also capitalizing on opportunities in sustainable finance.

### Supervisory Body

The Supervisory Board/ Audit Committee is playing a crucial role in enhancing the credibility, transparency and reliability of sustainability reporting under the CSRD framework by fulfilling the specific responsibilities in relation to the Directors Report.

### Sustainability Board

The Board of Management as the final decision-making body for ESG & Sustainability strategies, policies and commitments dedicates regular Sustainability Board meetings to supervising and monitoring the company's ESG & Sustainability performance

(notwithstanding any competences of the Supervisory Board and Board of Management as defined by the Bank structure, legal and regulatory framework), with a focus on:

- oversees and approves ESG & sustainability material topics and reporting
- approving the strategy for Sustainability & ESG, prioritizes among initiatives
- performance review on key strategic and operational focus areas
- approving relevant Sustainability KPIs

The Sustainability Board is chaired by the CEO and includes all Board Members. Meetings are conducted at least twice a year and organized by ESG & Sustainability Directorate to assess progress and ensure that ESG strategies and policies are effectively implemented. In 2024, the Sustainability Board held 4 Meetings, main decisions being

- double materiality assessment process and thresholds
- 2023 sustainability reporting voluntary submission, including KPIs

The Board areas implement as applicable the ESG & Sustainability Strategy into their existing Strategic Roadmap in line with the overall bank strategy and integrate the objectives in their performance management with the support of the ESG & Sustainability Directorate and implement with ESG & Sustainability Ambassadors involvement.

### **Sustainability Steering**

Sustainability Steering is a cross-functional and cross-divisional Working Group, with operational steering responsibilities for ESG. This Steering Group reunites the ESG ambassadors and heads of divisions in all board areas mainly dealing with ESG topics and acts as an advisory and recommendation body for the board of management. The members of the Sustainability Steering must have an appropriate level of knowledge and experience in the ESG & Sustainability area.

The Sustainability Steering has the following tasks and responsibilities:

- advises the Management Board on material ESG/ sustainability related topics: actual and potential impacts, risks and opportunities, including updates for the ESG & Sustainability strategy and related policies
- discusses and validates ESG & Sustainability Strategy
- defines, coordinates, and escalates if needed material ESG tasks in different areas.
- recommends ESG KPIs for performance management and/or reporting/ disclosures.
- monitor backlogs of the ESG & Sustainability strategy implementation and safeguards a transparent and continuous progress tracking and steering
- discusses, validates the allocation and management of the eligible cover pool portfolio for the green and sustainability bonds and issues recommendation requests to the Assets & Liabilities Committee with respect to approval of the eligible loan portfolio.. For this topic, the relevant areas will be invited, including but not limited to Business, ESG & Sustainability and Risk

This ESG governance allows for top-down and bottom-up discussions involving all relevant functions. The Sustainability Steering meets regularly and is chaired by the Corporate Vice President and focuses on an intensive incorporation of the ESG & Sustainability Strategy in each area: business, in-house ecology, employees and society.

### **Chief Executive Officer (CEO)**

#### **ESG & Sustainability Directorate**

The Sustainability and ESG Directorate is part of the CEO Division, operating under the direct supervision of the CEO and acts as a center of competence and steering, submitting for decision topics related to ESG & Sustainability in line with the directions and frameworks approved by the Board of Directors and Raiffeisen Bank International guidelines.

The directorate is responsible for steering the planning, implementation, and continuous development of the local approach to ESG & Sustainability topics, developing local expertise on to ESG & Sustainability topics, and other specific activities.

The unit works closely together with and is supported by representatives of specialized units and business areas as well as the Sustainability Steering and Sustainability Ambassadors within the organization. ESG & Sustainability Director is organizing the Sustainability Steering. The unit also steers and supports the community of the Sustainability Ambassadors and acts as center of competence being the central point of contact and center of expertise.

Furthermore, the ESG & Sustainability Directorate and Accounting Directorate are responsible for managing and ensuring the proper annual disclosure obligation for reporting requirements of non-financial data within the consolidated sustainability reporting within the annual report. Within ESG & Sustainability Directorate ESG related activities converge, involving both internal and external stakeholders.

### **ESG & Sustainability internal contributors (ESG & Sustainability Ambassadors)**

The ESG & Sustainability Ambassadors are nominated for relevant areas for the ESG & Sustainability strategy implementation or the sustainability reporting process, and include as main counterparts the following areas:

**Sustainable Finance Department | Corporate** : responsible for corporate sustainable financing, with responsibilities for creating and developing credit products for corporations and cross-divisional, with focus on sustainable financing, which will satisfy the demands of the market and correspond to the bank's strategy as well the elaboration of policies for the relevant products and processes and in collaboration with the other divisions for cross-divisional products. The Corporate Sustainable Finance department functions under the Structure Lending and Project Finance Division. The department provides ESG expertise for corporate customer segments and supports the customer and product departments in advisory discussions and in the structuring of sustainable financing and investment products. In this connection, the department consists of a team of ESG experts. One of its key tasks is to manage corporate sustainable loan portfolios for green and sustainable bond transactions.

**ESG ambassador | SME** : responsible for establishing, implementing, and managing ESG and sustainability products, processes and other topics for SME clients, aligning understanding and applicability of various existing regulations for SME, as well for supporting the development of green and sustainable related business opportunities and representing the SME perspective within the ESG & sustainability governance I.

**ESG ambassador | Private Individuals**: with responsibilities establishing, implementing and managing ESG and sustainability products, processes and other topics for private individuals clients, aligning understanding and applicability of various existing regulations for private individuals clients, as well for supporting the development of green and sustainable related business opportunities and representing the private individuals perspective within the ESG & sustainability governance.

**Treasury (Funding Management)**: with responsibilities to establish and maintain the green and sustainable bond framework and to coordinate the green/ sustainable bond issuance process, with the aim to focus on assets with a positive environmental and social impact in order to support the necessary transition to an environmentally sustainable future.

**Procurement**: responsible to contract the services and goods necessary for the Bank's business and support processes as well as suppliers' management, focusing to achieve the ESG & sustainability targets for in-house ecology.

**Logistics**: responsible to manage the services and goods necessary for the Bank's business and support processes focusing to achieve ESG & sustainability targets for in-house ecology.

**Diversity & Inclusion Officer | People, Culture and Organization (PCO)**: initiates and covers actions regarding diversity and inclusion for all significant areas managed by the PCO, including KPI's with impact on areas specified, actively monitors their achievement and professionally use the potential of our employees' diversity of abilities

**CSR & Sustainability Manager | Marketing, Communication and Customer Experience**: with responsibilities for elaborating the social responsibility (CSR) strategy and setting the lines of societal intervention and CSR projects and actions to support it, elaborating and proposing for approval the volunteering policy and projects.

**ESG Data | Finance Transformation**: coordinate the ESG data and reporting landscape for the overall bank together with relevant stakeholders, in order to translate the ESG regulatory framework into ESG business data needs and reporting requirements, in line with the applicable data governance & reporting framework.

**Sustainability analyst | Risk Controlling**: with main responsibility for evaluation of the credit portfolio from the portfolio management ESG risk perspective, contributing to the development of the sustainability framework, policies, reports and disclosures.

### **Internal audit**

Internal Audit Directorate is a permanent organizational unit within the Bank that performs its duties throughout the year in accordance with auditing standards that are valid across the Group. All auditors work solely for the Bank's Internal Audit. Internal Audit is the relevant audit function and as such also controls all audit functions within the subsidiaries. In general, the Bank uses a risk-based approach to determine the nature and scope of its auditing activities.

Internal Audit is independent in the audit planning, execution and reporting as well as in its evaluation of audit results. Furthermore, the unit and its employees are prohibited from being involved in any decisions or business processes or from assuming any other tasks that are not consistent with the audit function.

The required quality of internal auditing activities is achieved through ongoing monitoring, periodic self-assessments, and external quality assessments to ensure compliance with audit-specific regulations, especially the International Standards for Internal Auditing and the corresponding Code of Ethics. External quality assessments are conducted at least every five years by an independent auditor or third-party assessment team.

Internal Audit has incorporated the strategically important ESG topics into the auditing activities. Since ESG topics affect most business and risk areas, Group Internal Audit monitors ESG topics across all the relevant audit areas, which then serve as input for the annual/quarterly audit plan and for the specific work plan for each individual audit. ESG topics are covered either through specific audits or as one of several topics within an audit. An overview of all the audits is ensured at the area-wide planning stage and at the individual audit level.

For 2024, specific ESG topics were covered in the audits performed. No material findings were identified as a result of these activities.

### **Legal and Corporate Governance**

Legal and Corporate Governance offers legal support within the Bank, to all organizational structures in order to ensure compliance with the legal framework, including in relation to ESG topics. Also offers legal consultancy to support the development of products complying with sustainability criteria.

### **People, Culture & Organization**

People, Culture & Organization combines human and organizational development. This combination enables a holistic promotion of all aspects related to employees, leadership, culture, and organizational development. Thus, it is a critical partner in implementing the strategy and corporate goals. In addition to compliance with all labour related legal requirements, one of its key objectives is the efficient management of human resources processes such as: personnel data administration, employment contract generation or recruitment. Additionally, it is responsible for personnel development, career management and leadership development, as well as the training and education of employees. Regarding organizational development, it supports all reorganisations and transformations, particularly through change management and organizational design.

### **CFO area (Chief Financial Officer)**

The CFO area plays a pivotal role in sustainability and management reporting for sustainable financing, and ensures effective control, tracking, monitoring, data collection, budgeting and reporting. In this context, it ensures strategic management and supervision in order to ensure that green and social asset reporting is consistent with the Group's objectives. It specifies policies, procedures and framework conditions in order to promote sustainable practices and monitor progress in reaching sustainability targets and identifying potential for improvement. It collaborates with various departments in order to collate relevant information and guarantee data integrity. It incorporates corresponding sustainability-related metrics into Group's budgeting process and together with other departments such as Sustainable Finance, defines targets for the Corporates and Retail business areas.

Furthermore, the CFO area has a co-leading role together with ESG & Sustainability Directorate in the consolidated sustainability statement by ensuring accurate collection and analysis of financial and non-financial data related to sustainability metrics and its disclosure. They collaborate closely with relevant departments and entities to integrate financial information with ESG factors to provide a comprehensive and compliant report.

In future, this will also include information on sustainability-related risks and impacts within the context of annual financial reporting.

### **Green & Sustainable Bonds Program Governance**

The Assets and Liability Committee (ALCO) monitors on a quarterly basis the management of the Green Bond program in line with the Bank's Green Bond Framework (GBF). The main responsibilities in this regard are:

- Governing of the GBF – setting of green bond principles, review and approval of the framework;
- Approval of the green assets to be used as proceeds for any type of green funding, in line with the eligibility criteria from the GBF; monitoring of the use of proceeds;
- Monitoring of the use of proceeds - takes the decision to include/exclude eligible green loans in/ from the eligible green loan portfolio;

- Approval of the annual environmental impact reporting in accordance with the GBF

Starting 2024, Sustainability Steering evaluates the materials for ALCO in relation to the management of the green and social loan portfolio or the Allocation/Impact Report and makes recommendations to ALCO (approval or modification/revision recommendations).

On the corporate side, eligibility criteria are used to determine the eligible green and social loans within the various eligible sectors under the supervision of the Assets and Liability Committee (ALCO). The ALCO represents an extension of the management team. It comprises an extended team of management and experts including CEO, Vice-president Capital Markets, Investment Banking & Personal Financial Planning, , all the other members of the Directorate, Director of the Capital Markets Trading and Sales, Director of Treasury, Director of Group Risk Control and Portfolio Management, Chief Economist, Asset and Liability Manager, Integrated Risk Manager, General Secretary, General Secretary/ Legal and Corporate Governance. Additionally, directors of the business lines, retail and audit may be invited.

## **Chief Risk Officer (CRO)**

### **Compliance**

Compliance Directorate is responsible for Group's compliance framework in line with the three lines of defence model for controlling risk management.

The Compliance function is responsible for a wide range of activities, it is tasked with monitoring legislative and regulatory requirements, among other stakeholders participating in ensuring compliance with applicable regulations and standards, recommends changes and provides opinion to the institution's policies, prepares and recommends follow-up actions, provides advice and checks on the sustainable finance product offering, such as "green" products. The tasks and responsibilities in the second line of defence also encompass mitigation of the risks associated with greenwashing, conflict of interest etc. The Compliance function is represented in relevant committees, e.g. the Sustainability Steering.

Compliance is responsible for a wide range of activities, primarily related to financial sanctions, anti-money laundering, , fraud & bribery, and the prevention of conflicts of interest.

### **Internal Controls**

Internal Controls Area is situated within Compliance Directorate and is responsible for the implementation of the Internal Control System (ICS), reflecting the Bank's related processes/risks/controls approach which is integrated within the overarching three lines of defence model for controlling risk management. The ICS framework is described in an internal regulation and should ensure that the Bank's controls environment provides assurance regarding the effective management of underlying operational risks, financial reporting and compliance with applicable regulatory requirements. This internal regulation aims to comply with the existing legal requirements and with industry leading practices (i.e. Internal Control System Framework).

Through regular risk identification, mitigating control development, documentation, prioritization and periodic independent control testing, the ICS framework is implemented and an appropriate control environment ensured. These activities, the methodology to be applied and the respective responsibility are described in the ICS framework.

In this respect it is stipulated that the first line of defence is responsible for implementing adequate processes, identifying the risks and designing and executing mitigating controls. The second line of defence is responsible for supporting and challenging the first line of defence in assessing risks, designing efficient and effective controls, and validating and reviewing the effectiveness of risk

mitigation and controls. The third line of defence is executed by Internal Audit, which provides independent assurance of the internal control environment and system. The approach supports the selection of relevant business processes, enforces accountability, ensures integration of processes/risks/controls, independence, and segregation of duties.

The activities related to the ICS are periodically reported to the Significant Risk Administration Committee, to the Management Board and to the Audit Committee.

Internal Control regulates the governance structure for Internal Control over financial reporting and sustainability reporting and oversees risks and controls related to financial and sustainability reporting.

### **Group Risk Control and Portfolio Management**

Group Risk Control and Portfolio Management is responsible for identifying and managing portfolio risks by setting risk appetite and monitoring portfolio limits. In hierarchical terms, it reports directly to the CRO.

With respect to ESG risk, the main responsibilities are the integration of ESG risk to the internal capital adequacy assessment framework ICAAP (e.g. risk assessment). It is also responsible for disclosure reporting (EBA ITS), financed emission, green asset ratio, as well as internal ESG risk reporting.

### **Corporate Credit Management**

Non retail Credit Risk Directorate is assigned to the CRO, being responsible for rating analysis and underwriting. In terms of ESG and ESG risks, the directorate fulfils several tasks. It applies a Corporate ESG score model and performs ESG score analysis throughout the credit rating process. The financial analyst evaluates the ESG score of the customer by considering both qualitative and quantitative facts and information. Qualitative facts include the sustainability and annual report, policies, and mitigation aspects the corporate has in place, while quantitative aspects involve quantitative environmental data such as emission data and energy consumption. For the social and governance score, the analyst assesses the entire picture of the company, including the value chain and internal human resources topics. In underwriting, underwriters use the ESG score of the customer and the ESG assessment of the industry, in addition to credit rating aspects, to decide if a loan or limit application can be supported.

### **Chief IT & Operations (COO)**

IT area focuses on the Bank's digital operations and innovations. It is responsible for the IT strategy, digital transformation, and IT governance topics. Key enablers such as cyber security, data management and IT solutions are overseen, and emerging topics such as the integration of AI are managed. In 2024, a special focus was set on sustainable IT, which included a comprehensive IT data collection to understand GHG emissions derived from the use of IT services and goods.

The COO division also includes the Procurement Department and the Logistics Department, whose roles has been detailed previously.

### **Policy frameworks as governance instruments**

The Bank's policy framework for defining internal governance is based on different types of internal regulations:

- Policies, Strategies for the implementation of regulatory requirements and business objectives
- Norms, Procedures, Operational Instructions and their supporting documents detailing the working processes for the implementation of regulatory requirements and business objectives

The Management Board is responsible for ratifying internal regulations as previously approved, updated and cancelled by the Norms and Procedures Committee. The rules stated in the internal policies are binding, unless otherwise stated in the policy itself.

The scope of application is defined for each internal regulation by the respective policy owners and approved by the approval authorities. internal Policies must be followed by all affected employees. S.A.I. Raiffeisen Asset Management S.A. and Raiffeisen Leasing IFN S.A. have their own policies in line with legal requirements and must be followed by all their affected employees.

The Intranet is the standard information platform for the Bank and the official source for internal regulations. All employees that are part of the policy framework can access such data at all times. All Policies must be kept up-to-date by the Policy Authors and Owners and therefore updated in intervals as may be required by applicable law.

## **GOV-2: Information provided to and sustainability matters addressed by administrative, management and supervisory bodies**

The Management Board, the Supervisory Board and relevant committees are informed as part of regular meetings topics about material impacts, risks, and opportunities. These updates are provided by senior management, including the Chief Risk Officer. This regular flow of information aims to ensure that the Management Board, the Supervisory Board and its committees are well-equipped to oversee and guide the Bank's strategy and operations including sustainability impacts, risks, and opportunities effectively.

The Management Board and Supervisory Board duly consider impacts, risks, and opportunities when overseeing the Bank's strategy, decision-making on major transactions, and risk management processes. This involves an evaluation of how these impact, risks and opportunities align with and influence the Bank's long-term strategic goals. When reviewing major transactions and strategic initiatives, the Supervisory Board and relevant committees assess the potential trade-offs associated with various impacts, risks, and opportunities. They ensure that decisions are made with a comprehensive understanding of the benefits and potential drawbacks, balancing short-term gains with long-term sustainability and risk mitigation objectives. The Management Board and the Supervisory Board monitor that strategic decisions and risk management practices are aligned with its sustainability goals. This approach is designed to enable the Bank to address complex challenges while simultaneously seizing opportunities.

In 2024 the Management Board focused on the ESG transformation of business, speed-up of ESG data collection, ESG communication as well as ESG regulatory compliance. In this respect, the Management Board discussed the below mentioned main topics within the reporting period and took the necessary decisions.

Regarding the overall sustainability management, topics on the agenda of the Sustainability Board as dedicated meetings for management board members, including non-financial key performance indicators for Management Board members as mandatory part of their individual performance agreements, non-financial reporting disclosure requirements, regular updates on the CSRD implementation project with a focus on impact, risk and opportunities, the developments and management of ESG data collection.

With respect to overall sustainability management, the Management Board approved in 2024 the ESG & Sustainability Policy.

Within the environmental perspective, the focus of the Management Board was placed on the Bank's financed emissions target, including the business execution plans and client engagement. Additionally, the Management Board was informed and decided on topics pertaining to ESG Risk management such as the ESG Risk framework, the calculation of the financed emissions, and other supervisory and regulatory topics.

With regards to social perspective, the Management Board discussed the results of employee engagement survey for 2024, and received updates on the policy on discrimination and harassment. Own workforce topics on the agenda included executive development for the Group, leadership development, performance & reward, artificial intelligence covering the operating model and the learning and development budget allocation focusing on strategic directions of learning. A training program addressing the prevention of harassment and discrimination was delivered to the entire management group, including Board members.

Cyber security information was discussed with regard to the cyber security strategy and roadmap as well as the information and cyber security status of the Bank. Data privacy related topics included Data Subject Rights (DSR), documentation of legitimate interest assessments and of data protection impact assessments, investigation of data breaches, notification of the relevant authorities, as the case may be, data protection governance. The Bank is conducting an internal program for strengthening data protection and steering is managed by the Board's members.

Regarding the governance perspective, the Management Board discussed for example, an update of the Code of Conduct. In addition, Management Board was provided with regular compliance updates in the areas of anti-money laundering, financial sanctions, compliance governance and controls, financial crime management, capital market compliance and regulatory compliance.

The Management Board members are also kept informed of all potential loss events that fall under operational risk, including legal, IT or compliance.

These areas reflect the Bank's commitment to addressing key sustainability challenges and leveraging opportunities that align with its strategic goals and stakeholder expectations.

### GOV-3: Integration of sustainability-related performance in incentive schemes

Remuneration is based on four underlying principles:

- The remuneration principles promote the business strategy and long-term development of the company and are consistent with the objectives, values and long-term interests.
- Clear and transparent policies concerning remuneration and performance measurement serve to guarantee objective decision-making and ensure that the interests of the employees are aligned to the Bank's long-term interests.
- The remuneration principles are compatible with and instrumental to solid and effective risk management and do not encourage taking risks more than the tolerated level.
- The remuneration principles set out clear responsibilities concerning the definition, review and implementation of the remuneration policy, and define rules to prevent conflicts of interests.

The fixed remuneration is based on predefined criteria. The fixed remuneration includes the base salary, and fringe benefits. With regard to the variable remuneration, the allocation and payment of the respective bonus (if applicable) is subject to the fulfillment of the regulatory and performance-related step-in criteria. The calculation of the bonus amount is based on the two KPIs Return-on-Equity and Cost-Income-Ratio. For each business year, performance targets are set for these KPIs. These targets are then compared to the actual year-end values achieved to determine the overall performance.

The payment of the bonus is made in line with the respective payment model for identified staff, if applicable: depending on the amount of the bonus, at least 40 per cent of the bonus is deferred. Final allocation and payment take place on a pro-rata basis over a period of up to five years. Additionally, half of the total bonus is also granted in the form of non-cash instruments (share-based remuneration in the form of "phantom shares") with a retention period of one year. The value is paid out in cash at the end of the retention period. The number of phantom shares allocated, and the respective (payout) value is calculated on the basis of RBI's average share price for the respective year. No other share-based remuneration is granted. The malus/clawback review is governed as follows: In accordance with the regulatory provisions, ex-post risk adjustment is ensured on the basis of corresponding clawback regulations and agreements as well as an annual review process. If the performance underlying the bonuses granted proves to be unsustainable or there is a deterioration in the company's financial position and results of operations, the deferred remuneration may be reduced by the company or cancelled altogether.

For the financial year 2024, the performance was also evaluated based on sustainability targets in the areas of responsible customers business volume, ESG regulatory requirements, ESG risk management, operational ecology.

For 2024, the climate related considerations factored into the remuneration are defined as the implementation of regulatory requirements, particularly when it comes to CO2 related target setting (at portfolio level).

This is underlined by business KPIs which define the increase of new ESG business volumes and the support of the Bank's customers in their transition pathway. KPIs have also been developed regarding own operations and in-house ecology.

The individual performance criteria include financial performance criteria (quantitative, weighted at a minimum of 40%) and non-financial performance criteria (quantitative and qualitative, weighted at a maximum of 60%). The non-financial performance criteria should appropriately reflect the business strategy and may relate, for example, to the achievement of strategic objectives (such as implementation of strategic projects, measures to increase efficiency and optimize processes, innovation), customer satisfaction, compliance with risk management policy, adherence to governance and compliance regulations, employee engagement, and the leadership qualities of the board member. Furthermore, criteria related to the company's social responsibility, including environmental factors, should be used.

The achievement of a minimum score for overall performance is seen as mandatory step-in criterion for bonus eligibility. If all step-in criteria have been achieved the bonus process continues with the calculation of the bonus amount. The specific bonus is calculated on the basis of the degree of fulfillment of the KPIs as defined in the remuneration policy.

## Approval process and governance

Subject	Remuneration Committee	Supervisory Board	Annual General Meeting
Remuneration policy (including review and performance management principles for the Management Board	Recommendation	Decision	
General remuneration principles for Management Board and Supervisory Board) for the implementation of regulatory requirements		Recommendation	Decision
Individual performance targets for the Management Board		Decision	
Individual performance appraisal and bonus amount for the Management Board	Recommendation	Decision	
Management Board contracts		Decision	

The Supervisory Board/ Remuneration Committee are primarily responsible for monitoring the remuneration policy. It regularly monitors the remuneration policy, remuneration practices and remuneration-related incentive structures, in each case in connection with the management, monitoring and limitation of risks in accordance with the legal requirements, as well as capital adequacy and liquidity, taking into account the long-term interests of shareholders, investors and employees as well as the economic interest in a functioning banking system and financial market stability.

The decision as to whether a "malus" or clawback event has occurred in accordance with internal guidance on remuneration policy and what consequences such an event has with regard to the payment of variable remuneration is made by the Supervisory Board/ Remuneration Committee.

Internal control functions are to be appropriately involved in the preparation, implementation and review of the remuneration policy in accordance with the legal requirements. A central and independent internal review is to be conducted at least once a year to determine whether remuneration practices have been implemented in accordance with the remuneration policy established by the Supervisory Board and/or the Remuneration Committee. Where necessary, recourse is made to independent external consultants to support the structuring and supervision of the remuneration policy.

## GOV-4: Statement on due diligence

The financial services sector itself has for years been confronted with many challenges and risks. In order to remain profitable over the long term, these challenges call for a strong culture of risk management and sustainability. Compliance with appropriate due diligence processes is therefore of particular importance. The following overview provides information on which sections of the current consolidated sustainability statement contain the core elements of due diligence, i.e., the procedures conducted, or processes implemented to identify actual and potential negative impacts on the environment and people in connection with our business activities.

Core elements of due diligence	Paragraph in sustainability statement
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	ESRS 2 GOV-3-Integration of sustainability-related performance in incentive schemes
	ESRS 2 SBM-3-Material impacts, risks and opportunities and their interaction with strategy and business model
b) Engaging with affected stakeholders in all key steps of the due diligence	GOV-2 – Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	SBM-2 – Interests and views of stakeholders
	IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities
	E1-2 – Policies related to climate change mitigation and adaptation
	S1-1 – Policies related to own workforce
	S1-2 – Processes for engaging with own workers and workers' representatives about impacts
	S4-1 – Policies related to consumers and end-users
	S4-2 – Processes for engaging with consumers and end-users about impacts
	G1-1- Corporate culture and G1-1 Business conduct policies and corporate culture
G1-2 – Management of relationships with suppliers	
c) Identifying and assessing adverse impacts	ESRS 2 SBM-3-Material impacts, risks and opportunities and their interaction with strategy and business model

Core elements of due diligence	Paragraph in sustainability statement
	IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities
d) Taking actions to address those adverse impacts	Respective sections on management of impacts, risks, and opportunities
e) Tracking the effectiveness of these efforts and communicating	E1-4: Targets related to climate change mitigation and adaptation S1-5: Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities

## GOV-5: Risk management and internal controls over sustainability reporting

The consolidated sustainability statement was created in collaboration between ESG & Sustainability Directorate and Accounting Directorate, as well as the individual relevant divisions. Data collection was carried out in the respective divisions (including Group Risk Control and Portfolio Management, ESG & Sustainability, People, Culture & Organization, Facility Management). Once the consolidated sustainability statement is completed, it is submitted as part of the Administrators Report to the Board of Management and Supervisory Board for review and final approval.

A balanced and comprehensive consolidated sustainability reporting is a priority for the Group and its governing bodies, requiring compliance with all statutory requirements. The Management Board establishes and defines an internal control and risk management system for the entire accounting process including in the future the process for the consolidated sustainability reporting within the company-wide ICS framework. This system is designated to ensure effective, continuously improving controls, as well as adherence to guidelines and regulations to prevent any unintentional misstatements.

Two risks can arise and will be further documented related to consolidated sustainability reporting: the risk of overlooking material topics, leading to an incomplete report, and the risk of inaccurate data. To mitigate the first risk, a materiality assessment is conducted before report preparation (see chapter SBM-3: Material impacts, risks and opportunities and their interaction with the strategy and business model. ensuring all relevant topics are identified and addressed. There is a second risk that incorrect data is input into the sustainability report. To cover this risk, the report's contents are subjected to dual controls within the respective divisions.

### Risk framework

Risk management is essential for implementing the ESG strategy and the associated risk control measures. ESG is part of the entire risk organization.

The Bank gears its business model to the high-level strategic goal of creating long-term value in line with the principles of responsible banking and regulatory requirements. In concrete terms, it identifies, acknowledges, and aligns the continuous development of its risk management approach with the additional risks originating from ESG.

Initially, the focus was on tackling climate and environment-related risks (transition and physical risks). In the meantime, social and governance aspects are also gaining increasing importance (as further described in the risk management approach).

ESG-related risks have been accounted for by enhancing the existing classical four pillars of risk management on multiple operational levels:

- Identification and definition of ESG risks
- Measurement, methodologies and analytics
- Steering approaches, reflecting risks and opportunities
- Risk processes and governance

ESG-related topics are addressed in dedicated areas within the Risk Division, ensuring integration into operational activity. The aim is to meet the regulatory requirements and at the same time to align the measures with the Bank's business model, with a focus on the corporate business.

When referring to the traditional four pillars of risk management, which are the foundation of the the Bank's risk management approach, it focuses on addressing, quantifying, managing and further integrating the respective risks, as well as the opportunities. The progress is measured via the regular monitoring and establishment of internal ESG KPIs. The main topics reflected within each pillar are highlighted below :

I. Identification & definition of ESG risks	II. Measurement methodologies & analytics	III. Steering approaches, reflecting risks & opportunities	IV. Risk processes and governance
<ul style="list-style-type: none"> <li>Climate-related and environmental risks</li> </ul>	<ul style="list-style-type: none"> <li>Use of metrics for measurement of ESG on a customer and portfolio dimension:</li> </ul>	<ul style="list-style-type: none"> <li>ESG risk policy statement</li> <li>ESG Risk framework</li> </ul>	<ul style="list-style-type: none"> <li>Credit processes enhancement</li> </ul>
Identifying risks according to: <ul style="list-style-type: none"> <li>Climate change</li> </ul>	<ul style="list-style-type: none"> <li>Environmental, Social and Governance score</li> <li>Green Asset Ratio</li> <li>Financed GHG emissions</li> </ul>		<ul style="list-style-type: none"> <li>Prevention of liability, reputational and greenwashing risk in the design phase</li> </ul>
<ul style="list-style-type: none"> <li>Social risks</li> </ul>		<ul style="list-style-type: none"> <li>ESG risk framework</li> </ul>	
<ul style="list-style-type: none"> <li>Governance risks</li> </ul>			

The ESG risk framework is intended to ensure implementation across the four risk management pillars, offering a high-level overview and guidance for ongoing and planned risk management activities. These actions are motivated by the expectations of internal and external stakeholders. The Bank reviews the framework on a regular basis, updated to the latest available trends and future expectations, and approved by the Management Board.

### Identification of ESG risks

Proper identification, definition and understanding of ESG risks are crucial. In the first phase, the Bank has placed particular focus on climate-related and environmental risks, although social and governmental risks are also gaining increasing attention in internal risk initiatives. An initial qualitative and expert-driven approach has been further supported by quantitative assessments including impact analysis, materiality assessments and financed emissions calculations.

The definition of ESG risks and the transmission channels to traditional risk types are explained in more detail in the following chapter. Specific employee categories were trained with regard to environmental and social risk management.

Calculating financed emissions helps the Bank in identifying the most carbon-intensive industries in its non-retail portfolio; a more detailed description and results are included under the chapter [E1-6: Gross GHG emission of categories Scopes 1, 2 and 3 as well as total GHG emissions](#).

### Environmental risk

Climate and environmental risks are driven by environmental factors (E risks). In the outside-in view, these risks should be understood as the financial risks posed by the Bank's exposures to counterparties that may potentially contribute to or be affected by climate change or adaptation, and other forms of environmental degradation (such as air pollution, water pollution, scarcity of fresh water, land contamination, biodiversity loss and deforestation). Related to this, the Bank and its customers have to comply with additional political and social demands, otherwise the Bank's portfolio may face additional risks relating to physical damage or transition.

As such, E risks can result in additional capital requirements, expenditures and potential losses of revenue, which may lead to a deterioration in the respective credit standing and therefore have an adverse effect on the business, financial position and results of its operations. Further information on the different climate-related risks, and their transmission channels to the traditional risk types (market, liquidity, credit and operational risks) can be found in the section on the assessment of the materiality of climate and environment-related risks.

### Social and governance risks

These risks are addressed in the Bank's internal risk framework, building on the existing structure and internal information. The Bank is therefore continuously updating and refining its approach to measure these risks and aligns itself with the latest industry standards.

- Social risks arise from the financial impact generated by the misuse of human capital, e.g. regarding the rights, well-being and interests of people and communities. This could refer to working conditions, health and safety, employee relations and diversity, employee training, inclusiveness, equality or community programs. Regarding all E, S and G-related topics, the Bank also includes the local conditions.
- Governance risks refer to the governance practices of the Bank's counterparties, including the inclusion of ESG factors in policies and procedures under the governance of the counterparties. This may include, but is not limited to, executive pay, board diversity and structure, bribery and corruption, compliance, ethical standards (e.g. data ethics), fair tax strategy, etc.

## Measurement methodologies & analytics

This chapter focuses on data creation, collection and data sourcing. For details see chapter [Sources of estimation and outcome uncertainty](#).

## Steering approaches, reflecting risk and opportunities

Due to its market position the Bank takes responsibility to redefine and reshape its business in line with the latest market and regulatory requirements. Commitments have been made in the areas of thermal coal, nuclear power, arms and war material, and gambling. Efforts have also been taken to define the approach to industries with high CO<sub>2</sub> emissions and/or high negative impacts on by developing sector-specific policies.

An overview of the existing policies related to climate change mitigation and adaption can be found in chapter [E1-2: Policies related to climate change mitigation and adaptation](#).

## Risk processes and governance

The Management Board is the most senior decision-making body for ESG-related strategies, policies and commitments.

From a risk management and supervision perspective, environmental, social and governance (ESG) risks are viewed as cross-dimensional risks that affect all areas of risk management. As such, the ESG risks have been included in the risk framework and methods as drivers of existing risk types. The materiality assessment described in separate chapter is to be adapted accordingly in the coming years as methodologies and common practices are further developed. Each relevant risk department (market, operational, liquidity and credit risk) is responsible for measuring environmentally driven risks over each specific time horizon (long term, short term and medium term). The risk framework and processes are continuously updated, refined and adjusted to the current standards. In the identification and management of environmental factors and risk, the Bank aims to make use of market best practice and implement methods in line with applicable international benchmarks. Most importantly, for the Environmental risk the Bank bases its scenario analysis, which also feeds into the Materiality assessment of Climate and Environmental Risks, on the NGFS-Framework (network for greening the financial system), and the scenarios developed by NGFS to work out various transitions that are in line with the EU's climate change objectives. Also when assessing Physical risks, the impact is evaluated under different transition scenarios in line with the NGFS framework. In addition to this, the Bank's reduction targets on financed emissions have been set to be in line with the EU 2030 targets (see Chapter [E1-1: Transition plan for climate change mitigation](#)).

The main tools for managing and supervising environment-related risks as of year-end 2024 are:

- Environmental, social and governance score
- Green Asset Ratio (GAR)
- Financed GHG emissions
- Raiffeisen Bank International ESG Rulebook, as implemented in the Bank's procedures
- ESG Risk framework
- ESG Risk policy statement

Regarding specific reporting, ESG risk reports are continuously being developed. Reports currently implemented include: the financed emission calculation, physical risk assessment/vulnerability, energy efficiency distribution, exposure towards top polluters, ESG rating distribution and GAR results report.

## Strategy

### SBM-1: Strategy, business model and value chain

Key elements of strategy that relate to sustainability matters

#### Bank's understanding of sustainability

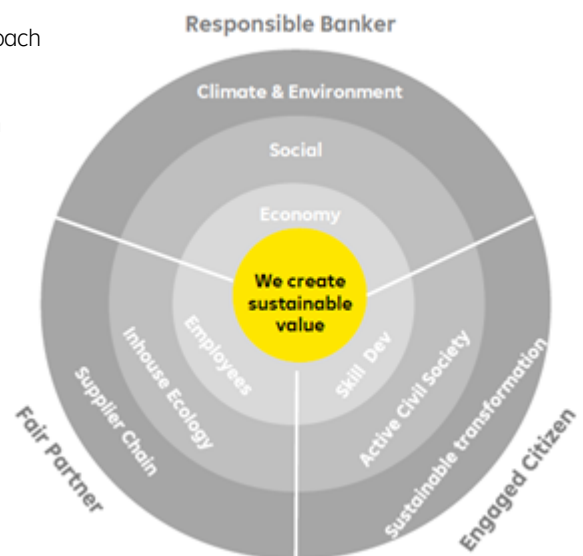
Sustainability is a fundamental principle for Raiffeisen Bank International and a measure of corporate success. For over 130 years, it has combined financial success with socially responsible action.

- The Bank understands sustainability to mean responsible corporate activities for a long-term, economically positive result in consideration of key societal and environmental aspects. (see also chapter [G1-1: Corporate Culture](#)).
- The Bank combines financial success with social responsibility by anchoring sustainability as a fixed component of its business and by practicing sustainability as an integral leadership and management responsibility, in addition to taking key sustainability aspects into consideration in its business activities.
- The Bank is therefore committed to aligning the management structures and processes with this attitude. In the three strategic sustainability areas of responsibility, responsible banker, fair partner, and engaged citizen, which are closely linked to the business activities. The Bank endeavors to professionally and effectively apply the values and competences to fostering sustainable development both within the organisation and in society.

In the ESG & Sustainability Policy the Bank has formulated the strategic approach to pursuing sustainability and its intent to integrate into business activities.

The goal is to concentrate on those areas which have a significant impact on the economy, the environment and people. This requires us to continuously improve the positive impacts of the business activities while reducing the more negative aspects and develop ways to measure and verify both. This approach aims to increase the Bank's long-term value while also actively contributing to the sustainable development of society.

Sustainability is part of the Bank's business strategy. A sustainability strategy with concrete goals is a necessity primarily arising from new regulations, expectations of supervisory authorities and the demands of investors, customers and society. Consumers are demanding more and more sustainable products and services. Employees are demanding more from companies and choosing their jobs based not only on a company's core values, but also on its actual impact and results.



#### Bank's sustainability strategy

In order to improve the effectiveness and scope of sustainability management across the whole organisation, the Bank has approved a sustainability strategy with a focus on climate and environment: The Bank aims to deliver sustainable value by allocating resources across three pillars supported by strong governance and expertise. This strategy consists of three strategic action areas: responsible banker, fair partner and engaged citizen. The action priorities are continuously developed further, taking into account the perspective of stakeholders as well as the local context and national strategy.

#### Core action areas of the Bank's sustainability strategy

How do we build value	What do we focus on
<b>Responsible banker</b>	
stimulating economic growth while taking into account climate, environmental and social aspects in core business.	aligning the portfolio with the goals of the Paris Agreement Supporting our customers climate & environmental transition
<b>Fair partner</b>	
building fair and transparent partnerships with relevant internal and external stakeholders and reducing the environmental footprint.	In-house ecology Employees
<b>Engaged citizen</b>	
supporting the ecosystem of communities who engage in the transition to sustainability.	impact in Communities

The most effective leverage for a bank is in its core business, namely in granting loans. The Bank takes the greatest possible care to structure its business and business relationships for long-term resilience, to avoid social and environmental risks and to take advantage of opportunities to improve environmental protection and social standards. Trust and reliability have always formed part of the Bank's fundamental principles.

The Bank aims to achieve measurable positive impact within the framework of a sustainable transformation. Accordingly, it aligned to Raiffeisen Bank International's set science-based CO2 targets and follow the local ESG regulations and its sustainable pathway. The management of its business activities supports Raiffeisen Bank International's activities that are guided by the Principles for Responsible Banking. The Bank pursues a sustainable business strategy that evaluates the positive and negative ESG impacts of its business activities, sets goals for improvement, adapts its product and service offerings, ensures holistic governance and culture, conducts stakeholder engagement process, and reports transparently the Bank's endeavors to support its customers in their transition to a sustainable future, in particular with regard to climate and the environment.

The Bank aims to gradually implementing qualitative and quantitative criteria in order to integrate its sustainability strategy into its business processes. This is intended to enable it to manage the portfolio sustainability and to reduce interactions with companies that do not meet its climate and environmental criteria and/or our economic expectations, or that do not pursue any transition pathway.

As a responsible banker, the Bank focuses to support our customers in their climate and environmental transition. Customers are encouraged to work on a targeted basis towards improving their climate and environmental performance by developing and following a transition pathway. The Bank also offer customers extensive ESG expertise and practical and innovative sustainable financial products and services, thereby contributing to increasing the proportion of climate-friendly transactions.

The sustainability strategy is subject to reviews, where the Bank consider, for the responsible banker pillar, both scientific advances and the updated ESG findings from its portfolios, as well as the transformation progress made by its customers. Given that its customers and stakeholders are from a very diverse range of sectors, not all elements of the strategy can be fully applied to each sector, and some elements may have to be adapted to the respective level of the sectors and profile.

The responsible banker pillar from the Sustainability Strategy supports Raiffeisen Bank International voluntary commitments and is consistent with the regulatory requirements.

Firstly, is focused on aligning its portfolio with the goals of the Paris Agreement. The Bank analyses the impacts of the weak points and the opportunities presented by its business activity from a climate and environmental perspective. In doing so it considers climate and environmental factors in lending decisions, risk and operational control, and when allocating resources. It will also increase the use of assets for sustainable financing products. In 2024, it took further steps by setting emissions targets which were approved by the Management Board. For more details, please refer to chapter [E1-4: Targets related to climate change mitigation and adaptation](#).

Secondly, we focus on supporting the Bank's customers on their journey towards a climate and environmental transition. Thus, offering its professional expertise to its corporate and institutional clients as well as its retail customers, along with practical and innovative financial products and services.

Furthermore, the Bank is driving forward the transition to sustainable financing, based on current ESG expertise and ESG governance. In order to make a credible contribution to the climate and environmental transition it is crucially important for it to develop, maintain and pass on expert knowledge. The establishment of a series of ESG policies and appropriate governance (e.g. the ESG risk framework or the process to prevent greenwashing) are a key element of its strategy and support it in its endeavours.

## **Corporate & institutional clients business**

The Bank serves around 5,100 corporate clients in Romania (including medium-sized businesses, large local companies, international corporations and local authorities) as well as local and international institutional clients. Its product range encompasses a broad spectrum of tailored solutions in the areas of finance, capital market and foreign exchange risk hedging as well as an extensive selection of transaction banking solutions (payment services, trade and export finance).

The Bank offers support for various sustainable financing formats options aligned with the business model and sustainability strategy of its customers. These sustainable financing options cover a wide range of financial instruments (bonds, syndicated loans, bilateral facilities, etc.) characterized by their linkage to ESG ratings or sustainability targets, or by demonstrating proof of sustainable use of funds).

The's sustainable finance experts support corporate and institutional customers in their transformation by identifying and defining sustainable transactions. The basis for this assessment of financial products and services includes both regulatory framework and the international market standards such as those of the Loan Market Association and the International Capital Markets Association. The Bank supports its customers in verifying the suitability of various projects and activities with regard to

EU Taxonomy compliance and the Bank's internal definitions of green, social or sustainable transactions. When engaging in dialog with customers on ESG-linked products, it is especially important to jointly define material KPIs that are important for the customer's sustainability and business strategy. When establishing the annual target values, care is taken to ensure a certain degree of ambition and that the ESG KPIs represent a significant improvement in the customer's sustainability position.

Sustainable financial products can be tailored to the individual customers so that they have a positive impact in terms of ESG criteria. The Bank supports customers in all sectors – in critical sectors such as oil and gas, and through to non-critical sectors such as renewable energy – and in doing so, addresses each individual customer's respective challenges and opportunities. With all sustainable financing transactions, the sustainable finance experts always endeavor to provide corporate and institutional customers with a clear understanding of market standards and requirements, as well as best practices.

The Bank supports customers during financing transactions:

- In all roles – as arranger, book runner, sustainability structuring advisor and lender
- through various financing instruments, such as loans, guarantees
- In various forms of sustainable financing, including sustainability-linked and ESG rating-linked formats as well as formats where the financing is primarily dedicated to sustainable investments

In addition to sustainable finance, it supports its customers on the EU Taxonomy (where applicable), subsidized financing and corresponding subsidy programs in Romania.

## **Retail business**

The Bank provides services to around 1,87 million private individuals, private banking and small business customers, offering a broad product range (e.g. account packages, and payment services, consumer finance, mortgage loans and investment products). In Romania, the Bank performs investment advisory and asset management distribution for selected retail customers.

Responsible banking also evolved further in the retail strategy. The Bank focused on supporting its customers in their green transition. It developed solutions which aim at better understanding customers' carbon footprints and provided products with a reduced environmental impact that allow retail customers to receive a superior supply of sustainability-oriented solutions. The Bank aims to further increase new green loan sales to private individuals and small-business customers.

## **Business on investment products**

On the investment side, the Bank is preparing to re-launch the investment advisory services for Private Banking clients only which will include also ESG funds, certificates and bonds, which form the flagship product line. However, there is also a focus on green bonds for institutional clients. In 2024, the funds business saw a significant expansion in volumes and new products. We have added two ESG funds to our ESG offering (bringing the total number of ESG funds offered to 13). We have also restarted the distribution business of certificates and corporate bonds product lines in Private Banking and Premium Invest segments. The still high interest rate environment increased the attractiveness of fixed income instruments, which enabled the product range of sustainable funds to be extended towards lower risk categories targeting more risk-averse customers.

## **Leasing business**

The's leasing business covers four main categories - cars, trucks and other vehicles (electric railway locomotives), forklifts and other equipment, photovoltaic plants for corporate own use (cooperation with relevant partners). There has been growth in the level of ESG transactions in all business categories and the outlook prioritizes car leasing, especially e-vehicles, in cooperation with vehicle manufacturers. E-trucks might become an important driver in the future. The long-term goal for the leasing business remains to increase ESG-eligible new business volumes year on year.

## **Societal aspects in the core business**

Considering societal aspects in the core business and thus knowing and incorporating the societal needs of customers and end consumers is important to the Group. Responsible sales practices and marketing are not only strictly regulated but are part of the stakeholder approach for fair business and sales practices. Complying with the legal requirements of protecting customer data and data security in general is an integral part of the processing of banking business. The Group Code of Conduct stipulates in writing that the Group treats its customers with respect and does not discriminate against them.

This is ensured through various initiatives and the provision of products and services across different channels. Please also see the chapter on Consumers and end-users referring to social inclusion.

## **Significant operating segments**

In order to achieve the maximum possible transparency and in the interest of clearer lines of reporting, segments were defined in accordance with the IFRS 8 requirements. The operating segments are classified in accordance with note 43 Segments consolidation as described in the consolidated financial statements.

According to ESRS it is necessary to report information related to an undertaking's own operations and its upstream and downstream value chain, including its products and services, its business relationships and its supply chain. The Group's main business model is to provide banking services to corporate customers and retail customers in Romania. Although deposit and lending activities are the main focus of activity, leasing, asset management, and investment banking services are also offered by the Group.

### **Description of the upstream value chain**

The upstream value chain of the Bank consists of the financial liabilities which are borrowed as deposits or issued as bonds or equity. These products are a source of financing for the Group, which are used to fund the activities of customers. However, the funding and liquidity risk impact of sustainability matters on own operations is considered. Money invested by customers in investment and pensions funds is not considered part of the upstream value chain. A further part of the upstream value chain is considered to be the suppliers of goods and services the Group purchases in order to carry out operating activities.

### **Description of the downstream value chain**

The main downstream key value chain of the Bank consists of the on-balance sheet financial assets which are lent or leased to customers and financial investment activities of the Group. These products are a source of financing for customers and investees in their activities, leading to positive or negative sustainability outcomes. Here the key value chain relates to lending to corporate customers which has the greatest impact materiality. An additional key element of the sustainability related value chain relates to lending to retail customers. Lending to sovereigns, and financial institutions or investments with central banks, which are primarily for liquidity purposes are not considered as an important sustainability related value chain. Nevertheless, where market convention has been established to include additional information on lending to sovereigns and financial institutions (e.g. partnership for carbon accounting finance) information is provided.

A second downstream key value chain consists of assets under management in investment and pension funds. These products are a source of financing for investees in their activities, leading to positive or negative sustainability outcomes. Here only investment activity where the Group employees have direct operational control of the investment process are considered to be part of the value chain. This means third party funds, where there is no direct operational control of the investment process and the possibility to look-through to the underlying assets is limited are not considered part of the value chain.

The following activities in the downstream value chain activity which the Bank does not consider material are not considered:

- Cash and cash equivalents most of which is held at central banks or in other financial institutions.
- Exposure from trading assets and liabilities which due to their short-term nature are not considered, however sustainability risks for market risk are considered as part of own operations in ESRS E1 climate change.
- Non-consolidated associates are considered for the purposes of scope 3 paragraph 15 financed emissions to the extent that in-house data is available, however not for other aspects of the value chain.
- Non-consolidated investees where no operational control exists are neither considered for the purposes of financed emissions nor for other aspects of the value chain.
- Investment property is not included due to the non-core nature of the business, nevertheless, own use property and its impact on climate change is considered as part of the in-house ecology section in ESRS E1 climate change.

Value chain information is currently provided to the extent that the Group has ready access to the information. In future we expect to have access to more information as the CSRD develops.

## **SBM-2: Interests and views of stakeholders**

In identifying the core action areas, the Group relies on the perspectives of the stakeholders. The Group carries out a multi-stage materiality analysis on a regular basis in order to prioritize these fields of activity. For this reason, as well as for the purpose of making any adjustments to the sustainability strategy, the Group places great value on maintaining a dialog with its stakeholders.

### **Stakeholder Engagement Approach**

The Group organizes its stakeholder engagement through a decentralized approach, where various units engage with stakeholders based on their specific areas of expertise and operational focus. This model ensures that interactions are relevant

and directly aligned with the specific topics and issues at hand. Each subsidiary of the Group is responsible for managing its own stakeholder interactions, tailored to the context of specific stakeholder groups.

While the execution of stakeholder engagement is decentralized, the Bank maintains mechanisms, such as a stakeholder dialogue database organized by ESG & Sustainability Directorate, to collect and consolidate information from all units for reporting. This ensures effective documentation and monitoring of engagement activities across the organization.

The purpose of stakeholder engagement is to ensure that the interests and views of stakeholders are adequately considered in the company's strategy and business model. Engaging with stakeholders allows the Bank to:

- **Gather Insights and Feedback:** This helps the company understand stakeholder expectations and concerns, supporting decision-making and corporate strategy development.
- **Identify and Address Material Issues:** This ensures that the company's strategy and initiatives are aligned with stakeholder interests and that critical issues are particularly taken into account.
- **Support Sustainability Goals:** Through stakeholder engagement, the Bank can promote the implementation of its sustainability goals.
- **Enhance Transparency and Accountability:** Stakeholder engagement promotes transparency and accountability by providing stakeholders with information about the Bank's activities, performance, and future plans.
- **Foster Collaboration and Partnerships:** This enables the Bank to work with its stakeholders to address and solve common challenges, share best practices, and achieve mutual benefits.

## Stakeholder categories

The Bank defines its stakeholders as those people or groups of people that have a legitimate interest in the company through their direct or indirect business activities. Stakeholders are therefore primarily:

- **Employees & Employees Representatives/ Trade Unions:** The Group workforce, whose skills, engagement, and well-being are fundamental to operational effectiveness. This includes employee representative such as union representing the interests of employees in discussions with management, ensuring fair labor practices. Examples: Full-time staff, part-time staff, contractors employer and employee representatives.
- **Clients:** Individuals or organizations that purchase or use Group 's products and services, whose satisfaction and loyalty are crucial to business success. Examples: Corporate customers, private customers, SMEs
- **Regulatory authorities/ Government agencies/ Policy makers:** Government bodies and regulatory institutions that oversee and enforce compliance in the banking and financial sector, directly impacting the Bank's operations and strategy. Examples: National Bank of Romania (BNR), Financial Supervisory Authority (ASF), Ministry of Finance.
- **Shareholders/owners:** Individuals or entities that own shares in Group and have a vested interest in the company's financial performance and governance. Examples: Private and institutional investors
- **Supranational organization/ Investors/ Rating agencies:** International financial institutions and organizations that provide funding, investment opportunities, and assess the Bank's creditworthiness and performance. Examples: European Investment
- **Bank (EIB), International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD), Moody's, S&P Global**
- **Supplier/Business Partners:** Entities with which the Bank collaborates, including suppliers and service providers, essential for the supply chain and business operations. Examples: consultants, auditors, suppliers
- **NGOs, Civil Society:** non-governmental organizations and community groups that advocate for social, environmental, and economic issues relevant also for the Group's operations (including those that serve as proxies for silent stakeholders - nature may be considered as a silent stakeholder - amplifying the voices of ecosystems, biodiversity, and local communities affected by the Group's activities). Examples: environmental groups, social justice organizations
- **Business/ Sector associations :** Industry groups or associations that the Bank is a part of, which provide a platform for collaboration. Examples: ARB, CPBR, RBL etc.
- **Media:** News organizations, journalists, and media outlets that report on the Bank's activities, influence public perception, and shape the bank's reputation in the market. Examples: Financial newspapers, business TV channels, online news platforms, social media influencers
- **Other categories (e.g., former & potential clients, other individuals/ organizations) - various stakeholder groups that interact with or have an interest in the Bank's activities.**

## Stakeholder impact topics and engagement tools used

The Group can generate significant impact (be it positive or negative) through our business and operations and it can also be significantly influenced in terms of risks and opportunities by our stakeholders and their actions. Identifying relevant stakeholders and engaging in transparent, open communication with them is key to building strong and sustainable business. Thus, we mapped our stakeholders' categories along with the potentially impact topics in relation with them and the engagement instruments used as follows:

stakeholder category	engagement methods/ instruments	engagement frequency	ESRSs covering potentially material topics*
Employees & Employees Representatives/ Trade Unions	Surveys on working conditions, career opportunities, payment, diversity & inclusion, etc Internal communication platform & campaigns Online/offline events/ workshops/ trainings Regular briefings All staff meetings on the progress of the company presented by the bank management Committees Negotiations (CLA)	Ongoing	ESRS S1, ESRS G1
Clients - Private individual	Direct interactions with bank's customer relationships employees Online platforms/ programs Surveys to identify perceptions on bank products & services, interactions, business model, etc. Complaints/ Grievances/ Suggestions channels	Ongoing	ESRS S1, ESRS S2, ESRS S3, ESRS S1
Clients - SME	Ongoing communication through bank's customer relationships employees Online and offline events/ programs/ platforms Surveys to identify perceptions on bank products & services, interactions, business model, etc. Complaints/ Grievances/ Suggestions channels	Ongoing	ESRS S2, ESRS S4, ESRS S3, ESRS G1, ESRS E1- E5
Clients -Corporate	Ongoing communication through bank's customer relationships employees Online and offline events/ programs Studies, analyses & reports Surveys to identify perceptions on bank products & services, interactions, business model, etc. Complaints/ Grievances/ Suggestions channels	Ongoing	ESRS G1, ESRS S2, ESRS S3, ESRS S4, ESRS E1- E5
Regulatory authorities/ Government agencies/ Policy makers	Regular consultations Public policy and legislative proposals feedback Inspections, audits, controls, verifications, monitoring Public and special reports Online and offline events Surveys	Regularly Whenever necessary	ESRS E1- E5, ESRS G1, ESRS S4
Owners/ Shareholders	Online/offline meetings/ workshops/ events Regular briefings & reporting Annual Reporting Committees Audits Projects & programs Internal communication platform & campaigns	Ongoing	ESRS E1- E5, ESRS G1, ESRS S1, ESRS S2, ESRS S3, ESRS S4
Supranational organization/ Investors/ Rating agencies	Partnerships and ongoing dialogue Regular on-line/ offline meetings & consultations Annual Reporting Audits Surveys & questionnaires Published studies and reports	Regularly Whenever necessary	ESRS E1 - E5, ESRS S1, ESRS S2, ESRS S3, ESRS G1
Suppliers/ Business partners	On-line/ offline meetings Surveys/ consultations Studies & reports	Annually Whenever necessary	ESRS G1, ESRS S2, ESRS S3, ESRS S4, ESRS E1- E5
Civil society / NGOs	Building partnerships, programs, projects Surveys/ consultations Online/ offline events Studies & reports	Regularly Whenever necessary	ESRS G1, ESRS S3, ESRS S4, ESRS S2, ESRS E1- E5
Business/ Sector associations	Regular consultations & roundtables Direct involvement in specific activities Online/ offline events & meetings Surveys, studies & reports	Regularly Whenever necessary	ESRS E1 - E5, ESRS S4, ESRS G1, ESRS S1
Media	Regular consultations Online/ Offline press (media) events Press releases/ Interviews Surveys, studies, analyses & reports	Regularly Whenever necessary	ESRS S4, ESRS E1 - E5, ESRS S1, ESRS G1
Other categories (e.g., former & potential clients, other individuals/ organizations)	Surveys to identify perceptions on bank products & services, interactions, business model, etc. Online and offline events & programs Direct talks with bank employees Complaints/ Grievances/ Suggestions channels	Annually Whenever necessary	ESRS E1 - E5, ESRS G1, ESRS S4, ESRS S3, ESRS S1

\*based on internal stakeholders assessment mapped on ESRS topical standards

The Group continuously evaluates the interests and views of its stakeholders to ensure alignment with its strategy and business model. The Group remains committed to effectively integrating stakeholder insights into its decision-making processes.

The Bank has established a Sustainability Steering, which plays an important role in stakeholder dialogue and sustainability management. This steering group informs the Sustainability Board, which includes members who are also part of the Bank's board management, about the views and interests of key stakeholders.

This steering guides the Bank's strategic direction concerning economic, environmental, and social issues, ensuring stakeholder concerns are reflected in the company's policies.

Most of the input considered by the Sustainability Steering is gathered through various stakeholder interactions throughout the year, including industry roundtables, working groups, conferences:

- In October 2024, the Bank was partner for the Sustainability Inspiration Day, a conference which presented ways on how the concept of sustainability can be translated into concrete actions. Key discussions focused on sustainable finance directives, circular economy integration, and technological solutions supporting the transition to low-carbon business models.
- In November 2024, the Bank participated at Biodiversity Day hosted by Raiffeisen Bank International, a focus day on nature and biodiversity in banking sectors. The event gathered 100+ participants, including representatives from UN Environmental Program for Financial Institutions, and international ESG experts, consultancies, and NGOs.
- In January 2024, the Bank participated at "Circularity in action", an event that brought together the public and private sectors, under the coordination of IFC and Prime Minister Office, to jointly discuss the foundations for a future in which the principles of the circular economy are incorporated into the socio-economic system of Romania.
- In May 2024, the Bank organized Cereal expert, an annual event dedicated to corporate clients in the agribusiness sector. Through collaboration with industry experts, Bank representatives, and key stakeholders, it contributed to a meaningful dialogue on advancing sustainable agricultural practices and innovative solutions for the sector's development.
- In March 2024, the Bank participated at New Economy & Society: Innovative financial solutions for social equity: From Financial Inclusion to Systemic Change a roundtable organized by Aspen with key public decision-makers, private sector leaders, and representatives from academia and civil society to identify challenges and opportunities in Romania.
- In September 2024, the Bank participated at internal Financial Inclusion Summit held by Raiffeisen Bank International focused on advancing best practice solutions regarding financial inclusion within Raiffeisen Bank International.
- In 2024, through its stakeholder engagement efforts, the Bank distributed questionnaires to its NGO partners using the London Benchmarking Group (LBG) methodology to systematically evaluate the impact of its CSR portfolio. This approach enabled the Bank to better understand and respond to the needs of its community partners and beneficiaries.
- In June 2024, the Bank participated in the second edition of the Gender Equal Financing Conference 2024, organized by the Romanian Diversity Chamber of Commerce, contributing to discussions on advancing gender equality in business financing. The conference provided a valuable platform for exploring the potential of women-led businesses and their economic impact, while also emphasizing the importance of financial education in supporting women entrepreneurs.
- Throughout 2024, the Bank actively participated in key industry roundtables and working groups, demonstrating its commitment to sustainable development and social inclusion. At the Romanian Association of Banks round table on green finance, the Bank engaged in discussions regarding industrial financing for green transition, aligning with Romania's ambitious climate neutrality goals and the National Recovery and Resilience Plan. Additionally, the Bank contributed to the Working Group on Diversity, Equal Opportunities, and Inclusion at the Embassy of Sustainability, where it engaged in discussion regarding initiatives for the employability of vulnerable people. These collaborative platforms enabled the Bank to contribute to the development of industry guidelines and best practices while staying informed about emerging sustainability trends and regulatory requirements.
- In April 2024, the Bank partnered with the Embassy of Sustainability in Romania to support 'Journalists for Sustainability,' a training program designed to enhance media coverage of sustainability topics. Through this initiative, the supported the creation of a learning and dialogue platform for journalists, contributing to positive change while helping mitigate misinformation in sustainability reporting.

The Group uses different formats to actively integrate the interests and views of its employees into its strategic framework. For additional information, please refer to section [S1-2 Processes for workforce engagement and representation regarding impacts](#)

Customers are at the center of the Group's strategy, and respecting their interests, opinions and rights is the basis of its entire business approach. Therefore, the Group implements a diverse range of mechanisms for consulting and integrating customer perspectives into decision-making and strategic processes, ensuring a permanent link with the market and its needs. For additional information, please refer to section [S4-2 Processes for workforce engagement and representation regarding impacts](#).

The insights from customer feedback are incorporated into the development of products and services to ensure they align with clients interests and to mitigate potential risks related to over-indebtedness and the handling of financial services.

## Affiliations

The Bank harness its participation in different organizations and associations at business community and market level as part of its stakeholders' engagement. Its membership in such organizations is presented in the table below:

<b>Banking Industry</b>	<b>Participation type</b>
Romanian Banking Association (ARB)	Membership / Dedicated programs #dreptullabanking
Association for Electronic Payments Romania(APERO)	Membership
Council of Romanian Banking Patronages (CPBR)	Membership
Romanian Factoring Association (ARF)	Membership
Factors Chain International (FCI)	Membership
International Capital Market Association (ICMA)	Membership
Association of Fund Administrators from Romania (AAF)	Membership
<b>Business Associations</b>	<b>Participation type</b>
AmCham	Membership /Working groups/ Event
ASPEN Institute	Membership /Dedicated programs - "New Economy & Society Program"
Austrian Business Club	Membership (individual contributors)
Concordia	Membership via CPBR - BAC
Foreign Investors Council (FIC)	Membership
German Banat Economic Club Association (DWK)	Membership
Romanian Business Leaders (RBL)	Membership for RB & Individual contributors x 6 (regional included)
<b>Chambers of Commerce</b>	<b>Participation type</b>
Chamber of Commerce German – Romanian (AHK)	Membership
The Chamber of Commerce Switzerland – Romania (CCER)	Membership/ Partner at events
Chamber of Commerce and Industry of Romania (CCIR)	Membership
International Chamber of Commerce (ICC) via CCIR	Membership
Romanian-French Chamber of Commerce (CCIFER)	Membership
Romanian-Dutch Chamber of Commerce (NRCC)	Membership
<b>Other registrations</b>	<b>Participation type</b>
Romanian Diversity Chamber of Commerce (RDCC)	Membership/ Events/ Extended support
Romania Green Building Council (RoGBC)	Membership
Coalition for Romanian Circular Economy (CERC) - NGO	Membership
Romanian Sustainable Investment & Finance Association (ROSIF)	Partner at events

## Consideration of Stakeholder Engagement Outcomes

The Group collects and analyzes the opinions and perspectives of stakeholders, integrating this information into its business strategy and decision-making processes. Thus, the Group ensures that the interests and views of stakeholders are taken into account, supporting the long-term development of the company.

## Inclusion of Stakeholders in Materiality Assessment

Building upon its stakeholder identification process initiated in 2017 and revalidated in 2020 and 2021, in 2024 the Bank updated its stakeholders' mapping based on reviews with internal stakeholders during the Double Materiality Assessment workshops and as part of internal discussions for preparing the sustainability reporting. This process focused particularly on mapping the material topics initially identified in relation with each stakeholder category to ESRS topical standards, on identifying new stakeholders' categories if the case, and on aligning with the Raiffeisen Bank International general approach.

For the Group, understanding the interests and views of its key stakeholders is fundamental to aligning its strategy and business model with stakeholder expectations.

The Bank conducts a comprehensive materiality assessment to identify and prioritize issues that are most relevant to both the company and its stakeholders. The selection of material topics is guided by the regulatory requirements of the European Sustainability Reporting Standards (ESRS).

The Bank's long standing experience in analyzing and identifying material topics from previous reports based on GRI standards supports and enhances the quality of the due diligence and materiality assessment process. Feedback mechanisms, such as surveys and workshops, along with evaluations of discussions held with individual stakeholder groups are vital sources for understanding stakeholder interests.

## Next Steps

The Group plans to continue its regular stakeholder engagements and materiality assessments to identify areas for potential improvement. These ongoing efforts are essential in staying responsive to stakeholder needs and emerging trends, enabling the organization to adapt effectively within the evolving regulatory landscape.

Also, it will monitor and evaluate the effectiveness of its stakeholder engagements and make necessary adjustments. Regular reviews of internal ESG policies, ensure continuous improvement and alignment with best practices.

By continuously considering stakeholder feedback, it aims to strengthen its stakeholder relationships and ensure that their interests are adequately considered. This is expected to increase trust and transparency.

## **SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business**

The Group faces specific challenges in its efforts to realize its sustainability vision. These arise from the economic, social and environmental impacts of Group's business activities as well as from the external conditions within which it operates. The Group works within an environment that is characterized by numerous economic, geopolitical and environmental risks. In the consolidated sustainability statement, it addresses the sustainability topics that have been identified within the Group as

material, that reflect the expectations of its stakeholders, and that represented the focus of its engagement in 2024. This statement contains information describing the specific impact of the Group on the economy, environment and people. The sustainability topics elaborated in the statement are the result of the double materiality assessment.

In financial year 2024, the Group performed a double materiality assessment based on the principles and requirements formulated in the ESRS. For an overview of how the assessment was performed, please refer to the chapter [IRO-1: Process to identify and assess material impacts, risks and opportunities](#). The assessment showed the topics through which the Group has been or is connected to a material impact on people or the environment (impact materiality) and the topics that now, or may in the future, have a material financial effect on the Group (financial materiality).

## Description of material impacts, risks and opportunities

The outcomes, including both the material topics from own operations as well as from the value chain, are shown below:

ESRS topic	ESRS subtopic	ESRS sub-sub-topic	IRO short name	IRO description	IRO type	Business model	Value chain	Response in strategy decision-making	Time horizon	Stakeholder	
Climate change (E1)	Climate change mitigation (E1)	n/a	CO <sub>2</sub> emission reduction	Climate change mitigation focuses on reducing greenhouse gas emissions to slow the pace of global warming. This involves transitioning to low-carbon technologies and energy sources which can introduce various transitional risks. Lending to high-carbon industries and fossil fuel projects can undermine efforts to reduce emissions, perpetuating reliance on polluting energy sources and delaying progress towards climate goals. Risks can include potential financial losses from climate-induced market instability and asset devaluation, and increased credit defaults from impacted borrowers.	Financial risk	Non-retail; retail;	Downstream through lending business	Constantly striving to align its portfolio to the goals of the Paris Agreement and improve customer experience, enabling its clients to achieve more in their transition.	Medium long-term	Internal retail and experts, customers	Non-retail
Climate change (E1)	Climate change mitigation (E1)	n/a	CO <sub>2</sub> emission reduction	Climate change mitigation focuses on reducing greenhouse gas emissions to slow the pace of global warming. This involves transitioning to low-carbon technologies and energy sources which can open various transitional opportunities in terms of capital need. Lending to industries and sectors and financing their efforts to reduce emissions is both a business opportunity and a contribution to progress towards climate goals. Business development opportunities are considered in financing green buildings with low-carbon technologies and other green assets while significantly contribute to reduce overall greenhouse gas emissions.	Financial opportunity	Non-retail;	Downstream through lending business	Constantly striving to align its portfolio to the goals of the Paris Agreement and improve customer experience, enabling its clients to achieve more in their transition.	Medium long-term	Internal retail and experts, customers	Non-retail
Climate change (E1)	Climate change energy (E1)	n/a	CO <sub>2</sub> emission reduction	Negative impact generated mostly by financing real-estate sector (on-going GHG emissions from building operation, potentially high energy & water consumption, possible GHG emissions linked to heating, siting and accessibility that contribute to urban sprawl - access is predominantly by private cars) and by financing non-renewable energy projects can slow the transition to sustainable energy, locking in carbon-intensive infrastructures and increasing long-term environmental and economic risks.	Potential negative impact	Non-retail; retail;	Downstream through lending business	Constantly striving to align its portfolio to the goals of the Paris Agreement and to improve customer experience, enabling its clients to achieve more.	Medium long-term	Non-retail and experts, customers	retail
Climate change (E1)	Climate change energy (E1)	n/a	CO <sub>2</sub> emission reduction	Energy-related initiatives involve both physical and transitional risks as they intersect with climate adaptation and mitigation strategies and regulatory frameworks. Risks can include potential financial losses from climate-induced market instability, asset devaluation, and increased credit defaults from impacted borrowers. Both energy prices and business dependency on fossil fuels and non-renewable energy may generate negative effects on lending business and assets	Financial risk	Non-retail; retail	Downstream through lending business	Constantly striving to align its portfolio to the goals of the Paris Agreement and improve customer experience, enabling its clients to achieve more in their transition.	Medium long-term	Internal retail and experts, customers	Non-retail
Climate change (E1)	Climate change mitigation (E1)	n/a	Climate-fit operations - own operations	Own operations have a negative impact on the climate through GHG (scope 1-2 own emissions and scope 3 supplier's emissions), mainly from energy consumption, business travel and material consumption; insufficient information on sustainability initiatives of suppliers being available.	Actual and potential negative impacts		Own operations upstream (suppliers) &	Energy efficiency, business-travel & fleet emissions reduction, renewable energy purchase - sustainable and efficient operations model	Short-term and long term	Internal Suppliers, Employees	experts,

ESRS topic	ESRS subtopic	ESRS sub-sub-topic	IRO short name	IRO description	IRO type	Business model	Value chain	Response in strategy decision-making	Time horizon	Stakeholder
Climate change (E1)	Climate change adaptation (E1)	Climate change – own operations	Adaptation to risks (natural and governance) – own operations	Impact of re-modelling/renovating of buildings to adapt to different climate conditions; lifespan of assets may be impacted; energy and procurement prices may be impacted.	Actual and potential negative impacts		Own operations upstream (suppliers)	Stress testing and adaptation measures, cost control measures and business model profitability	Short term and long-term	Internal Suppliers, Employees, experts,
Climate change (E1)	Climate change energy (E1)	n/a	Sustainable operations – own operations	Cost savings through reduced consumption due to energy efficiency initiatives for own buildings, potential subsidies for renewable energy, energy and procurement prices may be positively impacted, better image and market positioning as direct opportunities from energy perspective.	Opportunity		Own operations upstream (suppliers)	Sustained growth: business growth and business model profitability	Medium to long-term	Internal Suppliers, Employees, experts,
Circular economy (ES)	Resource inflows	n/a	Resource use – own operations	By developing circularity targets including % of recycled plastic cards and virtual cards (that will eliminate the use of plastic) own operations resources inflows can be positively influenced on short term. By implementing a new Procurement Policy, the ESG and circularity-oriented suppliers and local and resource-efficient industries can be supported over long term. Managing resource inflows, e.g., of IT infrastructure, especially hardware, can also positively impact CO <sub>2</sub> footprint.	Actual and potential positive impact		Own operations upstream (suppliers)	Sustained growth: business growth and business model profitability	Short and long-term	Internal Suppliers, Employees, experts,
Circular economy (ES)	Resource inflows	n/a	Resource outflows	Negative impact generated through financing activities, has effects in term of resources outflows related to products and services as waste generation and concurring to environmental strain.	Actual negative impact	Non-retail; retail	Downstream through lending business	Constantly striving to improve customer experience, enabling its clients to achieve more in their circular economy practices	Short-term	Internal experts, Non-retail and retail customers
Circular economy (ES)	Resource outflows	n/a	Resource outflows	Negative impact generated through financing activities, has effects in term of resources outflows related to products and services as waste generation and concurring to environmental strain.	Actual negative impact	Non-retail; retail	Downstream through lending business	Constantly striving to improve customer experience, enabling its clients to achieve more in their circular economy practices	Short-term	Internal experts, Non-retail and retail customers
Own workforce (S1)	Working conditions	Secure employment	Employee relationship	Secure employment enhances financial stability and employee satisfaction and is achieved by offering permanent employment contracts with comprehensive benefits including pension fund contributions, maintained income during the first 6 months after birth of a child, internal mobility opportunities, and severance pay protection.	Actual potential positive impact	& Primarily employees in administrative branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees
Own workforce (S1)	Working conditions	Working time	Employee relationship	Flexible scheduling fosters employee well-being, and is implemented this through collective agreements, monitored overtime control, flexible working hours, and part-time arrangements mostly for mothers after maternity leave, until the child is 2 years old or if the specifics of activities allow this.	Actual potential positive impact	& Primarily employees in administrative branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Medium-term, medium-term	Employees
Own workforce (S1)	Working conditions	Adequate wages	Employee relationship	Competitive compensation drives current employee satisfaction and supports successful talent retention and is achieved by adhering to a policy on fair pay principles, thus ensuring that remuneration is in line with employees' tasks and responsibilities and performance.	Actual potential positive impact	& Primarily employees in administrative branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees
Own workforce (S1)	Working conditions	Social dialogue	Employee involvement	Active dialogue creates balanced decision-making through diverse perspectives. The Code of Conduct encourages proactive staff engagement and professional opinions, supported by Labor Union representation and collective agreements.	Actual potential positive impact	& Primarily employees in administrative branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees

ESRS topic	ESRS subtopic	ESRS sub-sub-topic	IRO short name	IRO description	IRO type	Business model	Value chain	Response in strategy decision-making	Time horizon	Stakeholder
Own workforce (S1)	Working conditions	Freedom of association	Employee involvement	Works councils strengthen employee awareness of rights through an active local staff council and alignment with legal regulations.	Actual potential positive impact	& Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, medium-term	Employees
Own workforce (S1)	Working conditions	Collective bargaining	Employee relationship,	Standardized working conditions ensure workplace fairness. The labor union represents employees in collective agreement negotiations, with regular communication of meeting outcomes.	Actual potential positive impact	& Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees
Own workforce (S1)	Working conditions	Work-life balance	Employee development, Health	Work-life balance initiatives improve satisfaction through hybrid working, flexible benefits, wellbeing workshops, health programs, development opportunities etc.	Actual potential positive impact	& Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, long-term	Employees
Own workforce (S1)	Working conditions	Health and safety	Mental and physical health enablement	Safety measures and training enhance workplace security are achieved by implementing a comprehensive Health and Safety Management Systems. It ensures that all visitors, contractors, and workers from outside the organization who carry out activities under a service contract are trained in accordance with the legislation in force.	Actual potential positive impact	& Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Long-term, long-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Diversity, equity and inclusion	Fair compensation and balanced leadership drive employee engagement, productivity, and loyalty are achieved by ensuring equal treatment in salary and career development with active gender pay gap monitoring, while tracking gender balance across Executive Board, Supervisory Board, and management positions. All employment types receive standardized benefits governed by the Remuneration Policy and Collective Bargaining Agreement. The company offers, along with fixed benefits, customizable benefits packages that employees can select at regular intervals, ensuring flexibility and personalization of benefits according to individual needs.	Actual potential positive impact	& Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Medium-term, medium-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Diversity, equity and inclusion	Equal treatment and fair pay practices enhance employee retention and satisfaction, while attracting diverse talent that drives stronger company performance and innovation.	Opportunities	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	1) long-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Training and skills development	Employee development	Robust learning opportunities enhance satisfaction and career progression are achieved by comprehensive training through multiple channels including onsite, offsite, and eLearning platforms, supported by trainee programs and structured career development plans. Performance management includes regular reviews. Each business area receives a yearly training budget allocation, and employees are entitled to 4 dedicated learning days annually.	Actual potential positive impact	& Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Training and skills development	Employee development	Need for high expertise, as limited expertise raises the innovation costs.	Financial risk	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Medium-term	Employees

ESRS topic	ESRS subtopic	ESRS sub-sub-topic	IRO short name	IRO description	IRO type	Business model	Value chain	Response in strategy decision-making	Time horizon	Stakeholder
Own workforce (S1)	Equal treatment and opportunities for all	Employment and inclusion of persons with disabilities	Diversity, equity and inclusion	Inclusive practices strengthen organizational belonging and development opportunities, and are achieved by actively monitoring workforce disability representation and implements barrier-free access measures. The company maintains a dedicated Diversity policy and committed to anti-discrimination and anti-harassment through a dedicated policy, accompanied by mandatory yearly anti-discrimination training for all employees.	Actual & potential positive impact	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Employment and inclusion of persons with disabilities	Diversity, equity and inclusion	Creating an inclusive workplace culture expands talent pool and client relationships, while fostering long-term employee commitment and positive organizational reputation.	Opportunities	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	long-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Measures against violence and harassment	Diversity, equity and inclusion	Unaddressed harassment and violence could create psychological pressure and physical health risks for employees, leading to absenteeism and loss of qualified staff. It can reduce work quality, and deteriorating team cooperation and communication.	Actual & Potential negative impact	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, short-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Diversity	Diversity, equity and inclusion	Diverse workforce improves organizational performance through enhanced decision-making. A Diversity Officer is appointed as the central point of contact and implemented comprehensive D&I initiatives coordinated by People Culture and Organization. These include workshops covering parenting, burnout, neurodiversity, harassment prevention, disability inclusion awareness, and intergenerational cooperation.	Actual & potential positive impact	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	Short-term, medium-term	Employees
Own workforce (S1)	Equal treatment and opportunities for all	Diversity	Diversity, equity and inclusion	Building diverse teams strengthens decision-making quality and operational efficiency, while boosting employee satisfaction and position the company as an attractive, forward-thinking employer.	Opportunities	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	long-term	Employees
Own workforce (S1)	Other work-related rights	Privacy	Protection of personal data	Proper data privacy handling fosters trust and ensures personal information is secure. Poor data privacy practices can lead to breaches, causing stress and loss of trust.	Actual & Potential negative impact	Primarily employees in administrative and branch offices	Own operations	People & culture: attractive employer and high-performing working culture	short-term, short-term	Employees
Consumers and/or end-users (S4)	Information-related impacts for consumers and/or end-users	Privacy	Protection of personal data	Privacy breaches can trigger regulatory fines, damage reputation, reduce customer trust, increase operational costs, and result in lost business opportunities. The bank focuses on implementing the necessary information protection measures, both by technical means and by administrative controls based on best practices in the field.	Actual & potential negative impact	Retail	upstream and own operation	Privacy new technologies	Short-term, short-term	Private (consumers) individuals
Consumers and/or end-users (S4)	Information-related impacts for consumers and/or end-users	Access to (quality) information	Access to (quality) information	Customers gain deeper understanding of financial products, enabling confident decision-making and improved loan repayment planning.	Actual & potential positive impact	Retail	Downstream	Sustained growth / customer centricity	Short-term, long-term	Private (consumers) individuals

ESRS topic	ESRS subtopic	ESRS sub-sub-topic	IRO short name	IRO description	IRO type	Business model	Value chain	Response in strategy decision-making	Time horizon	Stakeholder
Consumers and/or end-users (S4)	Information-related impacts for consumers and/or end-users	Access to (quality) information	Access to (quality) information	Create interactive educational platforms and simplified product comparison tools to become a trusted financial advisor, driving customer loyalty. Access to quality banking information is enhanced through a comprehensive approach that includes multi-channel delivery (online, mobile – Smart Market & Smart Mobile, and in-branch), interactive financial planning tools ( Smart Finance platform- for private individuals and SME), and financial educational content.	Opportunity	Retail	Downstream	Sustained growth / customer centricity	Long-term	Private individuals (consumers)
Consumers and/or end-users (S4)	Social inclusion of consumers and/or end-users	Non-discrimination	Non-discrimination	Discriminatory practices may trigger regulatory penalties, increase loan defaults, damage reputation, and lead to reduced market share and revenue loss. The Bank strives to avoid discrimination and make its products and services accessible to people with special needs on an ongoing basis	Potential financial risk	Retail	Downstream	Customer centricity: superior customer experience based on data excellence and deep customer understanding	Medium-term	Private individuals (consumers)
Consumers and/or end-users (S4)	Social inclusion of consumers and/or end-users	Access to products and services	Access to products and services	Access barriers lead to unequal service availability, limiting customer financial options and potentially causing losses through constrained banking choices. To mitigate negative financial impact as much as possible, various measures have been taken, such as a barrier-free branch access or website adaptation for people with visual impairment.	Actual & potential negative impact	& Retail	Downstream	Customer centricity: superior customer experience based on data excellence and deep customer understanding	Short -term, Medium-term	Private individuals (consumers)
Consumers and/or end-users (S4)	Social inclusion of consumers and/or end-users	Responsible marketing practices	Responsible marketing practices	Transparent and responsible marketing practices enhance customer satisfaction by enabling informed financial decisions through clear communication of terms, conditions, and costs. These aspects are reflected in the business strategy, particularly in product governance, distribution strategy, handling of customer information, management of conflicts of interest, and complaint management.	Actual positive impact	Retail	Downstream	Efficiency / sustained growth	Short-term	Private individuals (consumers)
Consumers and/or end-users (S4)	Cyber security & resilience	Cyber security resilience	Cyber security & resilience	Robust cybersecurity systems currently maintain customer confidence by ensuring secure transactions and protecting sensitive financial data, while safeguarding employees and business processes from security incidents.	Actual & potential positive impact	& Retail	Downstream	Cyber security; speed and adaptability – high adaptability to rapidly changing market developments and harnessing new technologies	Short-term, medium term	Private individuals (consumers)
Consumers and/or end-users (S4)	Cyber security & resilience	Cyber security resilience	Cyber security & resilience	Enhanced security measures strengthen market position through increased customer trust and operational resilience, while creating competitive advantage in digital banking services. The top priority is to protect customers against all forms of cyber-attacks. A Local Security Council (LSC) and an information security policy are in place and through the security measures applied, it strictly complies with both national information security regulations and European legislative frameworks.	Opportunity	Retail	Downstream	Cyber security; speed and adaptability – high adaptability to rapidly changing market developments and harnessing new technologies	Medium-term	Private individuals (consumers)
Business conduct (G1)	Corporate culture	Corporate governance and strong ethical compliance	Culture integrity of	Building and sustaining a strong culture of integrity and acting in line with organizational values is reducing the behavioral risk and protecting its reputation, as well as keeping a positive workplace and a sustainable business growth. Sense of belonging; positive workplace practices may lead to better personal and professional growth and "best place to work" perception.	Positive impact	Primarily employees in administrative and branch offices. Suppliers. Non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short to medium-term	employees business partners competitors national authorities/ regulators

ESRS topic	ESRS subtopic	ESRS sub-sub-topic	IRO short name	IRO description	IRO type	Business model	Value chain	Response in strategy decision-making	Time horizon	Stakeholder
Business conduct (G1)	Corporate culture	Corporate governance and strong ethical compliance	Culture of integrity	Conversely, a potential weak culture of integrity promotes unethical and in compliant behavior, which is substantially affecting the bank's reputational risk. Such an environment makes employees as well as customers feel insecure and unstable. Employees feel uncomfortable/insecure/unstable in the working environment or feel difficult to work in an unappropriated corporate context, considering their need for autonomy, potentially affecting employer branding.	Negative impact	Primarily employees in administrative and branch offices. Suppliers. Non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short to medium-term	employees business partners competitors national authorities/regulators
Business conduct (G1)	Protection of whistleblowers	Protection of whistleblowers	Protected whistleblowers	Whistleblowing enhances transparency and accountability both inside and outside the company while maintaining good workplace ethics. Proper management of whistleblowing and retaliation processes is essential to prevent severe psychological stress.	Actual positive impact	Primarily employees in administrative and branch offices. Suppliers. Non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short-term	employees, whistleblowers business partners/community national authorities/regulators
Business conduct (G1)	Corruption and bribery incidents	Corruption and bribery incidents	Corruption incidents	Corruption incidents can have negative consequences on social cohesion and strengthens distrust in society.	Actual negative impact	Primarily employees in administrative and branch offices. Suppliers. Non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short-term	employees, business partners competitors national authorities/regulators
Business conduct (G1)	Corruption and bribery incidents	Corruption and bribery incidents	Corruption incidents	On the other hand, disclosing information regarding incidents is strengthening awareness of corruption issues and preventing possible corruption or bribery practices.	Actual positive impact	Primarily employees in administrative and branch offices. Suppliers. Non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short-term	employees, business partners competitors national authorities/regulators
Business conduct (G1)	Entity-specific	Money laundering and counter-terrorism	Prevent money laundering and counter terrorism	Conversely, effective management enhances public safety and satisfaction and strengthens the economy.	Actual positive impact	Suppliers. Retail, non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short-term	business partners competitors national authorities/regulators
Business conduct (G1)	Entity-specific	Money laundering and counter-terrorism	Prevent money laundering and counter terrorism	Mismanagement of money laundering and counter-terrorism efforts can increase criminal activities, terrorist risks, and jeopardize public safety and the economy	Actual negative impact	Suppliers. Retail, non-retail, assets under management	Own operations, upstream and downstream	Governance: strong risk governance	Short-term	business partners competitors national authorities/regulators
Business conduct (G1)	Management of relationships with suppliers including payment practices	Fair partner to suppliers	Fair partner to suppliers supporting high ESG standards	Unfair or late payment practices generate social inequalities and can affect the economic environment. Supporting suppliers with poor environmental and social performance due to more favorable financial terms have social consequences over time.	Actual and potential negative impact	Suppliers	Upstream	Efficiency / sustained growth	Short and medium-term	Suppliers

The double materiality assessment revealed that most of the material impacts, risks and opportunities were in the lending portfolio. For further details regarding the Group's value chain, please refer to the chapter [SBM1: Definition of value chain](#). This is not a new outcome as the previous materiality assessments, based on internationally recognized criteria and sustainability standards, current laws and regulations, had already revealed that responsible financing on a broad range of ESG topics represented a main source of value creation or depletion for the stakeholders. The double materiality assessment will be revalidated annually and if imposed by the context re-evaluated in a semi-regular process, which will be updated in the upcoming years. If a topic is currently not material, it could become material in the future.

## Impact, risk and opportunity management

### IRO-1: Process to identify and assess material impacts, risks and opportunities

In the consolidated sustainability statement, the Group addresses the sustainability topics that have been identified within the Group as material, that reflect the expectations of the stakeholders, and that represented the focus of its engagement in the past year.

The double materiality assessment process is used to identify and assess material Impacts, Risks, and Opportunities (IROs) based on the principle of double materiality, serving as the basis for the entire sustainability disclosure. This assessment ensures that the consolidated sustainability statement covers all topics and sub-topics with the greatest current or potential positive and negative impacts related to the Group's business activities, products, and services. This includes impacts directly attributable to the Group within its operations, as well as those to which it contributes through business relationships with other entities. Additionally, the risks and opportunities relevant to the Group in connection with these matters, or those that arise from its business activities or relationships, are also presented.

The first double materiality assessment in accordance with ESRS was carried out and was conducted with the help of internal workshops starting with December 2023. The double materiality assessment process was performed separately for own operations and the value chain. This process was used to separate the effects the Group has through its own bank operations from the effects it has through its value chain.

For the double materiality assessment, internal topic experts assessed direct impacts, identifying relevant impacts, risks, and opportunities within their areas of expertise. External stakeholders have been involved through various channels in the Bank's materiality analysis for many years and their input is collected and considered by the internal subject matter experts when assessing the topics. As example, the Bank participates in national working groups, to discuss material topics. ESG experts continuously monitor developments in ESG-related topics, which influence the Group's materiality assessment.

### Identification of ESRS touchpoints

#### Own operations

The initial assessment for own operations was based on the list of potentially material topics according to ESRS 1 AR 16 data points and was expanded by adding company-specific topics. This included 10 topics (five environmental topics, four social topics, one governance topic), and the relevant sub-topics, as well as sub-sub-topics. In individual workshops, all internal stakeholders were familiarized with ESRS and received an introduction to the double materiality assessment. The goal was to enable the experts to review the list and to adapt them, based on their expert opinion. The list of relevant touchpoints was presented, reviewed, and adapted by the internal stakeholders. In subsequent workshops, the list, already populated with suggestions from sustainability experts from the Bank, was completed with potentially significant topics in collaboration with the relevant departments or completed with company-specific topics. If no touchpoint was identified, the topic was taken as not material and documented accordingly.

The internal stakeholders with ESG expertise from various departments are responsible for the topics mentioned below and conducted the materiality analysis.:

- Compliance
- Finance & Treasury
- Personal Data Protection and Governance
- IT Core & Banking Security
- Marketing, Communication and Customer Experience (including CSR and Public Affairs)
- People, Culture & Organization (PCO) and employee representatives
- Logistics & Procurement
- Operations
- Risk
- Corporate
- Retail (Small and Medium Enterprises & Private Individuals)
- Selected Subsidiaries

The main responsibility for the double materiality assessment lay with the CSRD implementation project team, which is a cooperation of finance and sustainability experts. |

## Benchmark analysis

A benchmark analysis was also conducted, examining sustainability information (websites, sustainability statements) from relevant competitors regarding their engagement with these topics. The analysis provided additional insights into how the sustainability topics may be assessed and addressed for the sustainability report and were discussed within the ESG governance structure.

## Assessment workshops

In subsequent assessment workshops, the list with the touchpoints was completed with potentially significant topics in collaboration with the relevant departments or completed with company-specific matters. At the beginning of the assessment workshops, the workshop participants were introduced to the double materiality analysis method according to ESRS. As part of this introduction, the evaluation methodology and the construction of the scales used to assess the impacts, risks, and opportunities of the topics were elaborated.

For actual negative impacts, materiality was based on the severity of the impact, while for potential negative impacts it was based on the severity and likelihood of the impact. For factors such as scale, scope irremediability, and probability of occurrence a four-step scale was used to measure the severity of the impact ranging from one (very low) to four (high). The likelihood of occurrence of a sustainable topic was also assessed for risks, opportunities, and potential impact using a four-step scale, from one (very unlikely) to four (likely). The same likelihood scale was used for the probability of occurrence for financial materiality and impact materiality.

For the financial risks and opportunities assessment, a sustainability matter is considered material from a financial perspective if it triggers or is expected to trigger significant financial effects on the undertaking. This determination used factors such as the continuation of resource use, dependence on relationships, and other elements that influence the future value of the company. For risks and opportunities deemed relevant to the Group, the time horizon for potential occurrences was defined before analyzing how these risks and opportunities could impact the factors used. Additionally, the probability of occurrence was assessed.

During the workshops, the identified ESRS topics were subsequently evaluated for their positive and negative effects, and for each impact, additionally assessed for potential and actual impacts. Actual impacts are those that have already occurred, while potential impacts are those that could occur in the future. Initially, the origin of the impact (whether directly or indirectly caused by the Bank), the location (where the expected impact could occur), and the time horizon in which the impacts are likely to occur were assessed. Subsequently, a quantitative evaluation was conducted to determine the extent.

## Value chain

### Impact materiality assessment

The portfolio's impact materiality assessment was conducted using the United Nations Environment Programme – Finance Initiative (UNEP FI) Impact Analysis Tool. This tool, developed in collaboration with signatories of the Principles for Responsible Banking (PRB) and UNEP FI member banks, provides a framework for assessing the impacts associated with financial portfolios. By using this methodology, the Group evaluates the indirect impacts of its portfolio on sustainability priorities aligned with the European Sustainability Reporting Standards (ESRS).

For the analysis, the Bank's portfolio was segmented by business line — non-retail and retail (mortgage portfolio), — and described in terms of industry sectors (NACE), country of operation, exposure at default (EAD), and booking country.

To assess how these portfolio elements impact sustainability topics, UNEP FI mappings are used to connect sector and geographic data to ESRS sub-topics. The sector-impact map highlights how industries influence specific impact areas — positively or negatively, directly or indirectly — and these impact areas are then mapped to ESRS sub-topics to connect portfolio impacts to ESRS standards. Adding country-specific needs data gives the analysis a geographic layer, helping to prioritize sustainability topics based on regional importance.

The impact calculation applies three measures: scale, scope, and irremediability. Scale quantifies the monetary exposure (EAD) of sectors that directly affect ESRS sub-topics through UNEP FI impact areas. Scope adjusts scale by factoring in geographic relevance, reflecting country-specific needs that influence the priority of each topic. Irremediability then provides a qualitative assessment of the reversibility or permanence of these impacts, with higher scores indicating sectors or regions where impacts are challenging to mitigate.

These three measures — scale, scope, and irremediability — combine to create an overall impact score for each ESRS sub-topic. This score serves as the basis for the double materiality analysis, following ESRS guidelines. A materiality threshold of two-thirds (66.7 per cent) is applied to determine which ESRS topics are considered material and should be prioritized. The quantitative score

can also be adjusted using qualitative inputs such as stakeholder feedback or contextual insights, ensuring a more holistic assessment of the portfolio's indirect impacts.

## **Financial materiality assessment**

### **Financial materiality from risks in the value chain**

According to ESRS, it is necessary to report information related to an undertaking's own operations and its upstream and downstream value chain, including its products and services, its business relationships, and its supply chain. The financial materiality of risks is assessed based on a combination of the likelihood of occurrence and the potential magnitude of the financial effects. For the likelihood of occurrence, factors such as current and future legislation as well as reputational considerations are considered. For the purpose of the CSRD, the income dependency of the Bank's downstream value chain was used to assess the magnitude of the financial materiality of the topical standards (and sub-topics).

When the income dependency of a topical standard is greater than ten per cent and it is likely there will be an impact, this provides confirmation of financial materiality. The income dependency ratio is defined as (income from high-impact lending/investing) divided by (operating income and add-back interest expense and fee expense).

The income from high-impact lending/investing currently consists of the following positions:

- Interest income from non-financial corporations
- Interest income from retail mortgage loans
- Fee and commission income from non-financial corporations
- Fee and commission income from investment funds/pension funds

Financial materiality in the value chain currently applies to Climate change (E1).

### **Financial materiality from opportunities in the value chain**

Based on the importance of sustainable business within the ESRS standard E1 – Climate change, it can be seen that business opportunities are identified as financially material for the Group. Therefore, it is imperative for the Group to integrate sustainable business practices into its core operations, as this not only mitigates risks but also presents lucrative business opportunities.

## **Validation of double materiality assessment**

At the beginning of the validation process, the preliminary results were compared by the CSRD implementation project team against sector-specific criteria outlined in the Global Reporting Initiative (GRI) and previous GRI materiality assessment results.

The above-mentioned thresholds set for the impact materiality and financial materiality (risks and opportunities) were presented and acknowledged by the Sustainability Steering and approved in the Sustainability Board. If the impact materiality and/or financial materiality of an ESRS topic exceeded the set threshold, it was considered material and was included in the consolidated sustainability statement for 2024.

The results of the direct double materiality assessment were presented together with the indirect double materiality assessment (see point 2.2.) and recognized by the Management Board. A summary of the outcome of the double materiality assessment is presented in the chapter [SBM-3: Material impacts, risks and opportunities](#) and their interaction with the strategy and business model.

## **Topic-specific disclosure requirements**

### **Climate change**

#### **Own operations**

#### **Impact materiality assessment**

In terms of the Group's own operations, the double materiality principle means understanding and taking into account the impact of a company's own activities on the environment and the impacts of environmental issues for the respective company.

At the Group, the key materiality indicator is the volume of absolute greenhouse gas emissions (scopes 1-3) that are caused by various activities, such as energy consumption and business trips. These emissions have an adverse impact on the climate and are therefore considered, even though the main focus rests on Group's financed emissions due to their much larger weight. Although

the impact of greenhouse gas emissions on the climate is entirely negative, aspects such as the use of renewable energy and the promotion of energy efficiency can mitigate the adverse effects.

### **Financial materiality assessment**

The risks of operational activities are closely related to the environmental concerns set out to be managed in the CSRD. The biggest risk to the economy, society and the environment is the unwillingness of companies to counteract climate change. Which leads to increased global warming with the known negative impacts. In addition to external environmental risk, the Group is subject to physical, regulatory and reputational risks (outside-in perspective). In the area of physical risks, for example, natural disasters could result in damage to property. These risks are minimized by selecting the right locations and ensuring suitable property insurance (adaptation strategy).

These risks are managed by continuously observing the internal and external environment and by consulting specialists in controlling the respective measures. Risks are classified as material when they endanger the achievement of medium to long-term RBI climate targets that the Group supports—or when stakeholders classify them as material for the Group. The measures set out are currently heavily focused on the area of energy, with examples including targeted increases in energy efficiency and renewable energy use.

The Group is making a positive contribution to society with concrete steps relating to environmental management. The Group is contributing to meeting the goals of the UN climate change conference in Paris (Conference of the Parties 21) by working to reduce greenhouse gas emissions, as well as promoting the renewable energy sector of the economy. In 2024, Raiffeisen Bank International calculated its targets for own operations using the methodology provided by SBTi to align with the 1.5°C pathway required by the CSRD with 2024 as base year. The Group is committed to support the Raiffeisen Bank International target achievement.

Steering in areas such as business travel and renewable energy acquisition represents a particular opportunity for the Group with regards to the environmental impact of its own operations.

### **Value chain**

#### **Assessment of the materiality of climate and environment-related risk**

While the UNEP FI portfolio impact analysis considers the inside-out perspective, the materiality assessment described below focuses on the outside-in view, i.e., how the climate and environmental risks affect the Bank's risk profile. The inside-out view, would additionally address how its activities affect the outside world (including the financed emission calculation, as well as how science-based targets measure and mitigate the inside-out impact).

The additional climate and environmental risk assessment process has been established to identify the severity of environmental risk from applicable transmission channels within the current portfolio and over different time horizons. This multiple dimensional approach considers:

- Different individual climate and environmental risk drivers (physical risk, transition risk, other environmental risks)
- The impact of each climate and environmental risk driver through risk-dependent transmission channels, assessed for each risk type (credit, market, operational and liquidity risk).

### **Individual climate and environmental risk drivers**

#### **Transition risk**

With transition risk being defined as the risks related to the process of adjustment towards a low-carbon economy, the transition risk drivers represent changes politics, legislation and regulation, changes in technology, and changes in market and customer sentiment, each of which has the potential to generate, accelerate, slow or disrupt the transition towards a low-carbon economy. Looking one step further, the transmission channels are the causal chains that explain how climate risk drivers give rise to financial risks that impact banks directly or indirectly through their counterparties, the assets they hold, and the economy in which they operate.

#### **Credit risk**

Credit risk increases if climate risk drivers reduce borrowers' ability to repay and service debt (income effect) or banks' ability to fully recover the value of a loan in the event of default (wealth effect). For the corporate customer portfolio, macroeconomic and climate-related risk factors (such as carbon tax, and expenses for the emission trading system (ETS)) are used. These factors are used to create sector-specific forecasts of production and operating costs which are distributed across borrower's financial metrics such as operating income, operating costs and additional costs for green transitions, etc.

## Market risk

Climate and environmental risk drivers may have a significant impact on the value of financial assets. Transition-related changes in public sector politics, technological advances and changes in investor sentiment may change the assessment about future economic conditions or the value of real or financial assets. This can lead to negative price shocks and an increase in market volatility in traded assets. For instance, the transition to a low-carbon economy may impact commodity markets, especially fossil fuels which are prone to transition risks. Transition risk could also lead to a breakdown in correlations between assets, reducing the effectiveness of hedges and challenging banks' abilities to actively manage their risks.

The impact of transition risk on market risk is assessed using Raiffeisen Bank International developed methodology. This covers both corporate and sovereign issuers, according to which risk levels are assigned to positions – based on the NACE code/industry and risk country of the issuer. Corporate exposures are linked to NACE codes/industries and risk levels are assigned based on the industry share of GHG emissions in the risk country's total GHG emissions. Sovereigns are linked to countries and risk levels are based on several factors: the industry's GHG emissions, gross value added, wages and salaries, social security costs, environmental taxes, and operational surplus and mixed income (net).

## Liquidity risk

From a liquidity risk perspective, climate change transition risk may affect inflows from customers' loan repayments (due to lower creditworthiness) and the value of securities in the liquidity buffer although it should be mentioned that such observations has not been recorded in the past respectively in the financial year 2024. Liabilities and retail loans are not deemed vulnerable to transition risk. Meanwhile, if it is assumed that the transition risk is spread over a period of more than three months (i.e., a relatively gradual change in the legislative environment), the effect on liquidity risk is deemed negligible as it is expected that the Bank's balance sheet will gradually adapt to the change. If the risk realization period is less than three months, the effect will be more palpable and is approached using the same assumptions as for market risk in terms of the devaluation of securities in the liquidity buffer, and credit risk, in terms of decreased inflows from loans due to a higher default rate. The materiality is assessed on the basis of the liquidity buffer devaluations' relative impact on liquidity surplus estimated by internal stress test model (time to wall).

## Operational risk

Corporates and banks may be exposed to increasing legal and regulatory compliance risk, as well as litigation and liability costs associated with climate-sensitive investments and businesses. Climate-related lawsuits could hold corporates and banks accountable for past environmental behaviour while also influencing their future actions. The impact of this transmission channel is assessed by the operational risk framework that is in place, as current expected losses are measured by analysing historical data as well as identifying trends and forward-looking approaches. Additionally, higher compliance and legal costs are simulated in the greenwashing scenario. Operational risk is assessed on the loss in relation to the total revenue of the Bank's.

## Physical risk

Physical risk drivers are changes in both weather and climate. They are expected to increase over a longer time horizon if the transition to a sustainable, net-zero economy is not successful (e.g. the hot-house world which is a high emission scenario).

Physical risks can be classified as acute risks, which are related to extreme weather events, or chronic risks associated with gradual shifts in climate:

- Acute physical risks are generally considered to consist of: floods, wildfires and storms, including hurricanes, cyclones and typhoons, as well as extreme precipitation.
- Chronic physical risks include rising sea levels, rising average temperatures, and water stress. Extended periods of increased temperatures may also lead to further chronic climate events, such as desertification.

Similarly, extended periods of increased average temperatures could impact the ecosystem, especially agriculture. How physical risks impact economies will vary depending on geographical location as different regions exhibit distinct climate patterns and levels of development.

All these hazards are assessed via risk-specific transmission channels over a short, medium and long-term horizon (see chapter time horizons) under the orderly and hot-house world scenario based on a physical risk map containing information on hazard-specific vulnerability and impact for each relevant geolocation.

## Credit risk

Physical risk drivers mainly impact banks' credit risk through their counterparties. The physical capital (housing, inventory, property, equipment or infrastructure) of households, corporates and sovereigns can be damaged or destroyed by physical hazards. This damage reduces the value of assets and, consequently, a counterparty's wealth. Physical risk drivers can also negatively impact

the cash flows of the affected entities as damaged physical capital, such as impaired rental properties and factories, will generate less income. The damage may be caused by acute physical risks and chronic physical risks, such as rising sea levels. The materiality of this transmission channel is assessed by mapping portfolio exposure to a physical risk map under different transition scenarios (orderly, disorderly, hot house), while accounting for coping capacity at the country level (INFORM risk model).

### Market risk

Physical risk may be sudden and severe and have knock-on effects across regions and sectors through interconnected socioeconomic and financial systems. Physical risks emerging from climate change can cause market price fluctuations, such as more frequent and severe extreme weather events causing losses in equity prices due to the destruction of firms' assets or capacity to produce. Uncertainty about the timing, intensity and location of future severe weather events and other natural disasters may lead to higher volatility on the financial markets. Overall, the presence of physical risk may lead to a classical risk factor (e.g. an equity price or an exchange rate) being more volatile than historically observed, or being subject to severe jumps, diminishing the value of the financial instrument being traded. This transmission channel is assessed by mapping market risk exposure to a physical risk map (again under different transition scenarios (orderly, disorderly, hot house), while considering historical losses and the impact on GDP.

### Liquidity risk

Similar considerations apply as with transition risks. If the risk event is spread over a significant period of time or does not have an immediate effect, this risk has a negligible impact on liquidity risk. If acute climate physical risks materialize, the following effects are possible:

- Devaluation of securities in the liquidity buffer (in line with the market risk assessment).
- Decrease in inflows from loans due to a higher default rate and higher rollover rate, combined with higher withdrawals of loans from credit lines.

Customers, including those in the retail segment, use loans to cover damages caused by the event. Outflows from customers' liabilities arise due to the need to cover damage caused by the event. This effect is not straightforward, as if a bank has a significant market share and a diverse customer base, it is most likely that a customer who has suffered from the event would have to pay other customers (e.g. retail customers with damaged houses will pay for construction goods). In addition, the effect can be temporary in this case, as if the accounts are mainly in a customer's portfolio, inflows from insurance coverage will be reflected in the liabilities relatively soon after the potential decrease.

The materiality of this transmission channel has been evaluated by analysing the effect on the liquidity buffer under different interest and credit spread shocks under different transition scenarios, derived from the region-dependent physical risk score.

### Operational risk

Physical hazards can affect banks directly as operational risks. For instance, if physical hazards disrupt transportation facilities and telecommunications infrastructure, banks' operational ability may be reduced. The impact of this transmission channel was assessed by extending the physical risk drivers to the operational risk assessment and scenario. In this scenario, business continuity management costs are measured using scenario methodology, i.e., it is assumed that the physical risk may cause potential business continuity management events (critical site not available and IT availability & continuity). The locations for both the primary head office and data centers were evaluated by the external data provider in terms of exposure to the climate and environmental risk drivers mentioned. The results of the scenario analysis did not reveal any severe impacts from those specific risk drivers.

### Results of climate-related risk assessment

In the materiality assessment 2024, with the cut-off date of 30 June 2024 and using the methodology outlined above, moderate transition risk was identified in the long term (more than 10 years) for operational risk only. Transmission of other transitional and physical risks to the market, liquidity, operational and credit risk indicators was assessed at a low level for the Bank.

Climate and environmental materiality assessment				
		Short term	Medium term	Long term
Credit risk	Transition risk	Low	Low	Low
	Physical risk	Low	Low	Low
Market risk	Transition risk	Low	Low	Low
	Physical risk	Low	Low	Low
Operational risk incl. reputational risk	Transition risk	Low	Low	Moderate

	Physical risk	Low	Low	Low
Liquidity risk	Transition risk	Low	Low	Low
	Physical risk	Low	Low	Low

The thresholds for the materiality analysis are determined individually by risk type. For credit risk, the effect of transition risk is derived from the probability of default of customers in different transition scenarios compared to actual values. For physical risk, the threshold is set individually for each possible event (e.g. flood, wildfire), and the final effect represents a combination of the event's probability and the resilience of a region. For operational risk, the estimated loss in both transition and physical risk scenarios is compared against a threshold in accordance with the Bank's internal operational risk framework.

To mitigate the risk from income dependency, the following initiatives in particular are important to mention:

- The dialogue with clients on existing or planned transition plans is a high priority for the Bank during 2025;
- Limits for financed emissions and alignment of transition targets (distance to Net Zero Emission 2050 scenario) have been established.
- Reduction of emission intensity is key to tracking the progress in greenifying the Bank's business. The collaterals must meet a certain energy efficiency to be considered of satisfactory quality with ESG criteria.

In addition, the ESG scores for quantitative and qualitative indicators as described in the chapter ESG customer score are considered in the overall corporate risk assessment. The ESG scores are generated as part of the lending process during the usual credit rating process, unless due to adverse events an ad-hoc review is triggered. The aggregated ESG risk assessment in 2024, incorporating all the aforementioned contributors, remained low for the Bank.

The result of the assessment informs the ESG business strategy. Risk assessment is expected to be further refined during the coming years as the methodologies and common methodologies evolve.

Further information regarding physical risk and transition risk, as well as energy efficiency and financed emissions, can be found here: [E1-6: Gross GHG emissions of categories Scope 1, 2, and 3 as well as total GHG emissions.](#)

## IRO-2: Disclosure requirements in ESRS covered by the sustainability statement

Sector-agnostic standards		
Disclosure requirements	Page reference	Omissions/explanations
<b>ESRS 2 General disclosures</b>		
BP-1: General basis for preparation of sustainability	<a href="#">25</a>	
BP-2: Disclosures in relation to specific circumstances	<a href="#">26</a>	
GOV-1: The role of the administrative, management and supervisory bodies	<a href="#">30</a>	
GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	<a href="#">37</a>	
GOV-3: Integration of sustainability-related performance in incentive schemes	<a href="#">38</a>	
GOV-4: Statement on due diligence	<a href="#">39</a>	
GOV-5: Risk management and internal controls over sustainability reporting	<a href="#">40</a>	
SBM-1: Strategy, business model and value chain	<a href="#">43</a>	
SBM-2: Interests and views of stakeholders	<a href="#">46</a>	
SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">51</a>	
IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	<a href="#">58</a>	
IRO-2: Disclosure requirements in ESRS covered by the undertaking's sustainability statement	<a href="#">65</a>	
<b>E1 Climate change</b>		
GOV-3: Integration of sustainability-related performance in incentive schemes	<a href="#">38</a>	
E1-1: Transition plan for climate change mitigation	<a href="#">77</a>	
SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">79</a>	
ESRS 2 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities	<a href="#">58</a>	
E1-2: Policies related to climate change mitigation and adaptation	<a href="#">79</a>	
E1-3: Actions and resources in relation to climate change policies	<a href="#">84</a>	
E1-4: Targets related to climate change mitigation and adaptation	<a href="#">88</a>	
E1-5: Energy consumption and mix	<a href="#">90</a>	
E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions	<a href="#">91</a>	
E1-7: GHG removals and GHG mitigation projects financed through carbon credits		Not material, hence not disclosed.
E1-8: Internal carbon pricing		Not material, hence not disclosed.
E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		Phase-in
<b>E5 Resource and circular economy</b>		
ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	<a href="#">58</a>	
E5-1: Policies related to resource use and circular economy	<a href="#">98</a>	
E5-2: Actions and resources related to resource use and circular economy	<a href="#">98</a>	
E5-3: Targets related to resource use and circular economy	<a href="#">99</a>	
E5-4: Resource inflows	<a href="#">99</a>	
E5-5: Resource outflows	<a href="#">100</a>	
E5-6: Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities		Phase-in
<b>S1 Own workforce</b>		
ESRS 2 SBM-2: Interests and views of stakeholders	<a href="#">46</a>	
ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">101</a>	
S1-1: Policies related to own workforce	<a href="#">104</a>	
S1-2: Processes for engaging with own workers and workers' representatives about impacts	<a href="#">110</a>	
S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns	<a href="#">111</a>	
S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	<a href="#">112</a>	
S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	<a href="#">118</a>	
S1-6: Characteristics of the undertaking's employees	<a href="#">119</a>	
S1-7: Characteristics of non-employee workers in the undertaking's own workforce		Phase-in
S1-8: Collective bargaining coverage and social dialogu	<a href="#">119</a>	
S1-9: Diversity metric	<a href="#">120</a>	
S1-10: Adequate wages	<a href="#">120</a>	
S1-11: Social protection	<a href="#">120</a>	

Sector-agnostic standards		
Disclosure requirements	Page reference	Omissions/explanations
S1-12: Persons with disabilities	<a href="#">121</a>	
S1-13: Training and skills development metrics	<a href="#">121</a>	
S1-14: Health and safety metrics	<a href="#">121</a>	Health and safety metrics - phase in S1-14 DR 88e
S1-15: Work-life balance metrics	<a href="#">122</a>	
S1-16: Compensation metrics (pay gap and total compensation)	<a href="#">122</a>	
S1-17: Incidents, complaints and severe human rights impacts	<a href="#">123</a>	
<b>S4 Consumers and end-users</b>		
ESRS 2 SBM-2: Interests and views of stakeholders	<a href="#">46</a>	
ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">124</a>	
S4-1: Policies related to consumers and end-users	<a href="#">128</a>	
S4-2: Processes for engaging with consumers and end-users about impacts	<a href="#">138</a>	
S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	<a href="#">140</a>	
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	<a href="#">141</a>	
S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	<a href="#">145</a>	
<b>G1 Business conduct</b>		
ESRS 2 GOV-1: The role of the administrative, supervisory and management bodies	<a href="#">30</a>	
ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities	<a href="#">58</a>	
G1-1: Corporate culture and Business conduct policies and corporate culture	<a href="#">146</a>	
G1-2: Management of relationships with suppliers	<a href="#">149</a>	
G1-3: Prevention and detection of corruption and bribery	<a href="#">150</a>	
G1-4: Confirmed incidents of corruption or bribery	<a href="#">153</a>	
G1-5: Political influence and lobbying activities		<b>Not material, hence not disclosed</b>
G1-6: Payment practices	<a href="#">153</a>	

An overall threshold of 0.66 was set for the impact materiality and financial materiality (risks and opportunities), derived from assessments of various criteria. If the impact materiality and/or financial materiality of an ESRS topic exceeded this threshold, it was considered material for the Group and was included in the sustainability statement for 2024.

## List of data points in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related data point	SFDR	Pillar 3	Benchmark Regulation	EU Climate Law	Reference
ESRS 2 GOV-1 Board's gender diversity § 21(d)	Indicator number 13 Table #1 of Annex		Commission Delegated Regulation (EU) 2020/18 16, Annex II		GOV-1: The role of the administrative, management and supervisory bodies S1-9- Diversity Metric
ESRS 2 GOV-1 Percentage of board members who are independent § 21(e)			Commission Delegated Regulation (EU) 2020/18 16, Annex II		GOV-1: The role of the administrative, management and supervisory bodies
ESRS 2 GOV-4 Statement on due diligence § 30	Indicator number 10 Table #3 of Annex 1				GOV-4: Statement on due diligence
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities § 40(d) i	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/245328 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Commission Delegated Regulation (EU) 2020/18 16, Annex II		BP-1: General basis for preparation of the consolidated non-financial statement Governance SBM-1: Strategy, business model and value chain
ESRS 2 SBM-1 Involvement in activities related to chemical production § 40(d) ii	Indicator number 9 Table #2 of Annex 1		Commission Delegated Regulation (EU) 2020/18 16, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons § 40(d) iii	Indicator number 14 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/18 18 Article 12(1), Delegated Regulation (EU) 2020/1816, Annex I		Not applicable



Disclosure Requirement and related data point	SFDR	Pillar 3	Benchmark Regulation	EU Climate Law	Reference
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco § 4(d) iv			Commission Delegated Regulation (EU) 2020/18 18 Article 12(1), Delegated Regulation (EU) 2020/1816, Annex I		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 § 14				Regulation (EU) 2021/1119, Article 2(1)	E1-1: Transition plan for climate change mitigation
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks § 16(g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Commission Delegated Regulation (EU) 2020/18 18 Article 12.1 (d) to (g), and Article 12.2		<a href="#">Pillar 3 report</a>
ESRS E1-4 GHG emission reduction targets § 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Commission Delegated Regulation (EU) 2020/18 18 Article 6		<a href="#">Pillar 3 report</a>
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) § 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1				Not applicable
ESRS E1-5 Energy consumption and mix § 37	Indicator number 5 Table #1 of Annex 1				E1-5: Energy consumption and mix
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors § 40 to 43	Indicator number 6 Table #1 of Annex 1				Not applicable
ESRS E1-6 Gross scope 1, 2, 3 and total GHG emissions § 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity			E1-6: Gross scopes 1, 2, 3 and total GHG emissions
ESRS E1-6 Gross GHG emissions intensity § 53 to 55	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Commission Delegated Regulation (EU) 2020/1818, Article 8(1)		E1-6: Gross scopes 1, 2, 3 and total GHG emissions
ESRS E1-7 GHG removals and carbon credits § 56				Regulation (EU) 2021/1119, Article 2(1)	Not applicable
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks § 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phase-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk § 66(a) ESRS E1-9 Location of significant assets at material physical risk § 66(c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Phase-in

Disclosure Requirement and related data point	SFDR	Pillar 3	Benchmark Regulation	EU Climate Law	Reference
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes § 67(c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2; Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities § 69			Delegated Regulation (EU) 2020/1818, Annex II		Phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, § 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources § 9	Indicator number 7 Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy § 13	Indicator number 8 Table 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas § 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused § 28(c)	Indicator number 6.2 Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m <sup>3</sup> per net revenue on own operations § 29	Indicator number 6.1 Table #2 of Annex 1				Not material
ESRS 2- IRO 1 - E4 § 16(a)	Indicator number 7 Table #1 of Annex 1				Not material
ESRS 2- IRO 1 - E4 § 16(b)	Indicator number 10 Table #2 of Annex 1				Not material
ESRS 2- IRO 1 - E4 § 16(c)	Indicator number 14 Table #2 of Annex 1				Not material
ESRS E4-2 Sustainable land / agriculture practices or policies § 24(b)	Indicator number 11 Table #2 of Annex 1				Not material
ESRS E4-2 Sustainable oceans / seas practices or policies § 24(c)	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E4-2 Policies to address deforestation § 24(d)	Indicator number 15 Table #2 of Annex 1				Not material
ESRS E5-5 Non-recycled waste § 37 (d)	Indicator number 13 Table #2 of Annex 1				Not material
ESRS E5-5 Hazardous waste and radioactive waste § 3	Indicator number 9 Table #1 of Annex 1				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labour § 14(f)	Indicator number 13 Table #3 of Annex I				Not material
ESRS 2- SBM3 - S1 Risk of incidents of child labour § 14(g)	Indicator number 12 Table #3 of Annex I				Not material
ESRS S1-1 Human rights policy commitments § 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Not applicable
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, § 2			Delegated Regulation (EU) 2020/1816, Annex II		Not applicable



Disclosure Requirement and related data point	SFDR	Pillar 3	Benchmark Regulation	EU Climate Law	Reference
ESRS S1-1 Processes and measures for preventing trafficking in human beings § 22	Indicator number 11 Table #3 of Annex I				Company agreements
ESRS S1-1 Workplace accident prevention policy or management system § 23	Indicator number 1 Table #3 of Annex I				Company agreements
ESRS S1-3 Grievance/complaints handling mechanisms § 32 (c)	Indicator number 5 Table #3 of Annex I				S1-3: Processes to remediate negative impacts and channels for own workforce to raise concerns
ESRS S1-14 Number of fatalities and number and rate of work-related accidents § 88(b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		S1-14: Health and safety metrics
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness § 88(e)	Indicator number 3 Table #3 of Annex I				S1-14: Health and safety metrics
ESRS S1-16 Unadjusted gender pay gap § 97(a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		S1-16: Remuneration metrics (pay gap and total remuneration)
ESRS S1-16 Excessive CEO pay ratio § 97(b)	Indicator number 8 Table #3 of Annex I				S1-16: Remuneration metrics (pay gap and total remuneration)
ESRS S1-17 Incidents of discrimination § 103(a)	Indicator number 7 Table #3 of Annex I				S1-17: Incidents, complaints and severe human rights impacts
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines § 104(a)	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		S1-17: Incidents, complaints and severe human rights impacts
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain § 11(b)	Indicators number 12 and number 13 Table #3 of Annex I				Not material sub-topic
ESRS S2-1 Human rights policy commitments § 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Not material sub-topic
ESRS S2-1 Policies related to value chain workers § 18	Indicators number 11 and number 4 Table #3 of Annex 1				Not material sub-topic
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines § 1	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material sub-topic
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, § 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material sub-topic
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain § 36	Indicator number 14 Table #3 of Annex 1				Not material sub-topic
ESRS S3-1 Human rights policy commitments § 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material sub-topic
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles and OECD guideline § 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material sub-topic
ESRS S3-4 Human rights issues and incidents § 36	Indicator number 14 Table #3 of Annex 1				Not material sub-topic



<b>Disclosure Requirement and related data point</b>	<b>SFDR</b>	<b>Pillar 3</b>	<b>Benchmark Regulation</b>	<b>EU Climate Law</b>	<b>Reference</b>
ESRS S4-1 Policies related to consumers and end-users § 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				S4-1 Policies related to information-related impacts for consumers and end-users
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines § 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		S4-1: Policies relating to consumers and end-users
ESRS S4-4 Human rights issues and incidents § 35	Indicator number 14 Table #3 of Annex 1				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 the effectiveness of these actions and approaches
ESRS G1-1 United Nations Convention against Corruption § 10(b)	Indicator number 15 Table #3 of Annex 1				Not applicable
ESRS G1-1 Protection of whistle blowers § 10(d)	Indicator number 6 Table #3 of Annex 1				Not applicable
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws § 24(a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		G1-4: Incidents of corruption or bribery
ESRS G1-4 Standards of anti-corruption and anti-bribery § 24(b)	Indicator number 16 Table #3 of Annex 1				G1-4: Incidents of corruption or bribery

## Environmental Information

### Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation

The EU Taxonomy Regulation sets out an EU-wide framework that allows investors and undertakings to determine whether certain economic activities are environmentally sustainable. Article 8 of the EU Taxonomy Regulation requires undertakings covered by the Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (CSRD) to publish information on how and to what extent their economic activities qualify as environmentally sustainable under the EU Taxonomy Regulation.

The Group is therefore required to disclose the taxonomy eligibility and taxonomy alignment of its economic activities for 2024.

The Green Asset Ratio (GAR) serves as a benchmark and reporting metric for taxonomy alignment. It describes the share of Group's green taxonomy-aligned business relative to the covered assets. However, the GARs disclosed by the Bank for 2023 were mostly based on retail exposure, as well as general-purpose exposure to non-financial undertakings which were subject to the Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups the Non-Financial Reporting Directive (NFRD; now CSRD). Loans to smaller companies and non-EU businesses, for instance, were not included in 2023 and remained excluded for the 2024 disclosure.

#### I. Mandatory disclosure

The Group disclosed all key performance indicators (KPIs) in accordance with the Disclosures Delegated Act (Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021). This regulation supplements Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation. For additional information and improved clarity, the disclosure of these quantitative KPIs was supplemented by qualitative information pursuant to Annex XI of the Disclosures Delegated Act. For 2023, the Bank disclosed information on taxonomy eligibility and alignment with regard to the first two environmental objectives – climate change mitigation and climate change adaptation.

An overview of the relevant key figures and templates that are reported in accordance with Article 8 of the EU Taxonomy Regulation and the supplementary Disclosure Delegated Act for 2024 is available starting at the [end](#) of the document. The figures for the main KPI GAR stock and the additional KPI GAR flow are shown below.

#### Green Asset Ratio - Stock and flow

		Turnover GAR KPI		CapEx GAR KPI	
		31 December 2024	31 December 2023	31 December 2024	31 December 2023
		GROUP	BANK	GROUP	BANK
Main KPI	GAR stock	0.48 %	2.11 %	2.95 %	4.21 %
Additional KPI	GAR flow	0.59 %	0.28 %	4.18 %	1.04 %

For 2024, a more conservative physical risk methodology has been applied to the taxonomy aligned mortgage portfolio of the Bank.

#### II. Details of templates and covered exposures as well as information on data sources and current data limitations

All EU Taxonomy Regulation KPIs for 2024 were determined in accordance with the legal requirements as set out in the Disclosures Delegated Act, both on turnover-based as well as capital expenditure-based (CapEx) information disclosed by Group's clients. For 2024, taxonomy eligibility and alignment is reported for all environmental objectives required by EU Taxonomy Regulation.

Detailed information on the calculations as per the qualitative disclosures required by Annex XI and Annex XII of the Delegated Disclosure Regulation can be found separately for each KPI below.

## **The approach for determining taxonomy-eligible and taxonomy-aligned economic activities, assets and economic sectors (template 0-2)**

Total covered assets were identified as per the requirements of the full GAR disclosure. Exposures towards central banks, supranational institutions, the central government and assets held for trading were excluded. The remaining covered assets formed the denominator in the formula for calculating the GAR.

All taxonomy-eligible and taxonomy-aligned economic activities were included in the numerator for calculating the GAR. They were defined as covered assets additionally belonging to one of the following categories:

- Taxonomy-eligible and taxonomy-aligned economic activities of CSRD undertakings  
The disclosure was based in accordance with Article 8 of the EU Taxonomy Regulation on the obligation to publish non-financial information pursuant to Articles 19a and 29a of Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC. While for 2023, these articles were set out in NFRD, for 2024, the disclosure was based on the CSRD which replaced the respective Articles 19a and 29a.
- Taxonomy-eligible and taxonomy-aligned economic activities in retail banking
- Taxonomy-eligible and taxonomy-aligned economic activities related to local and regional government financing
- Real estate collaterals obtained by taking possession in exchange for the cancellation of debt and held for sale.

In addition, derivatives (not held for trading), on-demand interbank loans, cash and cash-related assets and other assets (e.g. goodwill, commodities) were also excluded from the numerator, but were included in the calculation of the denominator for the GAR. Further, no exposures to non-EU or to small and medium-sized enterprises were taken into consideration.

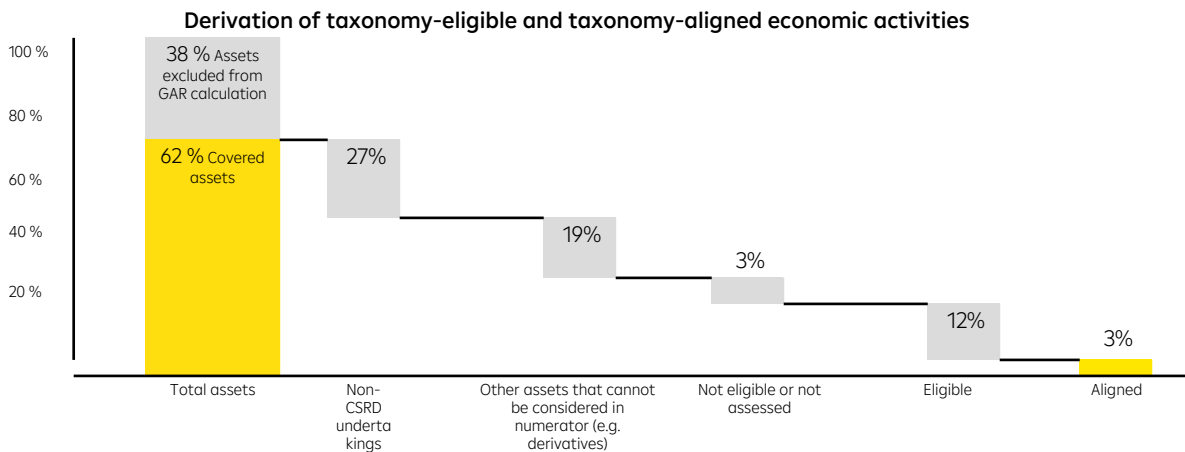
If the purpose was known at transaction level and was consistent with the defined activities of the EU Taxonomy Regulation or the supplementary delegated regulations – for example, a property loan (acquisition and ownership of a building) – were considered exposures to the extent that taxonomy eligibility and taxonomy alignment could be demonstrated for the underlying transaction. In cases where a transaction qualified for more than one environmental objective, the transaction was assigned, or an appropriate portion of it, to the most relevant objective to prevent double counting. The decision on which environmental goal is considered the most relevant is made based on expert opinion during the assessment and should reflect the purpose of the transaction.

For transactions conducted for general purposes – for example, for granting a working capital facility – were considered the relevant taxonomy KPIs for taxonomy eligibility and taxonomy alignment provided or disclosed by the counterparties.

The relevant taxonomy KPIs for general-purpose transactions, including investment (CapEx) and turnover KPIs for non-financial counterparties, as well as taxonomy-specific KPIs for financial counterparties, were gathered with the support of RBL through an internal data collection project and supplemented by an external data provider.

For 2024, for the first time, KPIs for taxonomy alignment for the first two environmental objectives of financial counterparties were included. Regarding taxonomy eligibility, both financial and non-financial counterparties published KPIs for the four new environmental objectives for the first time for the 2023 financial year. Non-financial undertakings are required to publish KPIs for taxonomy alignment for these four new environmental objectives for the 2024 financial year, while financial undertakings will be required to do so for the 2025 financial year.

As structured data availability remains limited and given the limitations described above, The Group's relevant portfolio could not be considered in full for the GAR assessment. However, The Group is consistently working to improve the data situation. Further, it is expected that the share of taxonomy-eligible and taxonomy-aligned exposures will change accordingly and increase in the future as more information is disclosed by customers. The allocation of NACE codes, as disclosed in template 2 for the GAR sector information, is based on the main business of the counterparty, which is identified via information from local public registries or based on data from an external data provider.



### Exposures to taxonomy-aligned economic activities/covered assets (GAR (stock)) (template 3)

The Group's assets with exposures to taxonomy-aligned economic activities amounted to RON 1,533,340 thousands (GAR numerator CapEx) and to RON 251,717 (GAR numerator Turnover). In accordance with the instructions set out in Annex V of the Disclosures Delegated Act, the exposures to be included in the numerator encompass banking book loans and advances to CSRD-relevant clients, households (limited to loans collateralized by residential real estate), and loans and advances to local governments.

All retail exposures relevant to the EU Taxonomy were analysed under the relevant economic activities and environmental objectives in accordance with the Disclosures Delegated Act and included in the CapEx as well as in the turnover GAR. With regard to compliance with minimum social safeguards (MS), the interpretation of the Platform on Sustainable Finance as set out in the Final Report on Minimum Safeguards (available at [sustainable-finance-platform-finance-report](#)) was followed, which does not provide the application of the MS criteria for retail exposures. The total taxonomy-aligned exposure considered under this approach amounted to and corresponded to a contribution to the GAR points.

The retail exposures were analysed in detail, particularly house purchase loans. Besides identifying thresholds for Nearly Zero Energy Buildings (NZEB), analyses in terms of Primary Energy Demand (PED) for economic activity 7.7 (acquisition and ownership of buildings) were included in the calculation, where such analyses were based on transparent real data in line with the relevant frequently asked questions (FAQs) of the Commission. Estimates, for example based on the year of construction, were only included in the voluntary disclosure.

The physical risk assessment for the retail segment was carried out with the support of Raiffeisen Bank International via the help of an external provider. A physical risk assessment, including a vulnerability analysis, was conducted for the relevant financed properties in accordance with Appendix A of Annex I of Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives. The physical risk assessment considered acute and chronic risks for the relevant hazards set out in that Appendix and used an Intergovernmental Panel on Climate Change (IPCC) RCP 8.5 scenario. The assessment was not passed if the seriousness of a threat was considered very high and no corresponding risk mitigation measures were taken.

By referencing to internally available data, Group's CSRD client base was determined according to the following criteria:

- The country in which the counterparty is registered must be an EU member state.
- The business partner's total assets (on a consolidated basis) must be equal to or greater than € 25 million or its total revenue (turnover) must be equal to or greater than € 50 million. For insurance and reinsurance undertakings, the gross premiums written were used instead of revenue and the gross operating result for the other financial institutions.
- The relevant thresholds as set out in Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (the Accounting Directive) were updated by Commission Delegated Directive (EU) 2023/2775 of 17 October 2023 amending Directive 2013/34/EU of the European Parliament and of the Council as regards the adjustments of the size criteria for micro, small, medium-sized and large undertakings or groups.
- The customer was either a capital market-oriented company, a credit institution or an insurance undertaking.

- The customer had more than 500 employees on average (on a consolidated basis).

The Group also considered subsidiaries that were fully consolidated under CSRD customers and did not publish/provide taxonomy KPIs on a standalone basis in a sustainability report.

The disclosure of taxonomy-eligible and taxonomy-aligned exposures must be based on actual information provided by the financial or nonfinancial undertaking. Such data were collected as part of the Raiffeisen Bank International data collection project. In addition, third-party data providers were used to obtain information for the assessment of taxonomy-eligible and taxonomy-aligned economic activities.

#### **Exposures to taxonomy-aligned economic activities/covered assets (GAR (flow)) (template 4)**

The GAR KPI flow was calculated in line with GAR KPI stock. However, unlike GAR KPI stock, it only took into account those positions that were newly concluded in the 2024 financial year.

#### **Off-balance-sheet exposures to taxonomy-aligned economic activities/covered assets (template 5)**

The off-balance sheet exposures were analysed, both with known purposes and general purposes with regard to taxonomy alignment for the first two environmental objectives – climate change mitigation and climate change adaptation – and the taxonomy eligibility of the four new environmental objectives. For the disclosure of off-balance-sheet exposures, a distinction was made between financial guarantees and assets under management.

The methodology for calculating the KPI for financial guarantees corresponded to the methodology established for loans and advances, and for bonds. However, it was applied to the underlying transaction of the financial guarantees. If no data on the specific purpose of the underlying transaction was available, the counterparties' KPIs were used. For the earmarked exposures, the counterparties' taxonomy data was collected by Raiffeisen Bank International as part of the data collection project and supplemented by an external data provider.

The KPI for assets under management was calculated in line with the methodology determined for asset managers. The numerator comprised the weighted average value of the investments in the taxonomy-aligned economic activities of the enterprises in which investments were made. Reference was made to the information on the taxonomy eligibility and taxonomy alignment of the respective counterparties (financial and nonfinancial CSRD undertakings) and the corresponding KPIs were used. For the earmarked exposures, data was also collected by Raiffeisen Bank International as part of the data collection project and supplemented by an external data provider. The Group is committed to continuously improving its own processes and addressing the topic of ESG data availability and quality as part of a constructive dialogue with the relevant stakeholders.

#### **Exposures to taxonomy-eligible and taxonomy-aligned economic activities/covered assets for nuclear and gas economic activities (templates in accordance with Annex XII of the Disclosures Delegated Act)**

The EU Taxonomy includes six economic activities in the nuclear and gas sector. Companies operating in these sectors which are subject to taxonomy disclosures are therefore required to publish EU Taxonomy data on taxonomy eligibility and taxonomy alignment for their relevant nuclear and gas activities.

### **III. Adjustments in the presentation of information compared to the previous annual reporting period**

The EU Taxonomy is a novel framework, and the interpretation of its requirements is still subject to changes. Further guidance, such as those provided by the European Commission in the FAQs can provide clarity and was continuously monitored and evaluated. The disclosure in accordance with Article 8 of the EU Taxonomy for 2024 reflected Group's current understanding of the EU Taxonomy. Where this interpretation had changed compared to the previous annual reporting period and resulted in adjustments in the presentation of information in the disclosure, these changes will be described in detail with the respective templates below.

### Overview of relevant KPIs and templates:

Template number	Designation	Brief explanation
0	Summary of KPIs	Summary of all relevant GAR KPIs
1	Assets for the calculation of GAR	Summary of all relevant assets used for calculation of GAR
2	GAR sector information	Summary of exposures in the non-trading book relative to the sectors covered by the Taxonomy (NACE sectors, four breakdown levels)
3	GAR KPI stock	Exposures to Taxonomy-eligible economic activities/covered assets for all six <sup>*</sup> environmental objectives and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives climate change mitigation and climate change adaptation (turnover and CapEx GAP (stock))
4	GAR KPI flow	Exposures to Taxonomy-eligible economic activities/covered assets for all six <sup>*</sup> environmental objectives and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives climate change mitigation and climate change adaptation (turnover and CapEx GAP (flow))
5	KPI off-balance-sheet exposures	Exposures to Taxonomy-eligible economic activities/covered assets for all six <sup>*</sup> environmental objectives and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives climate change mitigation and climate change adaptation (off-balance): per cent (turnover) and per cent (CapEx) (GAR financial guarantees) Exposures to Taxonomy-eligible economic activities/covered assets for all six <sup>*</sup> environmental objectives and Taxonomy-aligned economic activities/covered assets for the first two environmental objectives climate change mitigation and climate change adaptation (off-balance): per cent (turnover) and per cent (CapEx) (GAR assets under management)
6	KPI on fee and commission income from services other than lending and asset management	Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for all six <sup>*</sup> environmental objectives (turnover and CapEx GAR (fee and commission income)) This indicator does not have to be reported until 2026 for the 2025 financial year.
7	KPI trading book portfolio	Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/covered assets for all six <sup>*</sup> environmental objectives (turnover and CapEx GAR (trading book portfolio)). This indicator does not have to be reported until 2026 for the 2025 financial year.

\*Climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

**Template 0 – Summary of KPIs**

31 December 2024		Total environmentally sustainable activities	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)
GROUP							
Main KPI	Green asset ratio (GAR) stock	251,717	0.48 %	2.95 %	61.83 %	46.38 %	38.17 %

31 December 2024		Total environmentally sustainable activities	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)
GROUP							
Additional KPIs	GAR (flow)	100,999	0.59 %	4.18 %	73.75 %	61.59 %	26.25 %
	Trading book*	–	– %	– %			
	Financial guarantees	66,908	1.44 %	3.66 %			
	Assets under management	–	– %	– %			
	Fees and commissions income**	–	– %	– %			

31 December 2023		Total environmentally sustainable activities	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)
BANK							
Main KPI	Green asset ratio (GAR) stock	758,801	2.11 %	4.21 %	51.19 %		

31 December 2023		Total environmentally sustainable activities	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)
BANK							
Additional KPIs	GAR (flow)	100,981	0.28 %	1.04 %	62.60 %		
	Trading book*	–	– %	– %			
	Financial guarantees	61,504	1.26 %	4.93 %			
	Assets under management	–	– %	– %			
	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 these 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 Turnover KPI is used for general lending

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 as of 2026. SMEs inclusion in these KPIs will only apply subject to a positive result of an impact assessment.

## Climate change

### E1-1: Transition plan for climate change mitigation

#### Value chain

As a responsible banker, the Bank has supported Raiffeisen Bank International's early efforts to combat climate change and taken active steps to reduce the environmental impact of the portfolio as well as own operations, while for formalizing its commitment, Raiffeisen Bank International set emission reduction targets in line with the well below 2°C pathway, which were validated by the Science Based Targets initiative (SBTi) in 2022.

Nevertheless, to follow rising ambitions of both market and the regulators, which highlight a need to increase efforts of emission reduction, Raiffeisen Bank International has recalculated its emission reduction targets in 2024 according to the 1.5°C pathway outlined in the current EU legislation and supervisory expectations. The resulting targets, from which the Bank's targets were derived, are described in more detail in the following sections, conform with and follow the calculation approach and disclosure requirements of the CSRD and the EBA ITS.

The Bank has set itself the goal of supporting its customers from the retail, corporate and institutional sectors in the climate and ecological turnaround. The Bank's customers are encouraged to work on a targeted basis towards improving their climate and environmental performance by developing and following a transition pathway. The Bank's Private Individuals customers are encouraged to buy green real estate (with EPC level A or superior), for which the Bank is offering a discount in interest rate and a strong communication campaign for supporting their awareness is available. The Bank also offers its customers ESG expertise and other sustainable financial products and services.

The Sustainability strategy with a focus on climate and environment developed by the Bank in 2023 and approved by the Management Board forms the foundation of the approach and underlies the Bank's execution plan for achieving 2030 climate related target. The strategy is based on three pillars, and it has a goal of supporting customers in financing their sustainable transformation and reducing emissions.

Detailed information about the Sustainability strategy can be found in the chapter on [Strategy](#).

The climate and environment are an integral part of all three pillars of the sustainability strategy. Each pillar defines a specific scope, which is then approached by specific areas.

The Bank is committed to achieve the following targets:

- Short-term (by 2025)
  - Develop and implement key elements of local execution plan to support mid-term target achievement:
    - with a special focus on high-carbon-intensity industries
    - with a focus on the client engagement
    - to support low-carbon industries
- Mid-term (by 2030)
  - Reduction of GHG emissions intensity in the corporate lending portfolio by 21,6% by 2030. For more information, please refer to the chapter [E1-4: Targets related to climate change mitigation and adaptation](#)
  - Ongoing adaption of Execution Plan –Financed Emissions Portfolio
- Long-term (by 2050)
  - the Bank aligns with Raiffeisen Bank International approach regarding the 1.5°C pathway and the net-zero greenhouse gas emission target by 2050.

The first pillar of the strategy focuses on clients and aims at aligning the Bank's portfolio with the goals of the Paris Agreement. In order to do so, climate and environmental factors are taken into account when making lending decisions, assessing risks, managing operations and allocating resources.

Management Board approved in 2024 the Bank's financed emissions targets (that were set in line with Raiffeisen Bank International's target setting). They have been formulated based on Raiffeisen Bank International approach, to be consistent with its 1.5°C pathway to achieve net zero emissions in 2050. The Raiffeisen Bank International's pathway was derived based on the Network for Greening the Financial System (NGFS) scenario. The chosen scenario is country specific as processed and published by the IMF through their Climate Change Dashboard (NGFS Phase 4 net zero orderly transition).

With the ESG risk framework and ESG risk policy statement, the Bank ensures on one hand that the ESG risk management governance is reflecting at local level the Raiffeisen Bank International policy as well and on the other hand that the bank is ensuring with specific actions and measures the meeting of the 2030 financed emissions target, as a medium-term milestone towards Raiffeisen Bank International's ambition to reach net zero emissions by 2050. In addition, the Bank strives to increase the utilization of assets for sustainable funding products such as green bonds.

The first pillar also focuses on supporting customers in their climate and environmental transition. To this end the Bank operates at industry level, customer level, and transaction and product level. At industry level, the Code of Conduct is considered. At customer level, ESG expertise, ESG literacy, and financial literacy are considered. At transaction and product level, tailor-made products, ESG assessment including taxonomy check, carbon footprint calculator integrated in Smart Market Application for private individual clients and daily banking solutions, as well as financial products in collaboration with Supranational Institutions (EIB/EIF) have been developed.

The Bank plans to implement the key elements in the Execution Plan - Financed Emissions Portfolio for corporate clients, part of the ESG Risk Policy Statement. This implies offering expertise to its customers according to their level of ESG knowledge and development, including supporting customers with little or no ESG know-how to those with high expertise and advanced ESG strategies and reporting. A special focus will be on clients with higher ESG risk and no or insufficient emission targets.

Additionally, the Bank will strive to enhance programs to support climate transition and reduce clients' financed emissions, including financial incentives and limits.

The Bank is driving forward the transition to sustainable financing, based on current ESG expertise and ESG governance. In order to make a contribution to the climate and ecological turnaround, it is important to develop, maintain and pass on expert knowledge. The establishment of ESG policies and appropriate governance (e.g. the ESG risk framework or the process to prevent greenwashing) are a key element of the strategy.

Regarding transition, a key aspect is the planned development of the sectoral policies forming a climate and environmental transition plan that are to be approved by end of year 2026. The sectoral policies are set to serve as a guide for business decisions involving large corporates with the aim to develop a corporate portfolio aligned with Raiffeisen Bank International's 1,5 °C pathway.

## **Own operations**

The Group views environmental and climate protection as part of its responsibility to society and sees itself as a fair partner to the environment. The direct environmental impacts of its operational activities are limited compared to those of production industries. Nevertheless, the Group has the goal of limiting negative environmental impacts at all of its sites.

The Group's plan for reducing own operations emissions aims to support Raiffeisen Bank International's overall Scope 1 and Scope 2 targets. The target setting and calculation methodology used by Raiffeisen Bank International is based on the Science-Based Targets Initiative (SBTi) framework and is aligned with the 1.5°C requirement by the CSRD. The Bank had its first set of emissions reduction targets published in its 2022 Sustainability Report, calculated following Raiffeisen Bank International approach and their well below 2°C pathway. To accommodate the rising ambition and an expanded scope of consolidation, the new targets for own operations were recalculated in 2024 at Raiffeisen Bank International level, using a methodology provided by the Science Based Targets Initiative, and the Group will follow the transition pathway defined by Raiffeisen Bank International, contributing to Raiffeisen Bank International target achievement. This approach is acknowledged by the Management Board.

The emissions generated through own operations are calculated via the "ESG Cockpit" software and are divided into three scopes according to the guidelines of the Greenhouse Gas Protocol:

- Scope 1 comprises all greenhouse gas emissions produced directly in the company, e.g. from the combustion of stationary sources (such as boilers) or the combustion of mobile sources (such as from the company's own fleet) and transient emissions.
- Scope 2 comprises indirect emissions that arise from the company being supplied with energy – for example, when an energy supplier provides a company with power or heat.
- Scope 3 comprises all other emissions generated within the limits of the system, e.g. by business travel, office supplies, IT and waste. However, the use of energy also causes scope 3 emissions due to transmission losses, for example.

For the target setting, SBTi absolute emissions reduction approach was chosen by RBI. It establishes a target to reduce absolute emissions by a specific percentage over a set timeline, aligning with the global carbon budget needed for a 1.5°C pathway.

Reduction targets for own operations were set by Raiffeisen Bank International for Scope 1 and 2 emissions to focus on the highest emission drivers. In line with this SBTi approach, the Group commits to contribute to Raiffeisen Bank International's set mid-term and long-term targets:

- Short-term (by 2025)
  - Implement impactful measures in own operations for reducing in-house ecology - linked CO<sub>2</sub> emissions.
- Mid-term (by 2030)
  - Contributing to Raiffeisen Bank International reduction of absolute Scope 1 and 2 GHG emissions for own operations by 42 per cent from a 2024 base year.
  - Ongoing contribution to Raiffeisen Bank International transition plan and linked measures
- Long-term (by 2050)
  - Support Raiffeisen Bank International's commitment to act in line with the 1.5°C pathway and aiming to be in line with the net-zero greenhouse gas emission target by 2050.

The transition pathway for own operations is overviewed by ESG & Sustainability Directorate in alignment with the consolidated units and implemented by the IT and Operations areas (mostly logistics and facility management, procurement and IT) and the consolidated units. There are a number of measures the Group is taking to achieve this goal, mainly focusing on sustainable energy consumption, energy efficiency, a reduction of business travel, a reduction of waste as well as materials usage.

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

### **Climate stress testing**

Applying stress testing methodologies is part of the risk identification and assessment process, and for analysing the resilience of the Bank's exposures. The climate risk stress testing exercise is an important first step in highlighting climate-related risks. The result will confirm the sectors and regions that will be identified internally as mostly affected by climate risk.

The exercise will give the Bank an important benchmark information with respect to risk model calibrations, data availability and the general confirmation of its internal framework.

In a first phase, the Bank is particularly focused on climate-related and environmental risks and it further distinguishes between risks associated with climate change (including transitional risk arising from new regulation, change in technology etc. and physical risk), circularity (including resource efficiency) and biodiversity.

The quantitative assessment of climate-related and environmental risks was given through the impact analysis and financed emissions calculation. In addition, the climate stress testing will be developed.

The internal framework will be further developed regarding both the transitional and physical risk scenarios.

The time horizon considered to be covered by the stress test exercise will refer to the short term and the long term.

For the transitional and physical risk scenarios, the risks that would be considered are, for example, the flood risk or the sharp and prolonged increases in carbon taxes and electricity costs, putted in an orderly and a disorderly scenario.

## **E1-2: Policies related to climate change mitigation and adaptation**

### **Value chain**

#### **General framework**

In the Code of Conduct the Group recognizes that the business may have an important effect on each pillar of sustainability: in the economic sphere, in society and on the environment. This is reflected in the Bank's sustainability strategy as a responsible banker, a fair partner and an engaged corporate citizen (see chapter on Bank's [Strategy](#)). The Bank's therefore strives to achieve long-term profitable business while avoiding, amongst others, social and environmental harm applying related proper due-diligence practices (see chapter [GOV-4: Statement on due diligence](#)). Furthermore, the Bank wishes to contribute to the improvement of environmental protection and social standards. The Bank is aware of sensitive business fields (especially, but not limited to nuclear power, defense and gambling) which it handles with care and for which internal norms have to be followed by staff members and management.

## Lending business (on-balance)

### Sectoral policies

ESG sectoral strategies are defined by policies at Raiffeisen Bank International group level. The sectoral policies are intended to be part of Raiffeisen Bank International's Transition Policy and will be accommodated through local policies by 2026.

At Raiffeisen Leasing IFN SA level sectoral policies are also under discussion as a concept and will be aligned accordingly at the subsidiary level, after a methodology will be established and implemented locally at the Group level.

The development of the Bank sectoral policy - will be performed by 2026 with the intention to set engagement criteria based on three layers: supportive, transformative, and restrictive and particular to the sectors, it defines how to engage with clients in the value chain and is applicable for the lending business.

The policy will be prepared based on the applicable regulatory and legal framework including:

- EU Taxonomy Regulation
- The Paris Agreement
- Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law')
- European Central Bank, Banking Supervision - Guide on climate-related and environmental risks Supervisory expectations relating to risk management and disclosure (November 2020)

To ensure awareness and implementation, several key stakeholders such as business lines, Risk Control and Portfolio Management, ESG & Sustainability, and other stakeholders will be involved from the beginning until the finalization.

### Norm regarding the clients that activate in the field of Nuclear Energy

The Raiffeisen Bank International Policy on Nuclear Energy is transposed at the Bank's level as internal norm and implemented to avoid and minimize environmental risks associated with nuclear power plants. In accordance with our business conduct the Bank seeks to avoid financing of or participation in any transactions or projects which put the environment at risk of lasting substantial detrimental effect (e.g. negative effect on pollution of land, air or waters). The Group aims to avoid the mobilization and canalization of nuclear energy business (as to financing, advisory or other banking services, participation, investment funds focusing on nuclear energy).

The norm affects all Bank's business - lines and activities. Stakeholders are:

- All Compliance Officers (as main stakeholders) responsible for financial sanctions and sensitive business.
- All relationship departments (e.g. Front, Mid, and Back-Office)
- All product and credit risk departments
- All departments executing transactions.

The Responsibility for the document lies with Compliance.

The document is prepared on the following regulatory/legal framework:

- Convention on the Physical Protection of Nuclear Material, as amended (CPPNM) (Vienna, 1979)
- Convention on Early Notification of a Nuclear Accident (ENC) (Vienna 1986)
- Convention on Assistance in the Case of a Nuclear Accident or Radiological Emergency (NARE) (Vienna, 1986)
- Convention on Nuclear Safety (NS) (Vienna 1994)
- Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (RADW) (Vienna 1997).

Raiffeisen Bank International's Policy was transposed at the Bank's level by Compliance Directorate and is a result of alignment between Compliance Directorate and its main stakeholders which are responsible for sensitive business.

To make the document available to its key stakeholders, the Norm regarding the clients that activate in the field of Nuclear Energy is published internally in an internally shared database (Intranet). Furthermore, the Bank published its position statement on Nuclear Energy on its website under [Code of Conduct](#) section.

## ESG Risk Framework

The policy describes how ESG relevant topics are to be reflected within the risk management area, among others relate to: ESG Risks in Corporate Lending process - reflects the inclusion of ESG within the corporate lending process, financed emissions calculations, ESG in early warning system (EWS). The mentioned framework has a specific monitoring process.

The policy outlines the comprehensive approach to identifying, measuring, and managing ESG risks while also detailing the relevant processes and governance structures in place. It is applicable to employees working within the risk area, and across all business lines.

Relevant stakeholders:

- Group Risk Controlling and Portfolio Management
- Sustainable Finance in Corporate Business
- Business Units
- Financial Analysis and Rating Department.

Group Risk Controlling and Portfolio Management is accountable for the implementation of the policy.

The policy is prepared in line with Raiffeisen Bank International 's framework that is following regulatory/legal framework: ECB Guide on Climate and Environmental related risks.

The Policy is a result of alignment between risk area and business area.

To make the Policy available to its key stakeholders, the policy is sent internally to all the relevant stakeholders.

## ESG considerations in the Bank's internal documents transposing the Raiffeisen Bank International Group ESG Rulebook

To help its customers improve their carbon footprint and make their transformation a sustainable success, the Bank needs to be able to assess transactions and projects on the basis of ESG criteria and advise its customers accordingly. In 2020, it adopted a harmonized definition of sustainable customers and transactions aligned to the one used by Raiffeisen Bank International Group ESG Rulebook. The Bank implemented in the Corporate Deal Flow documentation specific elements that refer to Sustainable Finance. The document sets out definitions for sustainable customers and sustainable transactions within the Bank.

Based on the Bank's Corporate Deal Flow and the Raiffeisen Bank International Group ESG Rulebook policy, the Bank is performing the ESG flagging process for financial products within Corporate and Institutional customer segments (including Financial Institutions, Sovereigns and LGRs), to be further documented.

Regarding Private Individuals customers, the flagging and reporting are made in compliance with the framework for green and social loans- retail, included in the Bank's internal product norm.

For SME customers, additional to internal norm and procedures, the Bank has adopted and integrated the framework for green and social loans- retail. For some specific SME transactions, green loans, we collect and repost ESG information, but the assessment is made at product level Term Loan Invest ESG.

The assessment and flagging was transposed at Raiffeisen Leasing IFN SA's level only through the Raiffeisen Bank International Green perspective, in regard with the category of the financed assets, electric or hybrid: electric cars, hybrid cars with low emissions (below 50 CO<sub>2</sub> g/km), photovoltaic panels, and electric equipment, including forklifts, agricultural machines, loaders, dumpers. The flagging is performed for new financing transactions and is being managed through data warehouse.

The responsibility for transposing locally the policy and for amending the transposing documents lies with Sustainable Finance for corporate portfolio, with SME Sustainability Ambassador for SME portfolio. with the Private Individuals Sustainability Ambassador for the private individuals portfolio and with Raiffeisen Leasing IFN SA for leasing portfolio.

The Bank's transposing documents, similar to Raiffeisen Bank International policy are based on Loan Market Association guidelines, ICMA principles, the EU Taxonomy regulation as well as market practice in relation to anti-greenwashing processes.

To make the provisions of the documents transposing Raiffeisen Bank International Policy available to its key stakeholders, the documents are published internally on the Intranet.

## ESG in Corporate Underwriting

The Bank implemented ESG in Corporate Underwriting requirements in form of a Procedure and the related Annexes. The procedure describes which type of ESG-related information the corporate risk manager via its risk statement transfers to the credit decision maker and in which cases dependent on a combination of customer & industry environmental score the corporate risk manager undertakes a more detailed analysis of the customer's business model and how it is affected by environmental risks.

The procedure provides regulations for the corporate risk manager / underwriter how to report & (partially) assess environmental risks the customer might be exposed to. Relevant stakeholders are: Account Managers, Product Managers, Risk Managers involved in Corporate & Specialized Lending.

All Stakeholders are accountable for the implementation of the procedure in accordance with their specific role. The procedure has considered the following regulatory/legal framework:

- ECB Guide on Climate and Environmental related risks
- EBA Guidelines for Loan Origination & Monitoring
- EBA Report on ESG Risks Management & Supervision
- FMA Guide for Managing Sustainability Risks

In addition, the Bank has considered other relevant information provided by the Group.

The procedure is aligned with all relevant process stakeholders.

To make the Procedure available to its key stakeholders, the procedure is published internally on the Intranet.

## The Bank's Corporate Deal Flow procedure transposing the Raiffeisen Bank International ESG Process Flow Corporates

The Bank's procedure describes how ESG risks are addressed by the first and second line of defence (as the third line of defence audit is regulated in the respective audit policies).

It provides an overview of the ESG process steps to be taken on the business and risk management side, to incorporate ESG risks. Relevant stakeholders are: Account Managers, Product Managers, Risk Managers, Credit Analysts.

All stakeholders are accountable for the implementation of the procedure according to the assigned roles.

The procedure follows Raiffeisen Bank International group wide policy and standards prepared considering as regulatory/legal framework: ECB Guide on Climate and Environmental related risks.

The procedure is aligned with all relevant process stakeholders (business and risk).

To make the procedure available to its key stakeholders, the procedure is published internally in an internally shared database (Intranet).

## Policies for assets under management (S.A.I. Raiffeisen Asset Management S.A.)

At the S.A.I. Raiffeisen Asset Management SA level, the Policy on the integration of sustainability risks in the investment and risk management process was developed and implemented. This policy was approved by the Management Board of S.A.I. Raiffeisen Asset Management SA and it should be updated whenever it is necessary.

This policy defines the general framework regarding the integration of sustainability risks in the investment process and risk management for the investment funds and the pension fund managed by S.A.I. Raiffeisen Asset Management SA.

S.A.I. Raiffeisen Asset Management SA constantly monitors the relevant aspects related to the issuers in which it invests on behalf of the funds under management, including: strategy, performance, financial and non-financial risks, capital structure, social impact, environment impact and corporate governance. The relevant aspects are those likely to significantly influence the company's ability to create long-term value or that may impact its financial solidity and include both financial and sustainability aspects.

Within the sustainability component, the objective is to identify the potential risks in terms of environmental and social factors as well as those regarding corporate governance, but also the opportunities that can derive from these factors. S.A.I. Raiffeisen Asset Management SA believes that these factors can have a significant impact on the performance of companies in the medium and long term.

In this sense, S.A.I. Raiffeisen Asset Management SA analyses to what extent the management team effectively manages the impact of these factors on the company's activity, including through a high degree of transparency in this field. Poorly managed ESG risks can lead to inefficiencies, operational disruptions, litigation and reputational damage, which can ultimately affect the issuer's ability to meet its financial obligations.

For all funds under S.A.I. Raiffeisen Asset Management SA administration, it is prohibited to invest in shares or bonds of corporate issuers involved in the production of controversial weapons. Also, S.A.I. Raiffeisen Asset Management SA will not invest directly in corporate issuers involved in the following activities:

- coal production/extraction, processing or transport of this fossil fuel;
- investments that can facilitate speculation on food products, respectively financial instruments derived from agricultural products (e.g. meat, cereals, sugar, coffee, etc.)
- the production of anti-personnel land mines,
- the production of chemical and biological weapons,
- the production of cluster munitions
- the use of depleted uranium for the purpose of manufacturing nuclear weapons.

## **Own operations**

### **Management**

The Group continuously strives to improve the main environmental parameters in the most relevant areas. In general, energy efficiency, renewable energy and environmentally friendly mobility are particularly important in the Group's own operations. In terms of its carbon footprint, energy consumption/building management, material consumption and mobility are the most important areas of action. These are also crucial with regard to achieving the climate targets.

Considering the wide range of impacted areas, the responsibility for implementing the policies and actions and evaluating the degree of target attainment lies with multiple stakeholders such as ESG & Sustainability Directorate, Logistic and Facility Management Department, IT Core, Acquisition and Engagement Tribe. The task of the ESG & Sustainability Directorate is to pass on new findings with regard to greenhouse gas emissions and the environmental effects of the main impact categories from Raiffeisen Bank International to the Bank's responsible departments. Relevant employees are informed on the key action areas and information is available on the intranet. The main objective of all the actions taken is to reduce CO2 emissions.

The Bank's due diligence process is diversified and includes compliance with Supplier Code of Conduct as minimum requirement, and among other aspects, compliance with internationally recognized standards, building certification and environmental labels, if the case. In addition, energy audits for the Bank are performed in line with Romanian legislation on energy efficiency.

### **Environmental key aspects in the ESG and Sustainability policy**

The Bank approved its own ESG and Sustainability policy in 2024, which includes details on the environmental key action areas for own operations. Among other areas, it is committed to continuously improving its environmental performance, and as far as possible and reasonable with the observance of the legal requirements. In addition, the policy sets out that in the "environment" area the Bank has defined the carbon footprint/ GHG emissions, energy efficiency and renewable energy as well as responsible use of resources as material. This is intended to ensure that the commitment to sustainability is specifically focused on where the Bank has the biggest influence via its office locations. The environmental section of the policy will be continuously revised and extended, in line with new developments and the latest scientific findings.

The active communication and involvement of stakeholders such as internal and external experts to inform the policy content, Logistics and Facility Management for implementation of actions and data collection, as well as sustainability experts to ensure regular adaptation, are part of the process. The policy is sent internally to all the relevant stakeholders in the Bank.

### **Policy on business travel**

The Bank's policy on business travel contains rules for travelling to events and conferences and defines general conditions for business trips. This applies to the whole Bank. To save costs and protect the environment, business trips should be replaced by available technologies, such as web and video conferences, where possible. The mode of transport to be used should result in the lowest costs, taking travel time into consideration. Furthermore, environmentally friendly means of transport (e.g. public transportation) are preferred.

## E1-3: Actions and resources in relation to climate change policies

### Value Chain

#### Corporate and Institutional customers

One key goal for the first pillar of the sustainability strategy with focus on climate & environmental is to align the Bank's balance sheet to the goals of Paris Agreement. The Bank identifies and measures impact in terms of financed emissions. This allows it to recognize new business opportunities on one hand while on the other hand setting measures to mitigate harmful effects on the climate and the environment, thus aiming to an overall more sustainable business composition.

In a first step, the Bank runs the assessment both at portfolio and counterparty level, on a qualitative and quantitative basis across the various customer types and industries. The goal is to identify both risks and opportunities and to create the conditions for potentially necessary management of sustainability risks at customer and industry levels. At this stage at portfolio level, the Bank relies on the results of materiality assessment and impact analysis and the financed emission calculation. At counterparty level, the Bank focuses on the ESG counterparty assessment and includes its considerations in its lending process.

The Bank intends to develop sectoral strategies as another tool for the steering process. In Phase 1, customers will be classified in three clusters: the restrictive cluster designates customers for whom the business relationship is earmarked for phase-out if they fail to transition to sustainable business operations; the transformative cluster designates customers which the Bank supports with new financing in their transition journey; the supportive cluster is for customers who are already operating sustainably. In Phase 2 the Bank plans to design engagement criteria and quantitative targets. The credit policy and the lending process are included in the steering process. The credit policy currently reflects the minimum ESG criteria and guidelines in accordance with the latest ESG risk developments. The lending process includes ESG-relevant aspects in the three lines of defense-model for the corporate segment.

Further approaches for steering are green budget, ESG incentives under the Green and Sustainability Bond allocations.

The goal of ESG finance planning is to obtain realistic and generally accepted ESG budgets, based on actual developments of the current year in comparison with the developments forecast for markets and competitors. By having an ESG budget and comparing it with the overall budget, the Bank will be able to adapt and to adjust e.g. funding plans as well as to steer ESG key performance indicators (KPIs) such as the Green Asset Ratio much better.

The Bank's Sustainability Bond Framework is at the core of the bank's sustainability efforts by strategically investing in projects that contribute to the transition to a green and sustainable economy. The Bank has been a pioneer in the local market by issuing the first bond in green format back in 2021 as well as the first sustainable bond in 2022, expanding the Bank's commitment from

financing green investment projects to include also social financing. As of December 2024, the Bank issued bonds in green and sustainable format in amount of approximately 1 bn EUR. For details regarding the use of proceeds, please refer to the latest published [Sustainability Bond Report \(April 2024\)](#) available on its website.

As this is an ongoing process, no specific time horizons are defined for completing this action.

#### Sustainable financing

Providing sustainable financing generates added value for the Group customers and supports a variety of societal activities that are suited to sustainable financing. The Group describes financing as being sustainable when it has a long-term positive impact on the environment and climate and/or on societal and social issues, and when it supports the attainment of the Sustainable Development Goals (SDGs).

Bank-wide uniform definitions of sustainable transactions and products are set out in the Bank's internal documents transposing Raiffeisen Bank International Group ESG Rulebook, Raiffeisen Bank International ESG definitions and the greenwashing prevention check for lending and non-lending financial products. The Bank's transposing documents, similar to the Raiffeisen Bank International policy are based on the Loan Market Association guidelines, the ICMA principles and the EU Taxonomy Regulation, as well as market practice in relation to anti-greenwashing processes.

The total volume of green financing (limited to financing with a positive impact on the environment and the climate and ESG-linked financing) for corporate customers at Group level in 2024 was in amount of RON 3,516,112 thousands as at 31 December and represented around 15% of the total Group corporate business line portfolio. Of this amount, customers have utilized financing lines amounting to RON 3,281,669. thousands addition, there was an unutilized line of sustainable financing of RON 234,443 thousands.

### E1-3: Actions and resources in relation to climate change policies

#### Sustainable financing – corporate and institutional customers

in RON thousands	31 December 2024	
Financing with a positive impact on the environment and the climate	3,068,168	87 %
ESG-linked financing	213,501	6 %
<b>Subtotal (utilized line)</b>	<b>3,281,669</b>	<b>93 %</b>
Unutilized line	234,443	7 %
<b>Sustainable financing</b>	<b>3,516,112</b>	<b>100 %</b>

Breakdown of sustainable financing by category:

#### Sustainable financing – corporate and institutional customers

in RON thousands	31 December 2024	
Sustainable real estate	2,455,821	70 %
Renewable energy	291,883	8 %
Energy efficiency measures	-	- %
Sustainable mobility	159,629	5 %
Water supply, sewage treatment and waste management	160,835	5 %
Sustainable forestry and farming	-	- %
Manufacturing industry	-	- %
ESG KPI-linked loans	213,501	6 %
ESG Rating-linked loans	-	- %
<b>Subtotal (utilized line)</b>	<b>3,281,669</b>	<b>93 %</b>
Unutilized line	234,443	7 %
<b>Sustainable financing</b>	<b>3,516,112</b>	<b>100 %</b>

The total volume of sustainable financing for corporate customers at Bank level in 2024 was around RON 4,950,040 thousands as at 31 December and represented around 24 per cent of the total Group corporate business line portfolio split in green portfolio RON 3,281,670 thousands and social financings RON 1,668,380 thousands.

The volume of ESG financing (electric vehicles and photovoltaic equipment) for Raiffeisen Leasing Romania in 2024 represented around 11.5 per cent out of total leasing portfolio. For 2025 Raiffeisen Leasing Romania aims to continue granting ESG financing and monitoring its percentage out of new financing volumes.

As this is an ongoing process, no specific time horizons are defined for completing this action, mainly the provision of sustainable financing.

#### Sustainable real estate

Real estate and construction are among the key industries closely monitored by the stakeholders involved in low-carbon economy and sustainable finance. In consequence, the Bank is dedicated to fulfilling its role in this sector, not only by following the market trends, but also by developing sector-specific strategies that reflect its commitment to sustainability. As a result, the Bank is applying the principles defined by Raiffeisen Bank International's inclusion of the Real estate and Construction sectors in the Sectoral Policy, with the main goal of defining the categories (supportive, transformative, restrictive) for the transition to a net-zero economy.

In 2024, the volume of financing utilized by corporate and institutional customers at the Bank level in the area of sustainable real estate was in amount of RON 2,455,821 thousands as of 31 December. This represents 70% of the volume of sustainable financing (limited to financing with a positive impact on the environment and the climate and ESG-linked financing) of RON 3,516,112 thousands utilized by corporate and institutional customers.

#### Retail banking

In line with the sustainability strategy with a focus on climate and environment and its first pillar, one of the key targets of retail banking is to enhance the green loan offering to Bank's retail customers.

Bank's focus is on supporting its customers in their green transition and becoming their first choice for retail ESG products. The Bank has developed solutions which aim at better assessing customers' carbon footprints and has provided products with an environmental and social impact that, for the first time, allow retail customers to receive a superior supply of sustainability-oriented solutions. The Bank aims to further increase new green sales to private individuals and small-business customers, and therefore offer expertise to its customers on the possibility of green secured or unsecured purpose loans, (i.e. loans with a

distinctive purpose to improve energy efficiency of properties; the purpose of the loan must be validated through the approval process) and green mortgage loans (secured by real estate and are made available exclusively to finance or refinance, in whole or in part, new and/or existing transactions with a specific use of proceeds as defined by the framework for green and social loans).

For 2024, 39 per cent of Bank's new mortgage loans volume was used for buildings with energy performance certificates class A or superior so as for 31 December 2024, 27 percent of Bank's total mortgage portfolio is represented by buildings with energy performance certificate class A or superior.

The Bank is committed to integrating sustainability into its retail banking operations. A summary of key goals is available below:

- Offer green loans and ESG-focused products: aiming to increase the availability of green mortgages, secured or unsecured ESG loans, and other environmentally and socially responsible products for its retail customers.
- Help customers with their ESG transition: develop resources and tools to empower its retail clients on their sustainability journey.
- Educate the retail staff on ESG: the Bank is committed to training its employees on ESG principles and their impact on retail banking, allowing them to better assist customers.

### **Prevention of greenwashing and negative ESG impacts**

To address the topics of negative ESG impacts and greenwashing prevention within sustainable finance transactions for corporate portfolio, the Bank has implemented different processes in Corporate Deal-flow which include the ESG expert opinion, greenwashing prevention check as well as the establishment of an exclusion list of all corporate activities in which the Bank does not wish to be involved. In addition, in 2025, Corporate Relationship Managers will receive regular training on identifying certain signals which indicate that certain activities and sectors are particularly critical from a sustainability perspective.

#### **ESG expert opinion**

For ESG critical transactions, particularly projects, an ESG expert opinion has to be issued. The ESG expert opinion evaluates the ESG impact of the transaction at project level and assesses its impact on the environment and social issues. It also includes a qualitative assessment and presents a conclusion on whether or not the transaction should be pursued from an ESG impact point of view. Consequently, the ESG expert opinion provides decision makers with more detailed information and enables them to consider ESG impacts in their lending decisions. It therefore plays a key role in preventing negative impacts from an ESG perspective. The assessment in the ESG expert opinion takes the following aspects into account: industry impact based on the PRB Impact Radar; company and project-related negative impact on key sustainability issues and their mitigation measures; past and current controversies and incidents; the legal environment (i.e. whether high environmental and social standards are ensured through EU regulations).

For critical cases, the ESG expert opinion is issued by Sustainable Finance. To formalize and standardize the process, an ESG expert opinion tool has been set up internally and a workshop was held to train local ESG experts on how to write an ESG expert opinion and how to navigate through the tool.

#### **Greenwashing prevention check**

The Bank has established a process to prevent greenwashing and has rolled it out across the business lines by transposing the Raiffeisen Bank International ESG Rulebook. Under the greenwashing prevention check, the Bank commits to certain internal process steps, which must be complied with in the event of a sustainable transaction with a customer. In particular, ESG experts from sustainable finance department are involved in the bid phase, the decision phase and the execution phase of a sustainable financing transaction. The greenwashing prevention check focuses on the structure of sustainable financial products, including products that are designated as green, social, sustainability-linked or similar. For the definitions of sustainable business transactions, standards such as the Loan Markets Association guidelines, the ICMA Principles and the EU Taxonomy Regulation were applied. These are used for qualification and (de)flagging of business transactions and form the basis for the greenwashing prevention process. In other words, the greenwashing prevention check is a precondition for the Bank's involvement in sustainable finance products and must therefore be followed. The check is applied for all sustainable finance products. By involving the ESG experts in ESG transactions, the Bank provides a further supervisory body to minimize greenwashing risks and contribute to greenwashing prevention.

#### **Raising awareness**

It is key to raise awareness of ESG-related topics in the business units, to build up ESG knowledge internally and to ensure efficient cooperation within the Bank. Accordingly, Corporate and Retail ESG Ambassadors roles have been established. ESG ambassadors in both Corporate and Retail are actively participating in the established knowledge-sharing hubs within the Group. The primary objectives are to pass on knowledge and information, to advertise ESG activities for corporate and SME customers, and to gather

expertise to support these companies so that they can leverage the opportunities available to them in the area of ESG trends and combat global climate change to the possible extent. Besides the basic ESG e-learning modules, there are available business-specific training on subjects such as EU Taxonomy compliance, current developments, as well as on the various ESG and sustainability-related products. In addition to the onboarding and in-house upskilling of the relationship managers, Corporate ESG Ambassadors also offer support during appointments with customers on the question of sustainable financing. Through this close cooperation, the Bank is striving to establish a standard for day-to-day business on the subject of sustainable financing.

## Own operations

### Environmental actions

A variety of options are available to enhance sustainability within the Group. These range from building management, reduction of energy consumption measures and increasing the share of energy from renewable sources, to mobility, use of recycled materials and staging information campaigns for employees.

In this regard, for 2024 the entire quantity of electricity purchased directly by the Bank was electricity produced from renewable energy sources with guarantees of origin. Many actions are ongoing processes, such as energy-efficient adaptations for heating and cooling or lighting systems. An overview of a number of key actions as well as their implementation can be found in the table below.

The implementation rate of the various measures is consistently high, especially in the field of energy saving and energy efficiency. This provides an important contribution to climate protection and additionally reduces costs at the Bank's sites. Bicycle storage facilities are offered at the headquarter and part of the sites to encourage alternative transport and reduce CO2 emissions associated with business trips and travel to work. Awareness, training and information for employees are also offered on internal platforms to improve responsible conduct with focus on climate protection and heighten the commitment to sustainability issues within the Bank.

Actions in the environmental areas that are relevant for the Group are outlined in the overview below:

Energy savings and efficiency	external energy audit
	LED & light sensors in common areas
	IT & printing equipment with energy labels/ environmental standards
	adaptions in heating/cooling
	adjustments in building envelope
Renewable energy	purchasing renewable electricity
Fleet. Business travel & commuting	bicycle parking spaces
	CO2 reduction measures
	e-vehicles, hybrid vehicles
Paper	measures for reducing consumption
Waste	measures to waste reduction
	waste separation
	increase of reuse and recycling
	waste management
Employee information	awareness initiatives via internal channels and training

## E1-4: Targets related to climate change mitigation and adaptation

### Value chain

#### Lending portfolio (non- financial corporations)

The Bank's financed emissions targets are at the first stage set for non-financial corporations and were developed under the larger Raiffeisen Bank International umbrella target setting.

The backbone of net-zero emissions is the Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (the IPCC). Financial institutions should establish their emission reduction targets in line with category C1 of the AR6, i.e., 1.5°C pathway with no or limited overshoot (Working Group III Table SPM.2). Raiffeisen Bank International's and implicitly the Bank's approach for setting targets as defined in chapter [E1-1: Transition plan for climate change mitigation](#) involved following considerations, guidelines, and components: in order to set science-based targets and be compatible with limiting global warming to 1.5°C, were considered diverse range of climate scenarios to detect relevant environmental, societal, technology, market and policy-related developments and determine decarbonization levers. Were also considered the Emissions Gap Report (2023) by the United Nations Environment Programme, as a part of the framework. Accordingly, Nationally Determined Contributions in the United Nations Framework Convention on Climate Change (UNFCCC) and National Energy and Climate Plans Member States submitted to the EU Commission repositories were examined. Romania's national pledges demonstrate the country decarbonization paths. The Bank analysed the national pledges when developing the financed emissions target and decarbonization pathway.

Two main approaches exist for setting financed emissions targets: overarching target also known as the Absolute Contraction Approach and the Sectoral Decarbonization Approach (SDA). The overarching target is a one-size fits all approach that enables companies to reduce their absolute emissions values in line with global decarbonization pathways while the SDA entails carbon-intensity metrics. Both approaches have own benefits and limitations. As a starting point, the Bank as part of Raiffeisen Bank International which opted for the overarching target and set it for the non-financial corporations portfolio in line with 1.5°C pathway.

The scenario chosen is the Net Zero Orderly Transition scenario of the Network for Greening the Financial System (NGFS). The NGFS, a group of central banks and supervisors, develops their scenarios phase-by-phase, and their scenario of the current phase (Phase 4) was Applied. To note, the NGFS provides several scenarios that include different projections such as delayed transition, or a global warming significantly below 2°C, etc. the Bank follows Raiffeisen Bank International's choice, in line with 1.5°C pathway

requirement, for the Net Zero Orderly Transition scenario which is an ambitious scenario that limits global warming to 1.4°C in line with AR6 of the IPCC. At the time of the IPCC AR6, the NGFS scenario, then having its phase 2, was an acceptable scenario as referenced by the IPCC. Phase 4, published in late 2023, follows the same structures while offering more granularity. In addition,

the International Monetary Fund, in cooperation with the NGFS, curated NGFS phase 4 scenarios and published them at their climate change dashboard. This enabled a country-specific view of the GHG emissions as a combination of CO<sub>2</sub> and non-CO<sub>2</sub> emissions (non-CO<sub>2</sub> emissions are other gases under the Kyoto Protocol in NGFS). Raiffeisen Bank International will continue to follow up the next phases released by the NGFS (e.g., Phase 5) and the Bank as part of Raiffeisen Bank International group may apply them in the next periods.

The NGFS scenario draws upon integrated assessment models. These are scientific models that provide links to societal structures, economic facts and projections, and they also take biosphere and atmosphere into account. This synthesizing approach is based on human-earth interplay. Hence, although the granularity of the SDA on specific sectors was considered, the option was for overarching target based on the NGFS scenario due to an extensive lack of other industries under the current SDA framework and inadequate information about GHG guidance. It should also be noted that the NGFS scenarios, in themselves, and as stated by the NGFS, consist of sectoral granularity to an extent that is above average compared to other scenarios assessed by the IPCC AR6 (see [NGFS scenarios](#), p.4). The main categories under the integrated assessment models are energy-industries, transportation, and buildings. As is the case with several other scenarios, the NGFS scenario, too, projects immediate action and significant changes to the energy mix. The scenario's immediacy can be noticed through the sharper decreases in projected CO<sub>2</sub> emissions by 2030 and 2035, having a time-path until 2050 where net zero scenarios are to provide 0 or lower net CO<sub>2</sub>. The IAM taken as a model by Raiffeisen Bank International under the NGFS Net Zero scenario is MESSAGEix-GLOBIOM. Raiffeisen Bank International will continue to explore sectoral approaches, also keeping its stance that they will extend and develop further. In Raiffeisen case, although it assumes alignment of the portfolio with country-specific macroeconomics, overarching target fits the case for the beginning of this dynamic process as the portfolio does not carry significant exposures in sensitive industries such as thermal coal and oil upstream. The baseline year has been determined as the year of our financed emissions disclosure, and the data used was the NGFS scenario curated by the International Monetary Fund in order to apply the decarbonization path toward the target year 2030. GHG gases, in addition to carbon dioxide include Kyoto gases under both NGFS scenario and PCAF standards.

Pursuant to these considerations and having the possibility to have country-specific data, global decarbonization paths based on the portfolio approach were applied, as the underlying modelling entails the above-mentioned sectoral consideration. This cross-sectoral approach enables to project GHG emissions for the target year in line with 1.5°C pathway required by CSRD. These levers are expected to contribute to achieving the Bank's GHG emissions reduction target in line with group policies as they reflect cross-sectoral projections on the basis of weighted exposure. The Bank approved the target as 21.6 per cent financed emissions reductions for the non-financial corporations portfolio in line with Raiffeisen Bank International targets calculation.

In the target approval process the Bank involved all stakeholders such as Corporate Business, Risk Management, and the Sustainable Finance team, and finally its Management Board approved these targets. The Bank supports Raiffeisen Bank International approach aimed to follow best practices and knowledge in the industry through this approach noticing that physical emission intensities, although widely used, do not guarantee the same percentage of decrease in financed emissions that employ a different metric (kgCO<sub>2</sub>e/t Euro) instead of e.g., kgCO<sub>2</sub>e/kg steel). This might lead to a significantly unexpected outcome such as non-decreasing or inadequately decreasing financed emissions while even physical emissions or their intensities flow as projected. Another risk point is the volatility and non-comparability of the Partnership for Carbon Accounting Financials (PCAF) standards to date.

As the scenarios for decarbonization do not provide specific guidance for scopes, other than scope 1 (e.g. IEA NZE 2050), a pro-rata decarbonization share was applied for the other scopes (E1-4.33). Although Scope 3 is considered more vulnerable to volatility and double-counting, in that respect, targets are set including Scope 1 and Scope 2 at this time E1-4 34b and MDR-T 80c. The Bank will continue with the development of sectoral approaches which will be used for internal steering particular to the non-financial corporations portfolio.

Pursuant to the target setting disclosed in line with the 1.5°C pathway under the IPCC and in line with CSRD provisions, the Bank will track and report its financed emissions and their intensity (in kgCO<sub>2</sub>e/t €) in the next years to disclose how the portfolio is developing based on the initial settings towards the target year 2030.

#### **E1-4 Targets related to climate change mitigation and adaptation**

##### **Bank's reduction target of from 2023 to 2030.**

	<b>2030</b>	<b>2050</b>
Cross-sector (ACA) reductions pathway based on the year 2023 as the reference year	21.6 %	- %

It should be noted that the targets set attribute to covered emissions for the the Bank's non-financial corporations lending portfolio (see Section E1-6). For the 2023 baseline year, Scope 1 and Scope 2 total financed emissions for the lending portfolio of the non-financial corporations were: 666,053 TCO<sub>2</sub>e. The relevant financed emission intensity for 2023 is: 178 kgCO<sub>2</sub>e/ThsEuro.

The published figure of the Bank's financed emission in 2023 sustainability report is not comparable to the starting point mentioned above, due to the updating of calculation methodology; the PCAF database from September 2024 is now mainly considered. Therefore, in order to achieve comparability, the baseline year 2023 as the starting point for reduction targets has been recalculated with the updated methodology used for year-end 2024.

In line with Bank's Sustainability Strategy, in the Responsible Banker pillar, we aim to support our customers in their climate and environmental transition. For this, the Bank is monitoring the sustainable financing granted in line with Raiffeisen Bank International ESG Rulebook, as implemented in Bank's procedures, observing the criteria for both green and social financing. In this respect, specific target related to the share of sustainable finance in total Bank's yearly corporate portfolio was set for 2025: sustainable financing to represent 24 per cent of the total Bank's corporate portfolio. The target setting process involved Project Finance, the Sustainability Steering and the Management Board for target approval.

##### **Retail mortgage loans**

The Bank is part of Raiffeisen Bank International process that started to calculate the baseline of the financed emissions for the year 2024; this includes residential real estate. This will serve as a basis for future plans regarding emission target setting. However, before setting a target, Raiffeisen Bank International and the Bank deems a monitoring period of at least one year necessary, engaging with the stakeholders and thoroughly understanding the drivers as well as uncertainties in the data, in order to ensure the stability and consistency of the methodology and the results. In light of these points, the Bank plans to include retail mortgage financed emissions in overall financed emissions targets latest in 2026.

## Own operations

In alignment with the 1.5° C target, Raiffeisen Bank International has set a reduction pathway for own operations CO<sub>2</sub>e emission in Scope 1 and 2 aiming to achieve a 42% decrease until 2030. The CO<sub>2</sub> emission reduction target for own operations is used to steer towards more sustainable business practices. The Group is engaged in contributing to Raiffeisen Bank International 2030 targets achievement. Due to the expansion of Raiffeisen Bank International's and local consolidation scope for reporting in 2024, this year has been set as the new baseline. Comparisons to previous years or maintaining previous targets set are therefore not possible.

## E1-5: Energy consumption and mix

### Own operations

Due to the expansion of the consolidation scope for the reporting, 2024 year has been set as the new baseline for energy consumption. At 4,856 tCO<sub>2</sub>e GHG emissions, energy consumption of the Group accounted for around 0.18% of location-based emissions and was the biggest source of own operations related emissions for the Group. The emissions arose in Scope 1 in particular, but also in Scopes 2 and 3. The Group's total energy consumption was around 27,381 MWh in 2024. The average energy consumption per employee per year was 5.44 MWh. The Group's proportion of green energy was around 42%. In particular, for 2024 the entire quantity of electricity purchased directly by the Bank was electricity produced from renewable energy sources with guarantees of origin.

### E1-5 Energy consumption and mix

	<b>Group</b>
	<b>2024</b>
<b>Energy consumption and mix</b>	
Fuel consumption from coal and coal products (MWh)	7.432
Fuel consumption from crude oil and petroleum products (MWh)	4,539.288
Fuel consumption from natural gas (MWh)	9,009.666
Fuel consumption from other fossil sources (MWh)	0.472
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources (MWh)	1,685.645
<b>Total energy consumption from fossil sources (MWh)</b>	<b>15,242.503</b>
<i>Percentage of fossil sources in total energy consumption (%)</i>	<i>55.669 %</i>
<b>Total energy consumption from nuclear sources (MWh)</b>	<b>722.611</b>
<i>Percentage of energy consumption from nuclear sources in total energy consumption (%)</i>	<i>2.639 %</i>
Fuel consumption from renewable sources (MWh)	25.446
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	11,390.059
Consumption of self-generated non-fuel renewable energy (MWh)	0.000
<b>Total energy consumption from renewable sources (MWh)</b>	<b>11,415.505</b>
<i>Percentage of renewable sources in total energy consumption (%)</i>	<i>41.692 %</i>
<b>Total energy consumption excluding nuclear (MWh)</b>	<b>26,658.008</b>

## E1-6: Gross GHG emissions of categories Scope1, 2 and 3 as well as total GHG emissions

### Value chain

Since 2023, the Bank has calculated and published its scope 3 category 15 financed GHG emissions, i.e. the indirect downstream emissions associated with its lending and investment activities. This has been an important step in identifying sectors on which the Bank should focus in its efforts to mitigate the negative impact on the environment of its customers' activities.

The methodology applied is based on the PCAF standard – the most widely accepted, GHG Protocol-compliant standard for financed emissions calculations. With the 2024 year end publication, the scope of our calculations was enlarged by including the following for the first time:

- Scope 3 emissions from all sectors were taken in account when calculating the Group's financed emissions in order to account for the indirect upstream and downstream emissions of Group's customers, in accordance with the recommendation of the PCAF standard
- A first estimation of financed emissions associated with the mortgage asset class
- PCAF parameters from September 2024, including the inflation adjustment effect, have been used for the year-end 2024 financed emissions calculation for corporate exposures. Additionally, year-end 2023 financed emissions values and emission intensities for corporate exposures have been recalculated using the same updated PCAF parameters to ensure comparability of results across both reporting periods
- When calculating Sovereign emissions, calculation was adjusted so that it accounts for the impact of the purchasing power parity. This change has been a major driver in measured emission intensity increase between 2023 and 2024.
- Results are based on the IFRS scope of consolidation

An overview of the asset classes in scope for the year end 2024 calculations is provided below, with an indication of the coverage achieved in each asset class. Coverage of less than 100 per cent is the result of data gaps or due to financed emissions calculations according to the PCAF not being applicable to a specific asset category.

#### Share of the portfolio covered by the calculations

Financed emissions asset distribution and coverage in RON thousands	Gross carrying amount	Covered by financed emissions		Not covered by financed emissions	
	Amount	Amount	%	Amount	%
Central banks	12,219,369	–	– %	12,219,369	100 %
Central government	21,357,733	19,292,277	90 %	2,065,455	10 %
Credit institutions	974,000	645,587	66 %	328,413	34 %
Other financial corporations	1,398,791	1,378,534	99 %	20,257	1 %
Non-financial corporations	23,552,705	20,621,091	88 %	2,931,614	12 %
Households	20,033,024	8,354,827	42 %	11,678,197	58 %
Accumulated impairment	(1,253,790)	–	– %	(1,253,790)	100 %
Accumulated other comprehensive income	(86,856)	–	– %	(86,856)	100 %
<b>Financial assets excluding trading assets</b>	<b>78,194,976</b>	<b>50,292,317</b>	<b>64 %</b>	<b>27,902,659</b>	<b>36 %</b>
Other balance sheet positions	4,682,696	1,390,926	30 %	3,291,770	70 %
<b>Total assets</b>	<b>82,877,672</b>	<b>51,683,243</b>	<b>62 %</b>	<b>31,194,429</b>	<b>38 %</b>

In total, the Group's financed GHG emissions calculations covered 62% of the Group's total assets. (Covered exposures are defined as those gross carrying amounts which could be mapped to PCAF asset classes and for which calculation of financed emissions was performed successfully. PCAF asset classes cover exposures to loans and advances, debt securities and equity not held for trading from central banks, credit institutions, other financial corporations, non-financial corporations and household mortgage loans. The PCAF standard sets out requirements for determining the portion of customers' emissions that can be attributed to a financial institution. Customer specific GHG emissions data was used in the calculation where available. This data allowed a more precise assessment of financed emissions, but availability was still limited. Less than 1 per cent of covered exposure in corporate PCAF asset classes, scope 1 and scope 2 financed emissions were calculated based on the data collected from customers, while the remainder had to be estimated based on methodologies set out in the PCAF standard. The Bank is conducting an extensive data collection exercise in an effort to constantly improve the quality of our calculations. Estimates for customer scope 1, 2 and 3 emissions were derived using emission factors, representing average (physical or economic activity-based) emissions intensity values for specific industries and countries. The main source of emission factors was the PCAF database.

The PCAF asset class of vehicle loans, which are non-material to the Bank overall portfolio, was outside the scope of the calculations.

Avoided emissions have been reported separately and have not been added in total financed emissions, in line with the GHG protocol, there has been no netting with positive emissions from the portfolio. These are emissions that have been avoided by investing in renewable energy projects, compared to the emissions that would have been created in the absence of the respective project.

The gross carrying amount covered, excluding Central government, increased mainly due to initial recognition of the PCAF asset class Mortgages, in the financed emissions calculation. Due to increase in covered exposure financed emissions have increased compared to previous year figures. In addition, the PCAF parameters from September 2024 were applied in the latest financed emissions calculation for corporate exposures, having an additional net increase effect on the absolute level of emissions. Measured on a comparable population of PCAF asset classes (excluding the Mortgages asset class, which was not assessed in 2023), and applying September 2024 parameters to the previous year's exposures, customer scope 1 and 2 emissions slightly decreased over the previous comparable period. The value for the PCAF data quality score, measure of the quality of data used to estimate financed emissions, slightly improved to 3.5, which resulted from the aforementioned increased availability of customer specific GHG emissions data, offset by the inclusion of mortgage loans into the financed emissions calculation. Further details on the level of the data quality are provided in the table below showing the results of the calculation on the level of the PCAF asset classes.

Sovereign emissions were calculated according to the PCAF standard using emission factors available in the PCAF emission factor database. Sovereign scope 1 production financed emissions were disclosed twice, in line with the PCAF requirements, with the first calculation including the net effect of the land use, land use change, and forestry sectors, while this effect was excluded in the second calculation. The Scope 1 and Scope 2 results obtained amounted to 1,392,329 tons of CO<sub>2</sub>e if the net effect of Land Use, Land-Use Change, and Forestry was included, and 1,983,354 tons of CO<sub>2</sub>e if these sectors were excluded. Emission factors have been primarily sourced from the PCAF database and represent the emission intensity of the countries' respective economies (GDP expressed in purchasing power parity terms) was considered for the first time in the 2024 reporting period). The high data quality score achieved reflected the good quality of the underlying data, obtained directly from the GHG inventories that countries regularly maintain. It is also important to highlight that, to some extent, the sovereign emissions can be expected to overlap with those of the Bank corporate portfolio, provided that activities at the source of the corporate emissions are located in countries and sectors covered by the national GHG inventories.

Financed emissions by PCAF asset class in RON thousands	Credit exposure		Credit exposure covered by emissions calculation		Financed emissions in thousand tCO2e		Emission intensity tCO2e/ in LCY		Weighted data quality (High = 1, Low= 5)	
	2024	2023	2024	2023	Scope 1, 2	Scope 3	Scope 1, 2	Scope 1, 2	Scope 1, 2	Scope 3
					2024	2024	2024	2023	2024	2024
Business loans and unlisted equity	20,474,567	-	20,021,369	-	710,406	1,947,516	35	-	3.4	3.5
Listed equity and corporate bonds	758,863	-	758,863	-	638	1,957	1	-	4.0	4.0
Commercial real estate	2,580,332	-	2,580,332	-	14,831	0	6	-	4.0	-
Project finance	-	-	-	-	-	0	-	-	-	-
Mortgages	8,332,120	-	8,312,901	-	37,833	0	5	-	3.6	-
<b>Grand Total</b>	<b>32,145,882</b>	<b>-</b>	<b>31,673,465</b>	<b>-</b>	<b>763,707</b>	<b>1,949,473</b>	<b>24</b>	<b>-</b>	<b>3.5</b>	<b>3.5</b>
Project finance, electricity generation – avoided emissions	235,897	-	235,896	-	31,721	-	134	-	-	-
Sovereign - incl. LU	19,773,881	-	19,773,881	-	1,392,329	0	70	-	1.0	-
Sovereign - excl. LU	19,773,881	-	19,773,881	-	1,983,354	0	100	-	1.0	-

The table above shows the results of financed emissions calculations including customers' scope 3 emissions for the PCAF asset classes business loans and unlisted equity, listed equity and corporate bonds, and project finance the Group would like to highlight that, the scope 3 financed emissions imply double counting of emissions in a bank's own portfolio. This is because some of customers' scope 3 emissions will already be accounted for in the scope 1 and 2 of other customers in cases where the latter has been part of the former's value chain – either upstream (as suppliers) or downstream (as customers).

The Group has been striving to stabilize the data quality, calculation framework and scope of own financed emission calculations. The Group also understands that the measure of PCAF data quality and the stability of financed emissions results have not been exclusively driven by own efforts, but also reflect the soundness and comprehensiveness of the data the Group depends on, namely customers' own disclosures and external databases. The Group expects corporate disclosures to progressively converge towards best practice and provide the most comprehensive coverage, supported by the improved harmonization of reporting requirements.

The table below shows the distribution of financed emissions by NACE sector classification within PCAF asset classes of business loans and unlisted equity, listed equity and corporate bonds, project finance, and commercial real estate. It should be noted that the emissions of the asset class Sovereign Debt are not included in the total sum of financed emissions in the table below, in order to avoid double counting of uncertain magnitude. The emissions of this asset class are transparently presented in the table Financed Emissions by PCAF Asset Classes.

Financed emissions by NACE sector in RON thousands	Credit exposure		Credit exposure covered by emissions calculation		Financed emissions in thousand tCO <sub>2</sub> e		Emission intensity tCO <sub>2</sub> e/ in LCY		Weighted data quality (High = 1, Low= 5)	
	2024	2023	2024	2023	Scope 1, 2 2024	Scope 3 2024	Scope 1, 2 2024	Scope 3 2024	Scope 1, 2 2024	Scope 3 2024
	Wholesale and retail trade; repair of motor vehicles and motorcycles	6,406,374	—	6,293,841	—	173,921	616,717	28	98	4
Financial and insurance activities	2,706,387	—	2,706,386	—	46,619	34,020	17	13	4	4
Manufacturing	3,154,224	—	3,131,825	—	234,629	221,635	75	71	3	4
Real estate activities	2,347,606	—	2,341,737	—	16,741	19,996	7	9	4	4
Transportation and storage	1,998,232	—	1,938,521	—	66,093	90,508	34	47	3	3
Electricity, gas, steam and air conditioning supply	1,567,447	—	1,565,405	—	77,558	509,629	50	326	2	2
Construction	1,356,468	—	1,339,928	—	10,728	43,874	8	33	4	4
Human health and social work activities	680,033	—	679,847	—	6,717	10,542	10	16	4	4
Mining and quarrying	552,924	—	552,501	—	28,664	300,222	52	543	2	2
Administrative and support service activities	570,169	—	569,596	—	5,072	10,353	9	18	4	4
Agriculture, forestry and fishing	617,230	—	537,261	—	38,759	17,619	72	33	4	4
Information and communication	616,274	—	581,503	—	3,472	6,425	6	11	2	2
Water supply; sewerage, waste management and remediation activities	382,480	—	379,513	—	4,476	19,211	12	51	4	4
Accommodation and food service activities	373,605	—	364,674	—	890	2,820	2	8	4	4
Professional, scientific and technical activities	321,820	—	318,705	—	11,063	45,009	35	141	3	3
Public administration and defence; compulsory social security	100,384	—	—	—	—	—	25	39	4	4
Arts, entertainment and recreation	21,660	—	20,861	—	136	349	7	17	4	4
Education	20,750	—	20,745	—	144	248	7	12	4	4
Other service activities	19,695	—	17,715	—	193	296	11	17	4	4
Activities of households as employers; undifferentiated goods- and services-producing activities of households for own use	—	—	—	—	—	—	—	—	—	—
Activities of extraterritorial organisations and bodies	—	—	—	—	—	—	—	—	—	—

In addition, distribution of the financed emissions calculation results is shown below distributed across the top ten countries by exposure. It should be noted that the emissions of the asset class Sovereign Debt are not included in the total sum of financed emissions in the table below, in order to avoid double counting of uncertain magnitude. The emissions of this asset class are transparently presented in the table Financed Emissions by PCAF Asset Classes.

Financed emissions by country in RON thousands	Credit exposure		Credit exposure covered by emissions calculation		Financed emissions in thousand tCO <sub>2</sub> e		Emission intensity tCO <sub>2</sub> e/ in LCY		Weighted data quality (High = 1, Low= 5)	
	2024	2023	2024	2023	Scope 1, 2	Scope 3	Scope 1, 2	Scope 3	Scope 1, 2	Scope 3
					2024	2024	2024	2024	2024	2024
AT	882,993	–	882,993	–	8,716	10,916	10	12	4	4
AE	281,569	–	281,569	–	43,291	20,934	154	74	4	4
BE	20,528	–	20,527	–	6	10	–	1	4	4
ES	34,524	–	34,524	–	8	30	–	1	4	4
GB	10,030	–	10,030	–	9	2	1	–	4	3
RO	30,569,513	–	30,099,988	–	711,296	1,915,099	24	64	4	3
LU	115,643	–	115,643	–	2	9	–	–	4	4
US	116,811	–	116,811	–	263	1,467	2	13	4	4
FR	79,531	–	79,531	–	16	205	–	3	4	4
SK	9,615	–	9,613	–	23	153	2	16	4	4
Rest of the world	25,125	–	22,236	–	77	648	3	29	3	2
<b>Total</b>	<b>32,145,882</b>	<b>–</b>	<b>31,673,465</b>	<b>–</b>	<b>763,707</b>	<b>1,949,473</b>	<b>24</b>	<b>62</b>	<b>4</b>	<b>3</b>

## E1-6 own operation

### Own operations

#### Greenhouse gas emissions from own operations

The data relating to own operations is collected for the Group which includes the Bank and the subsidiaries (Raiffeisen Leasing IFN SA, S.A.I Raiffeisen Asset Management SA, Aedificium Banca pentru Locuinte SA) In 2024 the consolidation scope had to be expanded in alignment with the CSRD.

In order to avoid double counting of GHG emissions reported under Scope 1, 2 or 3, taking into consideration that CIT ONE is both associate and supplier for RBRO and analyzing the share in the company and the share of business activity with the company as well as the availability of data, the Group approach was to consider CIT ONE from the supplier perspective, including GHG emissions related to services provided by CIT ONE under Scope 3.

In calculating GHG emissions, the Group used GHG Protocol standards approach, including in Scope 1 GHG emissions from stationary combustion, mobile combustion and fugitive emissions, in Scope 2 purchased or acquired electricity, steam, heat, and cooling consumed and in Scope 3 the categories referred in GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard

except for category 7- Employee commuting. Due to lack of available data this category of GHG emissions was not calculated and is not included in Scope 3 emissions, the Group intending to include it starting from 2025 sustainability reporting.

Quantitative data relating to own operations was collected using the "ESG Cockpit" software. The environmental indicators include data for both the Bank and Raiffeisen Leasing IFN, as the S.A.I. Raiffeisen Asset Management SA and Aedificium Banca pentru Locuinte subsidiaries are non-material due to their size and are sharing the office space with the Bank, so the energy and materials/ resources consumptions, as well as waste data, are included in the Bank's collected data. To enable optimal support for environmental management, the measures taken and the consumption data are regularly analyzed using appropriate company-specific key figures. One important way of achieving the environmental targets is to reduce consumption before emissions occur. Energy efficiency plays an important role in achieving this.

In 2024, the Bank as part of Raiffeisen Bank International, collected and disclosed cloud and data center service emissions for the first time in an effort to increase understanding and awareness of the connection between IT and sustainability. The granularity of the available data is expected to increase in the coming years as suppliers are increasingly able to break down emissions attached to their services. Details regarding the Scope 1, 2 and 3 emissions of own operations can be found in the total greenhouse gas emissions table below.

Data quality is collected on the basis of three grades: The best data quality is 1 (exact), followed by 2 (calculated) and 3 (estimated).

Average CO<sub>2</sub>e emissions (calculated using the emission factors ecoinvent) for 2024 for own operations amounted to 11,183 tons (t) (location-based). Of this total, 3,639 tons or 33% per cent of CO<sub>2</sub>e emissions are attributable to scope 1, 1,217 tons (11% per cent) to scope 2 (location-based).

## Total greenhouse gas emissions in detail

	2024
Scope 1 GHG emissions	
<b>Gross Scope 1 GHG emissions (t CO2e)</b>	<b>3,639</b>
Scope 2 GHG emissions	
<b>Gross location-based Scope 2 GHG emissions (t CO2e)</b>	<b>1,217</b>
<b>Gross market-based Scope 2 GHG emissions (t CO2e)</b>	<b>1,217</b>
Significant scope 3 GHG emissions	
<b>Gross Scope 3 GHG emissions (t CO2e)</b>	<b>2,681,674</b>
1. Purchased goods and services (t CO2e)	460
1a Cloud service (t CO2e)	420
2. Capital goods (t CO2e)	307
3. Fuel- and energy-related activities (not included in scope 1 or scope 2) (t CO2e)	2,248
4. Upstream transportation and distribution (t CO2e)	1,445
5. Waste generated in operations (t CO2e)	907
6. Business travel (t CO2e)	540
7. Employee commuting (t CO2e)	-
8. Upstream leased assets (t CO2e)	-
9. Downstream transportation and distribution (t CO2e)	-
10. Processing of sold products (t CO2e)	-
11. Use of sold products (t CO2e)	-
12. End-of-life treatment of sold products (t CO2e)	-
13. Downstream leased assets (t CO2e)	-
14. Franchises (t CO2e)	-
15. Investments (t CO2e)	2,675,347
<b>Total GHG emissions</b>	
<b>Total GHG emissions (location-based) (tCO2e)</b>	<b>2,686,530</b>
<b>Total GHG emissions (market-based) (t CO2e)</b>	<b>2,686,530</b>

The Group did not include any removals, or any purchased, sold or transferred carbon credits or GHG allowances in the calculation of Scope 3 GHG emissions. The Group's approach on GHG emission reduction and mitigating climate change did not consider carbon credits purchasing for the reporting year.

<b>GHG intensity per net revenue</b>	<b>2024</b>
Total GHG emissions (location-based) per net revenue (tCO2e/RON)	.0003 %
Total GHG emissions (market-based) per net revenue (tCO2e/RON)	.0004 %

The net revenues amounting to RON 4,100,655 thousands, which served as the basis for calculating the GHG intensity, are reported under operating income in the consolidated and separate statement of comprehensive income of the consolidated financial statements. It should be noted that the emissions of the asset class Sovereign Debt are not included in the total sum of financed GHG emissions in the tables above, in order to avoid double counting of uncertain magnitude. The emissions of this asset class are transparently presented in the table Financed Emissions by PCAF Asset Classes.

## Resource use and circular economy

### E5-1: Policies related to resource use and circular economy

#### Value chain

As a rule, the Group's approach to sustainable business practices is covered in the sustainability strategy with a focus on climate and environment. Furthermore, the Group is going to implement sectoral strategies to define supportive, transformative and restrictive criteria, including climate and circular economy aspects.

The targets and actions for the central topics of climate stability and circularity are to be defined by the business areas by 2026. These will be implemented through sectoral business policies.

For more details see the [Strategy](#) section ESRS2 MDR-P 65a-f

#### Own operations

Circularity and resource efficiency in the Group's own operations are covered in the ESG & Sustainability policy as well as in the Suppliers' Code of Conduct (see [G1 Business Conduct](#)). The Group is actively working on reducing the consumption of resources and increasing awareness among employees about reuse and recycling.

For more details see ESG & Sustainability policy section and [the Suppliers' Code of Conduct](#).

### E5-2: Actions and resources related to resource use and circular economy

#### Value chain

From a steering perspective, the E-score (an important component of the total ESG score) is already reflected in how the Bank's clusters its customers. The Bank has therefore set up the corporate underwriting process to include the E component. As a result, circularity also plays an indirect role.

As part of the sustainability strategy, where the focus is on supporting the Bank's customers in their climate and environmental transition, the Bank is supporting its customers with sustainable-finance products and expertise in order to reach the net-zero strategy and circularity topics.

The Bank portfolio encompasses circular economy transactions, and there is a discernible augmentation in our inclination towards recognizing and resolving such transactions.

To improve data collection in this area, circularity is included in the Bank ESG questionnaire as one of the main environmental aspects.

#### Own operations

Actions concerning the improvement of circularity, waste management and reduction of resource use in Group's own operations are taken mainly by IT, Logistic and Facility Management department as well as the Cards Squad and are aligned with ESG & Sustainability Directorate. These actions range from prolonging IT equipment use, switching from plastic bottles to water filtering equipment, reducing paper consumption, improving the waste management to replacing standard PVC with recycled PVC.

The Bank gradually replaces standard PVC cards with recycled PVC cards for new card production. With an average of more than 1 million cards issued annually, it intends to reduce the environmental impact of this process and contribute to a more sustainable future by using recycled PVC for new issued cards. This initiative diverts plastic waste from landfills and promotes the circular economy, where materials are reused rather than discarded. Since 2022 the Bank started replacing standard PVC cards with recycled PVC cards. For 2023, 20% of PVC used in new cards production was recycled PVC and for 2024, the Bank has increased the percentage of recycled PVC to 99,93% of the total amount of PVC used in newly issued cards, also raising awareness of this initiative to customers. The necessary financial resources are allocated for this action and provisioned in the contractual documentation for cards supply for which confidentiality clauses apply.

Furthermore, the Group continues with its efforts to prolong the use of IT equipment (mobile phones, laptops, desktops computers) and encourage its re-use once it is no longer required within the company. The number of IT equipment items procured per quarter in 2024, as well as equipment items leaving the company through reuse programs, are tracked internally.

While the Group has to take into account technical requirements and security, efforts are being made to extend the lifespan of IT equipment, in particular laptops, to reduce resource intake and maximize the usability of materials.

The actions support the Group's overall environmental goals and targets for energy efficiency and reduction of CO<sub>2</sub> emissions outlined in chapter [Climate change](#).

### **E5-3: Targets related to resource use and circular economy**

#### **Value chain**

Considering lack of data related to resource use and circular economy practices of its clients, the Bank was not prepared to define business – targets for this specific topic that resulted as material from portfolio indirect impact perspective. Considering the actions envisaged to improve data collection in this area, and the need to compile several years of clients' data, the Bank is considering defining resource use and circularity business-targets by the end of 2026.

#### **Own operations**

The targets for circularity align with the Group's overall emission reduction targets for own operations. Material use (specifically in IT and business travel) and waste contribute significantly to the Group's operations CO<sub>2</sub> footprint. It is therefore in the Group's interest to continually work on reducing the environmental impact stemming from resource use.

The Bank's initiative to issue recycled PVC cards in order to reduce its operations environmental impact, reducing plastic waste and promoting the circular economy, concretize in an entity - specific target related to plastic waste prevention and plastic waste recycling, set for 2024: 90% recycled PVC in the total amount of PVC used for newly issued cards. For 2025 the target is to increase the percentage to 99%. The target is voluntary set and is not derived from legal requirement applicable to the Group.

Cards Squad, IT, Logistics and Facility Management, ESG & Sustainability Directorate and Sustainability Steering Committee, are involved in defining, the environmental targets related to own operations as well as evaluating the degree of target attainment.

### **E5-4: Resource inflows**

#### **Value chain**

The impact of the Bank's loan portfolio has on resource use and circularity are analysed using the UNEP FI impact analysis tool and are driven by real estate activities, construction activity, and transportation infrastructure. These three sectors impact on resource intensity, which is linked to both resource inflows and outflows in the ESRS standard.

See also chapter [Strategy, business model and value chain](#)

#### **Own operations**

For its specific banking, financing and investment activity, the Group mainly requires office supply and IT equipment as physical resources. To conduct banking business, the most important additional resource is energy, which is discussed in E1-5. The goods and services that the Group purchases annually are disclosed in Scope 3 of the Group's CO<sub>2</sub> emissions in chapter [E1-6: Gross GHG emissions of categories Scope 1, 2, and 3 as well as total GHG emissions](#), including cloud services. In addition, the impact of emissions on waste management is also disclosed in Scope 3. To increase accuracy, the Group records all material goods that are purchased per quarter individually.

With an average of more than 1 million cards issued annually, also PVC is relevant for the Bank's resources inflows, the Bank considering switching gradually from standard PVC to recycled PVC in new cards production since 2022 and in a further future also to virtual cards, to reduce the environmental impact of own operations. In calculating standard PVC and recycled PVC quantities for newly issued cards, the Bank is relying on the number of annually issued cards for each cards category and each cards category technical specification, according to data and information received from the cards provider.

Further information can be found in chapter: [Climate change](#).

## **E5-5: Resource outflows**

### **Value chain**

See chapter [E5-4: Resource inflows](#).

## Social Information

### Own Workforce

The own workforce includes employees (referred to as employees in the ESRS)

PCO = People, Culture & Organisation

### ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model

#### Positive and negative impacts (own operations)

The importance of the own workforce for own operations is evident in the fact that the Strategic Roadmap for 2024 and 2025 includes People and Culture as a distinct point besides Sustained Growth, Customer Centricity, Efficiency and Speed and Adaptability. The Group has the objective to be an attractive employer and have a high-performing culture. The pillar of People and Culture contains the strategic initiatives to develop the Group directors and managers in becoming involved and effective leaders, to strengthen a collaborative and customer centric culture, to provide sustainable and fair reward and recognition, to be an authentic and distinctive employer and to provide meaningful career opportunities and growth.

The Group is aware that employees are its greatest asset. Continued success can only be achieved with satisfied, motivated, and healthy employees. Since working in banks is subject to high regulatory requirements and requires highly qualified employees, attention must be focused on well-qualified and well-trained staff who can successfully complete their assigned tasks. As a learning organization, the Group is aware that continuous development is necessary to maintain high standards.

#### Working conditions

##### Employee relationships

Regarding the working conditions, the Group is aware that they are of utmost importance for high employee satisfaction. Insecure or temporary jobs may lead to insecurity for those who are affected and prevent secure life planning, while secure employment offers financial stability and results in higher employee satisfaction. The Group offers the same benefits for all employees, also for part-time or temporary ones. The nature of the employment relationship can also have a significant impact on an individual's health, influencing factors such as stress levels and work-life balance.

In order to establish the specific rights and obligations of the employees, hiring a person is done through the conclusion of an Individual Employment Contract with the Bank. The Individual Employment Contract is concluded after a preliminary assessment of the professional and personal skills of the person applying for the job. In addition to the essential clauses, the Individual Employment Contract may also include specific clauses such as:

- mobility clauses;
- clauses regarding professional ethics;
- clauses concerning professional training;
- confidentiality clauses;
- performance objective clause

The Individual Employment Contract can be modified regarding the duration of the contract, the place of work, the type of work, working conditions, salary, working hours, and rest periods only with the agreement of the parties, by concluding an addendum to the contract within the time frame provided by law.

For some people it might be an advantage not to be in a permanent employment, this being determined by their personal needs. Although most of the employees have an employment contract with Group, either full time or part-time contracts, for the replacement of employees whose contracts are suspended, in parental leave or for limited time projects, there are employees who work for the Group with temporary contracts. The Group takes measures to ensure that temporary employees are equally involved in the processes and events happening within the organization, just like any other employee.

In addition to the permanent employees, there are also people who are not in an employment relationship with the Group but who perform work for the Group (different types of contractors). In such cases, the work instructions or the control and evaluation of the work resources and methods used are the Group's responsibility. A distinction is made between those persons who work

under a service contract between the Group and another company to provide the work defined in the service contract, and those individuals who have concluded a contract with a temporary employment agency. In the second case, the Group is responsible for defining and structuring the remit.

During the year, the Bank concludes a number of temporary employment contracts with trainees. The traineeship can last one year. The trainees undertake supportive and administrative tasks without any independent responsibility. Traineeships can be undertaken by university students or persons willing to make a career change at any point in time. In 2024, the Bank organized management trainee programs within IT area, Compliance, Data science, Risk, CRM and Retail Network. Following the completion of the program, selected participants are employed on the vacancies available in these areas. The Bank also offers the opportunity to conclude internship contracts. Such internships are limited to a maximum period of six weeks with the option to extend. An individual who takes up an internship must be enrolled in a college or University. Interns also carry out supportive and administrative work without any independent areas of responsibility. Many trainees and interns work 40 hours a week, but it can also be customized in reduced working hours.

The Group fulfills all legal requirements regarding working time and is aware of the advantage of flexible and fair working time. The Group is aware that overtime can result in a reduction in life-quality and mental and physical health, the overtime is monitored and strict compliance to the overtime hours allowed in a month is implemented. Most of the overtime is due to employees that are located in shopping malls and have an extended working program. The Bank has implemented part-time working conditions, mostly for mothers after maternity leave, until the child is 2 years old.

Also, flexible working hours increase employee satisfaction and have positive effects on the health of employees. Flexible working hours are under local management administration and help individuals to better tailor their free time to their personal needs. There are no differences between full-time and part-time employees in the Bank. The positive impact translates into a good work-life balance, while flexible working hours increase employee satisfaction, and has positive effects on health.

A special chapter (chapter III) from the Bank's Collective Bargaining Contract describes the "Working conditions in the Bank" extensively defining: working and flexible time, time for breaks and lunch breaks (relaxing time), payment of extra-hours, holiday entitlements or extra days offered by the Bank in case of special situations (with rights for the employees established higher than the minimum stipulated by the law).

## **Health**

The physical and mental health of our employees is important for the Bank. It becomes even more relevant in times of change (mainly due to technological progress or changes in the legal framework and regulatory requirements and associated restructuring). Persistent stress, fatigue and burnout can lead to both physical ailments like back pain and mental health issues like anxiety, ultimately hindering career opportunities. Constant sitting in the office can lead to chronic back and neck pain, increased risk of obesity and cardiovascular issues, poor circulation, reduced muscle strength, and mental health concerns, ultimately decreasing overall productivity.

The Bank takes all the necessary measures to ensure the safety and health protection of employees, prevent occupational risks, inform and train employees, and provide the organizational framework and necessary means for workplace safety and health.

## **Adequate wages and benefits granted to the employees**

The Bank adheres to a policy on fair pay principles, ensuring that remuneration is in line with employees' tasks and responsibilities. The potential negative impacts of inadequate wages include financial hardship for employees, which can lead to decreased motivation and diminished job satisfaction. Conversely, financial stability fosters higher employee satisfaction and security. A higher compensation offers a higher standard of living, more independence, and more opportunities to take care of one's own relaxation and health.

In setting and granting salaries, any discrimination based on gender, sexual orientation, genetic characteristics, age, national affiliation, race, color, ethnicity, religion, political opinion, social origin, disability, family situation or responsibility, or union membership or activity is prohibited.

To establish and ensure that salaries are at the market level, the Bank participating to yearly salary surveys. Furthermore, information regarding the salary budget evolution along with the current spending and calendar of various initiatives execution, are presented yearly to the Labor Union.

The minimum base salary in the Bank is significantly higher (49%) than the minimum base salary in Romania.

The Bank offers a various set of benefits that are in line with the market practice and among which, the most appreciated by our employees are: lunch tickets, pension contributions, accident insurance, 13<sup>th</sup> salary, etc. The bank allocates as well non-taxable amounts,

within the limits provided by law, for the minor children of employees for Easter, June 1st (Children's Day), and Christmas, as well as for employees on the occasion of March 8th.

In case of age limit retirement, early retirement, or retirement due to first- and second-degree disability, employees are granted a compensation representing a number of their own gross salaries.

### **Employees Participation**

Employee's participation in company matters is of great importance for the Bank as well as for the employees. Capturing the mood among employees and their needs offers an opportunity to address these, reveal possible problems and take measures to improve employee satisfaction. For employees, it means having a voice, being heard, and thereby enhancing employee engagement and loyalty.

The Bank employs a unified participation approach for all employees which happens through multiple channels, including partnership with the labour union and representation in the European Works Council at Raiffeisen Bank International level.

Rather than developing separate processes for predefined categories, the Bank uses a standardized engagement approach that allows for case-by-case adaptations based on individual feedback and circumstances. Through these established participation channels, employees have a voice in expressing their opinions and needs, enhancing both engagement and loyalty while ensuring appropriate support for all workforce members.

### **Equal treatment and opportunities for all**

#### **Diversity, equity and inclusion**

The Group is dedicated to reducing societal inequality through strong diversity management, focusing particularly on women, persons with disabilities, and employees that are 45+. The Group understands that its commitment to diversity not only fulfils a crucial societal function but also sets us as a role model. The Group acknowledges that diversity enriches perspectives, positively influencing business decisions, client service and company outcomes. By creating an inclusive working environment everyone can be themselves. Diversity can positively impact individual employees by fostering a sense of inclusion and belonging, enhancing job satisfaction, and providing opportunities for personal growth. It can also expose employees to different perspectives, improving cultural competence and broadening their worldview.

To leverage the opportunities offered by diversity and inclusion, it is necessary to adapt to different communication styles and cultural norms. Diversity management can also have a positive or negative impact on health. Poorly managed diversity can cause exclusion, discrimination, and lower motivation, harming job satisfaction and well-being.

#### **Employee development**

Comprehensive learning opportunities foster professional and personal development. By offering clear pathways for growth and development, including a performance review, the Group positively impacts employee satisfaction and motivation.

#### **Other work-related rights**

Information security and data privacy for individuals mean preserving their autonomy, dignity, and freedom, in line with legal norms. It enables them to control their personal information, maintain trust in their relationships, and exercise their right to self-determination without fear of surveillance or exploitation. Protecting the privacy of employee data reflects the Group's commitment to ethical principles, respect for individual rights and the promotion of a culture of trust and integrity.

## Financial risks and opportunities (own operations)

### Financial risks

There are currently no short-term material financial effects of sustainability matters related to our own workforce included in the IFRS financial statements. However, in the medium to long-term (5+ years) sustainability matters could potentially result in financial risk due to sustainability issues related to workers' rights in general and equal pay, discrimination, and the adequacy of whistleblowing procedures specifically. Failure by the bank to respect workers' rights could lead to operational disruptions e.g. strikes, work stoppages, or other disruptions that can affect business operations. In addition, fines and sanctions may be incurred under the legislative framework, as well as costs arising from legal actions and payments related to labour market legislation.

Specific area of financial risk is summarized below:

**Training and Skills Development** – The Bank recognizes the importance of continuous learning and development. The Bank is aware that when know-how and competencies fall behind market evolution, the Bank could face multiple challenges: innovation is hampered by lack of up-to-date expertise, significant costs arise from external acquisition of missing competencies, and bridging the knowledge gap becomes increasingly expensive. This vicious cycle can affect both operational performance and the bank's ability to remain competitive in an ever-evolving banking landscape.

### Financial opportunities

- **Diversity** is considered a success factor. Diverse teams work more effectively and make sounder, innovative and more creative business decisions. Given that the work undertaken in banks is subject to high regulatory requirements for which highly qualified employees are needed, the emphasis must be placed on well-qualified and well-trained employees who can successfully accomplish the tasks assigned to them.
- **Gender equality and equal pay for work of equal value** has evolved from a compliance requirement to a key competitive differentiator. By providing fair pay for equivalent work, the bank upholds its ethical responsibilities while also establishing itself as a desirable employer. This practice helps to attract and retain high-performing individuals, regardless of gender or other factors.
- **Employment and inclusion of persons with disabilities.** The inclusion of persons with disabilities represents a strategic opportunity that extends far beyond corporate social responsibility. By creating an accessible and inclusive workplace, the bank taps into a valuable talent pool while fostering a culture of empathy and innovation. These employees bring unique perspectives and problem-solving abilities, while also opening doors to new market segments. The allies of persons with disability (networks of family, friends, and community members) often become loyal customers, creating a multiplier effect that enhances both business growth and brand reputation.

The Group's material opportunities arising from impacts and dependencies on people in its own workforce include initiatives targeting specific groups of employees. The opportunity for equal treatment through gender equality and equal pay for work of equal value specifically addresses women in the workforce, aiming to create fair advancement and compensation practices.

Similarly, the opportunity for employment and inclusion of persons with disabilities directly targets this specific group of employees, focusing on creating an accessible and inclusive workplace environment. While the bank also identifies diversity as an opportunity area, this represents a broader organizational concept rather than relating to a specific group of people in the workforce, and therefore falls outside the scope of opportunities targeting specific employee groups.

The identified risk – related to training and skills development- is a general workforce risk rather than risk relating to specific groups of people in Group's workforce.

## S1-1: Policies related to own workforce

In the following paragraphs are presented policies which are related to the topic own workforce. All policies are published only internally. Further information on monitoring of the policies and how the Group policies are made available to key stakeholder groups can be found in chapter Policy frameworks as governance instruments.

### Group Code of Conduct

The most important Group framework is the Group's Code of Conduct (see chapter [G1-1: Corporate Culture](#)).

The Code of Conduct describes Group's culture for equal treatment and opportunities for all employees. It focuses on areas like fair employment practices, no discrimination or harassment and no violence and mentions the importance of laws, regulations and rules of the country in line with international standards in relation to human rights (e.g., Fundamental Principles of the

International Labor Organization), freedom of association, equal employment opportunities as well as prohibition of forced, compulsory or child labor etc.

The Code of Conduct states that any form of discrimination (for example, on account of age, ethnicity, religion or belief, gender, sexual orientation, or disability, political or other opinion, any form of harassment, is inconsistent with maintaining an integrating work environment in which staff members can reach their highest levels of individual productivity and Group's business goals. All employees are encouraged to report cases of discrimination (see: [Management of internal violations](#) and [Whistleblowing management](#))

The Code of Conduct states that Group encourages the staff members to act proactive and constructively address changes that may impact their work and anticipate these changes whenever possible. Any member of Group's staff is encouraged to express individual professional opinion or judgement on matters within their respective responsibility. The Group Code of Conduct mentions also that Group is enabling channels for the exchange on relevant topics between the staff and the Board of Management.

Regarding work-life balance, the Code of Conduct states that Group strives to be a company that enables its employees to have a good balance between working hours and private life and ensures that any potential negative impact that an unhealthy work-life balance could cause is minimized. The Group's Code of Conduct considers respect for the human rights of the people in its own workforce and promotes equal opportunities.

Additionally, the Group's Code of Conduct mentions enabling channels for exchange on relevant topics, between staff and the Management Board. The monitoring of the Group's Code of Conduct is mentioned in chapter [G1-1: Corporate culture](#).

## **Human rights**

In 2022, Raiffeisen Bank International developed a Human Rights Policy, which is planned to be implemented at the Group level by 2026.

A wide range of Human Rights provisions are already part of Bank internal corporate regulatory frameworks (see below [Bank Diversity Policy](#)).

The Bank commits to uphold its employees 'Human Rights standards" (see also [Group Code of Conduct](#), [Bank Diversity Policy](#) and [Bank Policy on discrimination and harassment](#)). The principle of non-discrimination, labour law standards, collective bargaining agreements and social dialogue are being respected, fulfilled, and promoted.

The acceptance of differences about ethnicity, religion or belief, gender, sexual orientation, or disability, political, other opinion and any other criteria are central to the creation of an inclusive business culture that aims at the reduction of barriers and inequalities in the career path as well as the implementation of equal pay.

Alongside these factors, a safe and healthy working environment, adequate remuneration as well as the right to freedom of association and the effective recognition of the right to collective bargaining also play a vital role in upholding employees' Human Rights. Protection of employees' interests envisage, at a minimum, that there are channels for the exchange on relevant topics between employees and the board. People, Culture and Organization as process owner shall ensure and facilitate compliance with the above requirements.

The Bank commits to uphold fundamental human rights for its own employees and explicitly prohibits any form of trafficking in human beings, forced labour, compulsory labour, and child labour as outlined in Section 2.3.1 of the Code of Conduct.

## **Topic specific policies**

### **Working conditions**

#### **Working time**

Working time provisions are covered into the Collective Bargaining Agreement, which is under the responsibility of the Group's People, Culture & Organization department. This contract applies to all employees, regardless of their union status, and includes comprehensive regulations according to national legislation: flexible schedule, overtime, rest periods and ways of recording the time worked.

#### **Company agreements**

The company agreements are reviewed regularly (normally once a year) to ensure they remain relevant to current circumstances and to comply with any legal changes. The company agreement on social benefits for the head office regulates social benefits for employees such as the group health insurance subsidy, staff restaurant subsidy, conditions for discounted banking terms, salary increases, payment during parental leave, extended termination protection during parental leave etc. The company agreement is under the responsibility of the Group's People, Culture & Organization department.

### **Social dialogue**

Social dialogue provisions are part of the Code of conduct. Any member of the Bank's staff is encouraged to express opinions within their respective responsibility.

The Code of Conduct mentions also, that the Group is enabling channels for the exchange on relevant topics between the staff and the Board of Management. All employees are represented by Labor Union and collective contract agreement and addendums are part of the internal regulations, along with all policies, norms, and procedures. The agreement is renegotiated every two years and employees are informed by –mail regarding the stipulations, in addition it is published on the local Intranet. The Labor Code and Social Dialogue Law (367/2022) are the main legal requirements that regulate social dialogue.

### **Freedom of association**

The Group upholds freedom of association principles in accordance with the applicable legal regulations in force.

### **Collective bargaining**

The Group upholds collective bargaining principles in accordance with the applicable legal regulations in force. The Labor Code and Social Dialogue Law (367/2022) are the main legal requirements that regulate collective bargaining.

### **Work-Life Balance**

Work-life balance provisions are integrated within the Group's Code of Conduct and the collective bargaining agreement.

The contract details benefits that improve work-life balance, such as hybrid working, one annual day off for special events (including family events) or two days off per year for the employee's birthday. The Group actively promotes a healthy work-life balance, encouraging flexibility between working hours and leisure time and developing new ways of working and implementing measures to remove any potential barriers. Also, social values and normative models are evaluated to create an inclusive work environment, equally beneficial to all employees, regardless of gender or other differentiation criteria.

### **Health and safety**

According to Labor Code and Law 319/2006, the Group has legal regulations for dealing with problems related to occupational diseases. These laws show that the employer has the responsibility to prevent occupational diseases, and the employee must comply with the safety measures imposed by the employer.

The Group complies with the legal requirements on health and safety. The most important ones are described below:

- Training employees with the forms related to the type of training for each employee;
- Identifying and assessing the risks of accidents at work and occupational diseases;
- Registration of accidents at work and / or occupational diseases;
- Collaboration / investigation and registration of accidents at work at the Territorial Labor Inspectorates and at the Labor Inspectorate;
- Ensuring documents of compliance with maternity protection legislation and rules;
- Programming and ensuring regular medical examinations made available to the employee;
- Collaboration / elaboration of rules, norms and procedures, regulations and instructions in the field of safety and health at work;
- Organization of first aid courses.

All employees have access to the rules and procedures regarding Health and Safety at Work, which include:

- The standards regarding work accidents;
- The procedure regarding employee training and electronic signing of H&S documents;
- The procedure regarding maternity protection in the workplace

The Bank has established a Workplace Health and Safety Committee with representatives from employees and employers to comply with legally mandated occupational safety and health standards. The resulting measures apply to all Bank's employees.

Bank's Occupational Health and Safety Management System is implemented through conformity assessment, involving management and employee consultation, strategies, plans, and procedures. The OH&S management has been implemented in accordance with the Health and Safety Law No. 319/2006 and the Methodological Norms for the implementation of legal provisions by Government Decision No. 1425/2006. The OHS management system covers all categories of workers, including contractors, visitors, service providers, or employees of a third party assigned to operate in the premises the bank manages. The

Bank strives to ensure that all visitors, contractors, and workers from outside the organization who carry out activities under a service contract are trained in accordance with the legislation in force, including: the unit-specific activities, occupational safety risks, prevention and protection measures and general bank level activities. The bank has also an Internal Health and Safety Service and a digital OH&S platform for employee training, which optimizes their time and is easily accessible from any location.

The Bank ensures communication to the Directorate of Public Health and Labor Inspectorate of any events that may affect health and safety at work, including accidents at work and cases of occupational diseases.

The Bank is obliged to register any fatal work accident and report this to the official authorities within a certain time period. This obligation is governed by specific legislation in the field, and it is the responsibility of the legal employer to ensure that these obligations are fulfilled. The internal recording of these events is also necessary to assess risks and prevent similar accidents in the future. Reporting the number of workers who have died because of accidents at work on the territory or premises of the organization during the performance of specific work activities, it is made for both employees and non-employees, according to the legislative provisions (Law 319/2006). These deaths are considered the consequences of occupational injuries caused by negligence or non-compliance with occupational safety and health rules.

## **Equal treatment and opportunities for all**

### **Recruitment**

The recruitment and selection policy of the Bank aims to identify and attract competent candidates who are compatible with the bank's values to meet the workforce needs. Key principles include conducting ethical processes, prioritizing long-term hiring decisions, and providing opportunities for both internal and external candidates. (MDR-P 65c).

Vacancies are first published internally and then externally, with the recruitment and selection process being the responsibility of the Recruitment Department. Positions open for internal recruitment are posted on the Internal Community for all employees interested in applying. Internal recruitment does not preclude the possibility of external recruitment, but in the event of equal merit between internal and external candidates, preference will be given to the internal candidate. All job openings and job descriptions are formulated taking into consideration an inclusive, gender-neutral language, to avoid gender bias and encourage a more diverse pool of candidates to apply for open positions. Vacancies are published on the most appropriate channels, internally or externally, depending on the portfolio of skills sought; there are cases when the skills do not exist in the Bank and the vacancies are published only on the external job market.

### **Diversity policy**

The Bank has instituted a local Diversity Policy overseen by People, Culture & Organization Directorate. This policy applies to all employees within the Bank. It is based on European directives and regulations, as well as on all applicable local standards. This regulatory framework is regularly updated to ensure adherence to all current regulations.

The policy outlines attitudes, roles and responsibilities related to diversity and sets forth principles for implementing a diversity and inclusion strategy across the bank.

Key elements of this policy include the Bank Diversity Vision and Mission, as well as providing a framework for diversity management. The policy emphasizes that for the Bank, diversity means added value. Levering the opportunities provided by diversity offers sustainable benefits for our company and employees as well as the economy and society.

As a strong partner, the Bank harnesses the potential of diversity actively and professionally in order to best support its clients and to strengthen the company position as an attractive employer. This policy will be regularly reviewed and amended or adapted if required to comply with legal and regulatory provisions as well as internal governance adjustments.

### **Employment and inclusion of persons with disabilities**

The Bank's Diversity Policy states the Bank's Diversity Guiding Principles, which include the valuation and respect for each other, regardless of physical impairment or other characteristics. The aim is to maximize diversity in teams. To foster a safe and healthy work environment for all, the organization has connected with NGOs that specialize in disability advocacy.

### **Anti-Discrimination and Anti-Harassment policy**

Both the Group Code of Conduct and the Bank Anti-Discrimination and Anti-Harassment policy have a clear statement against violence and harassment in the workplace. Additional measures have been implemented, including a dedicated guide, mandatory training to all employees on discrimination and harassment, mechanism to signal any incident or violation, internal resolution mechanism and internal dedicated support persons, certified experts in equal chances. The discrimination and harassment policy has been updated in 2024 and includes clear and strong commitments against any form of discrimination and harassment.

As an employer, the Bank has undertaken the obligation to include in its internal regulations, procedures and policies explicit provisions on the prohibition of discrimination and harassment of any kind and to inform employees about these provisions.

### **Total rewards management policy**

The Bank has implemented Total Rewards Management Policy. The responsibility of the policy is with People, Culture & Organization and was first published in 2020 and since then it is revisited each year.

The scope of the policy covers own operations regarding remuneration principles, is applicable for all Bank's employees and is of importance for PCO, Legal, Compliance and Integrated Risk Management Departments.

The policy provides general and special remuneration principles applicable to the Bank, including rules and regulations to align market adequate compensation and fringe benefits.

The policy aims to foster the development, satisfaction, and loyalty of Bank's employees by providing financial stability and by focusing performance management on the development of our staff members. The proportion of variable compensation to fixed compensation is well balanced providing for every employee an adequate living based on fixed income; thus, allowing a full flexible variable remuneration policy including the possibility of no variable remuneration while offering financial security to the employees.

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The policy is regularly reviewed and needs approval by the Board of Management of the Bank. The Policy is based on European directives and regulations, as well as on all applicable local standards. This regulatory framework is regularly updated to ensure adherence to all current regulations.

The provisions of the Raiffeisen Bank International have been fully incorporated into the Bank's Remuneration Policy, adhering to the same core principles. This ensures alignment maintaining a consistent balance between fixed and variable compensation, while also upholding market-adequate practices and fostering employee satisfaction and loyalty. The Bank's policy shows the commitment to financial security and flexibility, offering a structured yet adaptable framework for remuneration that supports both employee development and organizational goals. The policy is reviewed regularly, but at least annually, and adjusted as necessary to reflect changed circumstances.

### **Training and skills development**

The Bank has implemented a local Learning, Development and Talent Management Policy, the responsibility for the policy is with People, Culture & Organization Tribe/ Learning & Development Chapter.

The scope of the policy covers all own operations related employees within the Bank. The policy defines the key rules for Learning, Development and Talent Management and serves as the framework for all learning and development initiatives, including local regulations.

The Bank must support each manager and employee in getting and constantly upgrading the necessary skills and know-how to perform well in his current job, to deliver optimum results, to reduce business risk and to get ready for a possible future job within the organization.

It is Bank's obligation to ensure a consistent high quality of staff qualification. In addition to the local responsibility of RBRO, the following governance rules apply: Executive Development is the responsibility of the Learning & Development Chapter within the People, Culture and Organization Tribe, who provides Board Members and Board Potentials and Leaders of Organizations (Board Members and second tier of management who have full management responsibilities and make decisions for the whole organization or a business unit) with suitable learning and development offers for mandatory and/or voluntary participation.

Professional or leadership development programs and initiatives, which are requested, initiated and approved by a Bank's Board Member and rolled out by the respective Bank's business area in cooperation with People, Culture and Organization representative, have to be executed locally.

The local policy on learning and development is aligned with the regulations of Raiffeisen Bank International. The policy states that each subsidiary has to have a functional training architecture, a common leadership training architecture and needs to ensure that education needs derived from regulatory requirements are covered appropriately. Additionally, the policy stipulates that each subsidiary must provide appropriate career development for its staff, and that every employee must participate in at least one annual development dialogue with their superior. The guiding principles of performance management are based on corporate values and the Code of Conduct. The policy is reviewed regularly and adjusted as necessary to reflect changed circumstances.

### **Performance Management Policy**

The Bank implemented in 2022 the Performance Management Policy, which is in the responsibility of the Bank's People, Culture & Organization Directorate. Performance Management as a process aims to enable all employees to perform at their best and to grow to their full potential ensuring the future success of the company. It also ensures that all employees are clear about their expected contribution and those are aligned with the overall objectives of the organization.

The performance Management provides a framework for joint growth of employees and managers and a basis for their, and the Bank's, positive future development. The guiding principles and the process described in this Internal Regulation apply to all employees. At the same time, it is understood that for selected functions (e.g. drivers), performance-related day-to-day management may be sufficient and that some formal aspects (goal setting, documentation, feedback tools) should be kept as simple and light as possible or may not apply at all. The decision about these exceptions belongs to the Management Board of the Bank. The policy is reviewed regularly and adjusted as necessary to reflect changed circumstance.

### **Management of internal violations**

The group guideline "Management of Internal Violations – Principles and Guidelines" was implemented by Group Compliance, offering clear principles for the management of internal violations. The policy will be implemented also at local level. Measures to provide and/or enable remedy for human rights impacts can be found in the chapter G1-1 [Whistleblowing](#).

The guideline objectives include:

- Clarifying the scope of internal violations management and outlining common definitions and responsibilities across the organization.
- Establishing a transparent process for handling internal violations to ensure consistent treatment within the organization
- Communication of Group's principles on managing internal violations.

The line manager together with the relevant internal policy owner, i.e. HR function, is responsible for ensuring that violations against the Code of Conduct or employee duties are reported to the local compliance violations cockpit, including assessment of the severity of the violations and taking risk-based actions. Violations concern work-related incidents according to the internal classification of violation types, which according to the Code of Conduct are discrimination, harassment or violence, or endangering occupational health and safety.

The person in charge of the complaints area frequently monitors the deviations. Incidents or violations concerning situations of discrimination or harassment are investigated under confidential conditions, at the level of the PCO directorate, by certified internal experts in equal opportunities or by a dedicated commission, according to national legislation. Involving employees in reporting misconduct helps to increase the level of dedication and loyalty, giving them a voice and ensuring that they are heard. Failure to respond to the needs expressed by employees and lack of attention to their mood can lead to issues that remain unresolved, negatively impacting employee satisfaction.

### **Whistleblowing management**

The Group has established policies and guidelines describing the procedures to follow in the event of incidents, complaints, or human rights impacts. The Bank Whistleblowing notification channel management policy and working procedure regarding the anti-corruption and anti-bribery activity (ABC) outlines a clear framework for whistleblowing, ensuring consistent standards across the organization.

#### **Reporting**

The Bank offers two channels to file complaints:

- People, Culture & Organization Directorate. Employees are responsible for raising concerns and complaints to PCO Directorate, at dedicated mail address
- Whistleblowing. The Group's employees, as well as persons whose employment relationship with it has not yet started (e.g. candidates for Group open positions); Contractors, consultants, suppliers service providers, business partners (referred to generically as "business partners") of the Group have the responsibility to report potential breaches of the Code of Conduct or regulatory requirements via Whispli, an anonymous reporting platform available across the Group.

The Whistleblowing Management Function (WMF), situated within the local Compliance Department, investigates reported breaches, including but not limited to:

- Harassment at work, mobbing, discrimination; - in this type of complaints, Compliance department redirects to PCO Directorate the incident/violation details, for further investigation and resolution
- Failure to protect personal data.
- Bribery and corruption;
- Suspected money laundering and violations of financial sanctions regimes;
- Fraud and theft;
- Conflicts of interest;
- Breaches of the legal regime for the provision of financial investment services or suspected market abuse
- Other breaches of the Code of Conduct.

The number of discrimination and harassment incidents and violations will be reported by PCO Directorate in Compliance Cockpit.

Incidents resulting in fines, penalties, or compensation for damages due to human rights impacts (e.g., forced labor, human trafficking, or child labor) are reported in the central operational risk management system. This reporting is in accordance with the Bank Operational Risk Management Policy.

## Other work related rights

### Human resources general data protection regulation policy

The Group implemented an internal human resources general data protection policy which is relevant for all employees. The policy was implemented in 2018. The policy ensures that the following principles are fulfilled by employees working in Group People, Culture and Organization: lawfulness, fairness and transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality. The policy is intended to ensure that there are no data breaches and that all employees handle employee data responsibly. It also contains regulations regarding providing of information and DSR, and how to handle data breaches. The policy is reviewed regularly, and adjusted as necessary to reflect changed circumstances

## S1-2: Processes for engaging with own workforce and workers' representatives about impacts

Employee participation is of great importance for the Group, as well as for the employees. Capturing the state of mind and spirit among employees and their needs offers an opportunity to address these, reveal possible problems and take measures to improve employee satisfaction. For employees, it means having a voice, being heard, and thereby enhancing employee engagement and loyalty. At Group level, there are several options to ensure employee participation.

The Group seeks to ensure trust-based cooperation with the employee representatives as a key element of its corporate culture, which is founded on cooperation at all levels and is intended to shape the relationship between all partners, both internally and externally. The Group acts in accordance with the relevant statutory regulations and the agreements concluded and take into account the respective operating conditions. The most senior responsible person for employee participation: the PCO Director, who has delegated competences to negotiate and sign, as a president of the negotiating committee.

There are no representatives for persons with disabilities.

When it comes to training regarding employee participation, every year, colleagues who are enrolled in the trade union attend meetings on various topics with guests from the local labor market.

### All Staff Meeting

Different communication platforms within the Bank include effective formats for interaction such as the quarterly All Staff Meetings. These one-hour calls start with a report by the Board Members on the current situation before giving employees the opportunity to ask questions. These questions are then answered live by the Board Members. The bank uses Microsoft Teams live events for this platform so that all employees can participate.

## Employee surveys

In order to better understand and fulfill the needs and expectations of employees, the Bank aims to be a good listener. The Bank achieves this through the following employee surveys.

### Employee Opinion Surveys (EOS)

In 2024, the Bank conducted 4 quarterly Employee Opinion Surveys (EOS) on engagement and enablement. With this study, the Bank understands the factors that influence the two important pillars of our organization, namely engagement and enablement, and measure the perception and the understanding and alignment of our people towards our strategic initiatives.

	31.12.2024
Pride "I am proud to work for this company"	90 %
Care "The bank demonstrates care and concern for its employees"	79 %
eNPS "I would recommend this Bank to my family or friends as a place to work"	84 %
Engagement	87 %
Enablement	91 %

### The Bank's labour union

The Bank's labor union represents all employees and is involved in the collective agreement negotiation and in frequent meetings with the representatives of the company whenever necessary; all employees are informed on the results of the meetings, agreed by the two parties, the communications are made via e-mail. The new collective agreement contract concluded for 2024-2026 has been implemented, where the initial clauses of collective agreement contract have been maintained and favourable updates for employees have been included (monetary and non-monetary benefits).

### European Works Council Agreement

The Bank is also aligned with the group, which has been involved in the process of European Works Council agreement.

All meetings as EWC members of Bank's representatives are organized at Raiffeisen Bank International level. The Bank has two representatives in European Works Council. Two meetings were held in 2024 in extended meeting (all members) and other two meetings were held by the leading committee. The result of the meeting consists in discussions on topics regarding Bank's evolution - results, new policies, reorganizations, impact of social and political context, etc. The Bank was the host of one of EWC meetings in 2024. There is no information to the Bank's employees about the results/discussions of the EWC. Local law doesn't specifically request representatives of works council in Supervisory Board.

In the Bank harassment, discrimination, and equal chances topics are included in the Guide for non-discrimination and non-harassment in the workplace, that is addendum to Collective Contract Agreement.

### Occupational Health and Safety Committee (OHSC)

The Bank's Occupational Health and Safety Committee (OHSC) consists of employer or his legal representative, 8 representatives of the employer with occupational safety and health responsibilities, 8 workers' representatives with specific responsibilities in the field of worker safety and health, occupational medicine doctor.

The committee meets quarterly and whenever necessary. The designated employees, representatives of the Internal Prevention and Protection Service and their representatives, labor inspectors, and the occupational physician are called to attend the meetings of the OHSC.

### Artificial Intelligence for Human Resources

In 2024 a tool designed with Artificial Intelligence was developed for Human Resources topics for all employees to have instant answers to the HR procedures, Collective Bargain Agreement items, policies.

### S1-3: Processes to remediate negative impacts and channels for own workforce to raise concerns

All the Group employees are encouraged to report any suspicions of compliance violations, or ethics violations such as bribery and corruption, suspected money laundering and financial sanctions violations, fraud and theft, conflicts of interest, and other violations of the Code of Conduct. Thus, they are provided with a channel to submit complaints safely, without repercussions, and in confidence: Whistleblowing platform - Whispli - managed at the Bank level

All the violations and incidents are monitored, documented, and reported. All the employees are trained on the subject.

Regarding any form of discrimination or harassment, a dedicated mechanism for complaints on incidents or violations is established, managed by internal Equal Chances Experts/Dedicated Committee.

### Processes for identifying, reporting, and addressing workplace safety concerns

The company has established comprehensive processes for identifying, reporting, and addressing workplace safety concerns.

Employees can report dangerous situations via a dedicated email address (protectia.muncii@raiffeisen.ro), and the company uses the INCDPM method to assess occupational injury and illness risks.

When faced with serious and imminent danger, employees are required to take immediate safety measures including stopping work equipment/activity, evacuating personnel from danger zones, and notifying specialized services and hierarchical leaders.

For work accidents, the employer ensures thorough investigation and reporting to the Territorial Labor Inspectorate through a structured process that includes event awareness documentation, research file preparation according to GD 1425/2006, verbal research processing, and accident registration using F.I.A.M. forms. The company maintains detailed records through various registers for different types of incidents, including work accidents, dangerous incidents, light accidents, and accidents resulting in more than three days of work incapacity.

All these processes form part of the overall OSH management strategy, focusing on intrinsic prevention, optimal protection measures, and comprehensive risk information.

The Bank supports the availability of channels in the workplace for its own workforce through several key processes. It ensures clear communication by regularly informing employees about the available channels for raising concerns via emails, and Intranet. Accessibility is prioritized by making reporting channels easily accessible. Training programs are provided to educate employees on how to use these channels and emphasize the importance of reporting concerns. Confidentiality is guaranteed to encourage employees to come forward. Additionally, dedicated support within PCO and Compliance departments are established to manage and address concerns raised by employees. These processes collectively ensure that employees have multiple, reliable avenues to voice their concerns and that these concerns are addressed promptly and effectively.

### 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

Topic	Material Topics related to Impacts, Risks and Opportunities				
	Diversity, Equity and Inclusion	Employee Development	Health	Employee Involvement	Employee Relationships
Diversity Officer - Formal Governance Structure	yes				
General diversity trainings	yes				
Generation Management	yes		yes		
Employment of people with disabilities	yes		yes		
Intercultural Management	yes				
Diversity - external memberships	Yes				
Dependent care programs	Yes		yes		
Semi-retirement programs					yes
Return to work programs			yes		
Teleworking					yes
Part-time-work (parents)					yes
Part-time-work (other than parents)					yes
Time off for father in event of a birth (beyond statutory requirement)					yes
Talent management	Yes	yes			
Trainee programs		yes			yes
Educational leaves		yes			
Transition assistance programmes		yes			
Programs for mental health		yes	yes		
Cooperations with Universities		yes			
Attractive employer recognition				yes	
Executive training on work-life balance		yes	yes		
Health management trainings		yes	yes		
Health checks			yes		

Topic	Material Topics related to Impacts, Risks and Opportunities				
	Diversity, Equity and Inclusion	Employee Development	Health	Employee Involvement	Employee Relationships
General health consulting			yes		
Access to non-occupational medical and health care services			yes		
Voluntary health services			yes		
Consulting on ergonomics			yes		
Burn-out prevention and support			yes		
Physical health programs			yes		
Bank robberies - psychological support			yes		
Other sabbaticals			yes		yes
Promotion of sport and wellness activities			yes		
Company canteen					yes
Promotion of private health insurance					yes
Promotion of pension fund					yes
Promotion of cultural events					yes
Special terms bank products					yes
Staff Only Meetings				yes	
Employee Survey				yes	

In terms of employees' sustainability, following the refreshed the Employee Value Proposition (the set of benefits and offers that the organization offers to its employees in exchange for their skills, experience, and work), the Bank ran the Employer Branding campaign. It also launched a wellness newsletter where it explains the benefits it is offering in the area of wellbeing, and it runs healthcare and stress prevention workshops.

The implemented measures are subject to detailed and precise planning in advance to ensure maximum effectiveness. Various tools are used to evaluate the effectiveness of individual measures. For example, employee surveys are conducted regularly to provide insights into how the measures and their effectiveness are perceived by employees. The survey assesses perceptions on aspects such as flexibility and work-life balance, collaboration, learning and development opportunities, and diversity.

Key areas such as work-life balance, employee engagement, employee development, fair compensation, and health fall within the responsibilities of People, Culture & Organisation Directorate and are addressed by its staff.

### Diversity, equity and inclusion

The Bank has implemented policies to emphasize the importance of collaborative behaviour among employees, with a particular emphasis on preventing discrimination based on gender, age, religion, sexuality, etc. The Bank recognizes the significance of promoting collaborative behaviour among its employees and preventing any form of discrimination based on gender, age, religion, sexuality, among others. To address both negative and positive impacts, it has implemented policies emphasizing the importance of these principles. All employees are informed about the contact details where they can make complaints to certified internal experts in equal opportunities (which falls under the responsibility of the People, Culture & Organisation Directorate) and have access to the Whispli platform (which falls under the responsibility of the Compliance Department). This platform enables employees to anonymously report cases of harassment, bullying or discrimination in the workplace, as well as other violations of the Code of Conduct. These measures are continuously implemented to ensure a safe and inclusive work environment for all measures are implemented continuously. The People, Culture and Organisation Directorate oversees matters related to diversity and inclusion within the company. To serve as a primary point of contact for these issues, the organization has appointed a diversity officer who holds the Inclusion Champion certification. Additionally, the diversity officer is certified as an Equal Chances Expert and on inclusive language. The diversity officer serves as a primary point of contact for these issues.

The People, Culture and Organisation Directorate oversees internal grievance mechanism for all employees in case of discrimination and harassment, along with a dedicated committee. The diversity officer maintains contact with the diversity officers from the Raiffeisen Bank International to review the implementation of diversity and inclusion policies, exchange ideas, and share best practices and insights. The Bank determines its internal structure for diversity and inclusion topics independently.

In 2023, the Bank established an internal working group comprising members from various areas. This move was aimed at supporting diversity and inclusion within the organization. One crucial step taken in this regard was the engagement of a Management Board member, who engages in dialogue and provides active support towards diversity and inclusion.

In 2023, the Bank launched an organization-wide diversity and inclusion survey with the Romanian Diversity Charter. In doing so, the Bank wanted to take the pulse of the employees regarding diversity and inclusion and to reflect on the valuable input received from those surveyed in diversity management. Three categories for action have been identified as priorities, targeting the needs of people with disabilities, women, and those aged 45 and above.

The Bank is a signatory of Romanian Diversity Charter, a member of the European Diversity Platform, and a founding corporate member of the Romanian Diversity Chamber of Commerce. A Bank Board member is also a Member of the Board of Directors of Romanian Diversity Chamber of Commerce.

Various diversity and inclusion related training courses are offered across company. At Bank level, all employees are included in a yearly mandatory training regarding discrimination and harassment, and a dedicated Guide, as addendum to collective labour contract, is implemented. It details all measures against any incident or violation, including dedicated mechanism and roles for investigation and resolution. The guide is available for all employees on Intranet.

Dedicated workshops for managers were organized, to provide more information and tools to prevent any form of discrimination and harassment.

In 2024, the Bank approached a comprehensive commitment to Diversity, Equity, and Inclusion through various initiatives. The company conducted extensive workshops and interviews covering topics such as, burnout, neurodiversity, harassment, discrimination, disability awareness, and intergenerational cooperation.

To ensure consistent communication, D&I news was prominently featured on the Intranet home page and dedicated news section, complemented by monthly newsletters distributed to all employees. The organization actively engaged with community members and D&I experts through interviews, while maintaining monitoring of key metrics including D&I-related questions in Employee Surveys.

Additional measures are described in the chapter Report Practices of remuneration and selection and elements of diversity.

To build a network for young employees, to understand their needs and to offer them a forum where they can meet, network and develop, the Bank ran a program for Management Associates in 2024, as of January 2024 34 persons were enrolled on positions, allocated in Head Office, as follows: Risk Architecture and Advanced Analytics, Financial Control, Data, Structured

Finance, IT Core, IT Delivery, Non Retail Credit Risk, Retail Risk, Compliance, SME, Audit. During Aug-Sept 2024 the Bank launched the program also for the Retail Network, for two groups, consisting of 33 persons enrolled on these positions.

When it comes to employing people with disabilities, the Bank has established collaborations with NGO's involved in offering support to persons with disabilities to stimulate the number of persons recruited for this category.

Global labor market trends show that flexibility is particularly desirable for many employees, which is why the Bank offers a hybrid working option as well as the possibility of working part-time. In 2024, the Bank continued the hybrid work schedule, adapted to the specificities of the workplace, with a minimum number of working days per week. The schedule consists of a minimum of 6 days per month in the office for non- managerial staff and minimum 12 days per month in the office for managerial staff and the rest of the days outside the office. The program is also perceived as a differentiator and helps the bank attract candidates and retain people in the company.

In addition, the Bank offers the possibility of educational leave.

The Bank also promotes Fun@Work initiatives, which bring teams closer to each other and help it build trusting relationships.

The Bank is aware that handling diversity impacts both employee well-being and, consequently, work performance. All the above-mentioned measures are intended not only to familiarize employees with diversity but also to integrate it into their daily work routine. The measures presented above demonstrate, also, the Bank's commitment to pursuing opportunities identified in the materiality assessment.

## **Employee development**

The continuous development of the employees is important for meeting legal and personal requirements.

Therefore, the Bank has designed a structured performance management system aimed at enabling employees to develop personally and professionally. Performance management as a process is geared towards permitting employees to perform at their best and grow to their full potential, thereby assuring the future success of the company. It also ensures that all employees are clear about their expected contribution and aligned with the overall targets of the organization.

All employees are encouraged and supported to continue their learning journey and shape their development, as further outlined in the following paragraphs. As a learning organization, the continuous development of its employees is an ongoing process.

Employee development strategy is supported by the allocation of yearly training and development budget for each business area and available option for coaching sessions for directors on performance related topics. Moreover, the Bank allows the employees to take up to four days per year dedicated to learning and developing new skills.

Development and learning take place continuously, combined with feedback and retrospective analyses as an integral part of day-to-day work. For its talents, the Bank creates a support system that encourages employees to actively lead their own professional development. We believe that the personal desire to learn is the key to evolution.

The Bank is proud of its employees and the skills they have built up and developed in the past. Giving each and every individual the opportunity for personal and professional development is a way of persuading more employees to remain with the Bank for the long term.

Managers are expected to conduct regular development discussions with their team members and document agreed-upon goals. To streamline the performance management process, the Bank has implemented Hive, a dedicated internal platform. The organization targets 100% platform adoption, with all objectives being defined, agreed upon, and reviewed between employees and their direct supervisors (N+1). The Bank has introduced Individual Development Plans (IDPs) as a structured tool for employees to plan and track their development objectives. These plans align with both short-term and long-term development goals and require approval and support from direct supervisors. All objectives and their progress can be tracked through the Hive platform.

Regular dialogue between employees and supervisors helps build trust and enables early identification and resolution of work-life balance concerns. The performance management system aims to enhance employee satisfaction, increase productivity, and improve organizational performance through continuous feedback.

In recent years, and more accelerated in 2022 - 2024, with the implementation of the new learning and development platform, the Bank has taken a series of actions aimed at reducing the potential for perceived disparities among employees in terms of learning, development, and career opportunities. Colleagues are informed through online workshops, every year, about the individual development plan, which serves as a tool actively supporting development, emphasizing employee ownership in this development journey. Employees receive support from their managers and from the People, Culture & Organisation Directorate,

upon request, in building this plan with the most appropriate actions. The development tools accessible to all employees include materials hosted on the Hive platform, webinars, and workshops with various specialists from the bank. Employees can enroll in all these activities directly from the learning platform.

The training plan is based on the identification of learning and development needs. Prioritization is done by the centralized analysis of training needs extracted from: the strategic directions of the organization, assessments arising from organizational studies, regular one-on-one discussions with line managers/regional management, performance management process, unforeseen requests received through formal or informal communication channels. Once all training needs have been centralized and prioritized, the training and development plan is prepared and the budget available to meet these needs is submitted to senior management for approval. In 2024, 4947 employees participated in at least one training course, including e-learning, with an average of 6.65 training days per employee.

In 2024, employee training was done both online, through webinars, and in-person, through classroom-based courses delivered by both external providers and the Bank's internal trainers.

In 2024, the Bank conducted development programs derived from the organization's strategy and aligned with the organizational culture. These aimed to strengthen both the functional and leadership skills of employees and increase their engagement. The programs implemented addressed all employees in the organization, both in the business segments and in the support areas, to increase the professional skills of the entire Bank team. The learning and development channels and tools provided by the Bank to employees are varied: from technical courses and crosscutting skills development programs to certifications, conferences, or workshops. In developing and delivering the programs, the Bank sought to support and facilitate the learning and education process of employees by providing quality content and using up-to date approaches. The Bank continued to optimize teaching methods and support technologies such as experiential learning, interactive platforms, and gamification techniques.

To nurture exceptional talent, the Bank offers various talent management programs that individually support, further train, and encourage both employees and leaders to take the next steps in their careers. For example, in 2024, the Leadership leadership program continued for all managers, both new and existing managers who have not previously gone through a leadership module. The program provides managers with the right tools to support, from this role, the development of the people they work with and the teams they lead. Also, in 2024, for employees in central administration, the Bank continued The Leadership Growth Center program. It is designed for managers to help them develop critical skills in this role: internal negotiation, conflict management, communication and empathy, performance evaluation and goal setting.

The Bank offers trainee programs specifically aimed at students, providing a first step towards a career. Trainees are accompanied by mentors, assigned for a specific period, and receive professional and personal training. The 2024 internship programs were designed to co-opt talent and build skills. The candidates were early-career students, future technology

specialists for business and beyond in the IT Division. Following the recruitment and selection process, several participants were selected. Their training process consisted of both the allocation of a buddy (dedicated partner), training sessions (from service providers), and a team project, through which the young people had the opportunity to apply the notions acquired in the program (learning by doing). Trainee management programs, with assignments in various departments across the Bank including non-IT areas, were implemented in 2024 to support the business with resources trained in specific specialties that can be transferred to related teams when opportunities arise. Understanding the culture, the field, and involvement in projects ensured that new colleagues were quickly integrated and had the opportunity to make relevant input, both during the learning process and afterward, after transferring to specialized positions. At the same time, the Bank continued the internships in the Headquarter. These are addressed to students or master students who want to get acquainted with the spirit and culture of a multinational organization. During an internship, participants are introduced to the workflows of a banking entity.

To respond to the growing demand for knowledge in the field of sustainability, in particular in the field of sustainable finance, the Bank offered in 2024 access to several learning resources:

- ESG Awareness Workshops: Implemented based on the Climate Fresk methodology, based on the IPCC's scientific findings. Through the nine work sessions, the program involved approximately 60 key staff members, including directors, designated ESG ambassadors, and members of the communications team. The sessions explored sustainability challenges, examining climate scenarios and the complex relationships between economic activities and environmental impacts, while developing a comprehensive understanding of corporate environmental responsibility.
- ESG Academy: Internal resource available, which includes educational resources on ESG topics, The course is divided into 10 segments, which include basic, MiFID and advanced levels, highlighting how ESG principles can be integrated into a company's business, what is the responsibility of companies towards society and the environment, and what are the main programs and laws that encourage a responsible business model.

The bank offers several programs for professional development:

- Digital Academy: Provides branch staff with comprehensive knowledge of digital channels and services, enabling them to effectively guide customers in using online banking solutions.
- Mortgage Academy: Provides staff with an in-depth understanding of lending products, in order to be able to advise customers on high standards regarding the financing options available.
- Raiffeisen School: Program with three modules addressed to both newly hired and experienced colleagues. It includes introductory courses in the company's activity, understanding products, operations, lending and customer relations.
- Raiffeisen Banking University: Program supported by internal experts of the Bank in various fields, who transmit to colleagues practical knowledge with a high level of applicability. It includes topics such as AI (ChatGPT), process documentation, leadership, and effective communication.

The bank provides employees with the Hive platform, an online learning and development platform with over 2,000 up-to-date training materials, which supports employees to develop new skills in current areas such as data science, AI, communication, programming and more.

## **Employee involvement**

To maintain high employee satisfaction, it is important to give all employees a voice. The Group has various formats in place that facilitate exchange between employees and management.

More information about formats can be found in sub-chapter [S1-2: Processes for engaging with own workforce and workers' representatives about impacts](#)

The employee surveys are an important tool for capturing employee sentiments and giving them the opportunity to anonymously provide suggestions for improvement or highlight what they appreciate. More information about the annual Employee Opinion Survey (EOS) on engagement and effectiveness can be found in sub-chapter [S1-2: Processes for engaging with own workforce and workers' representatives about impacts](#). The employee survey is conducted quarterly.

In addition to the previously mentioned Whispli tool, the Group offers various other formats to encourage communication. For example, for any type of complaint, whether related to working methods, employment terms and conditions, or other issues, the Group has invited colleagues to communicate and engage in dialogue, creating a dedicated channel for all employees to submit concerns/complaints to [salariati.sesizari@raiffeisen.ro](mailto:salariati.sesizari@raiffeisen.ro). The effectiveness of the measures will be evaluated based on how many employees use the tools provided.

The Bank offers continuous partnership between the employer and labor union for collecting feedback and being updated upon the needs of the employees, whenever needed, involving the top management representatives of both parties.

## Employee relationship

The Group does not have employees with non-guaranteed working hours employees. The Bank has the work from home framework for hybrid working arrangements at the headquarter level and it is stipulated in the Collective Labor Agreement that it is allowed also the flexible schedule, planned by the Employer which defines the activity of the employee who frequently covers his/her normal working hours by being present at work between hours that cannot be ordered according to a pre-established scheme, but without splitting the period of 8 (eight) hours.

It is of great importance for the Group to offer employees permanent and secure employment contracts in line with their needs.

All the legal provisions regarding health insurance, unemployment insurance, accident insurance, and parental leave are adhered to by the Group.

## Health

The health of employees is of utmost priority. The Group ensures that the health of its employees is not compromised in any way. The Group's objective is to constantly provide optimal conditions for work activities, ensuring the protection of the lives, health, physical and mental integrity of the employees, as well as other persons involved in the work process. Additionally, the Group strictly complies with the SSM legislative requirements. Responsibility for health management lies with Risk Prevention and Labor Protection Team.

The Group pays special attention to the health of employees and offers medical subscriptions, medical check-ups. Pregnant employees benefit from constant monitoring in collaboration with the occupational health physician to navigate this entire period safely and healthily. Pregnant employees are informed about the best recommendations and care methods during this time, as well as their rights and obligations.

First aid and defensive driving courses are integrated into the training program to respond quickly and efficiently in emergency situations and reduce traffic accidents. Employees are trained on the risks of occupational injury and illness and are informed and trained on combating workplace stress and fatigue, discrimination, and social harassment. Additionally, employees are informed and trained on workplace ergonomics, regular screen breaks and stretching exercises, as well as the importance of vacation time.

Besides physical health, mental health is important. To prevent health issues such as burnout, it is important to provide employees with a good work-life balance. The Bank also offers employee wellbeing programs, including sports activities, health, personal development, and training in preventing stress and workplace harassment. In 2024, the Bank launched a wellbeing newsletter where it explained the benefits the company is offering in the area of wellbeing, and it ran healthcare and stress prevention workshops.

The Group's expectation is that employees comply with Internal Regulations and complete mandatory OSH (Occupational Safety and Health) training every six months through a dedicated management platform, which includes materials on workplace safety and defensive driving.

In 2024, a questionnaire has been created to determine how many employees wear corrective eyeglasses, which led to the creation of a benefit that offers employees a budget for purchasing corrective eyeglasses in accordance with HG no. 1028/2006.

In 2024, the main target was to automate the training / testing process and complete it by electronically signing the OSH training sheets. Thus, the Bank implemented the OSH Management Platform. The implementation of electronic signatures for health and safety documentation has streamlined the OSH process through an automated workflow that includes training, testing, and document signing. This modernization eliminated the need for employees to travel to the office for signatures during hybrid work arrangements, while providing a comprehensive platform for generating documents, managing training materials, and collecting signatures. The new system has significantly improved efficiency by saving travel time and expediting OSH file completion, allowing employees to focus more on their core responsibilities. The effectiveness of this digital transformation is demonstrated by achieving 100% employee training completion.

The Bank uses a risk management system guideline and a list of the standards/guidelines. The process by which the company identifies the risks related to accidents at work, is the risk assessment method developed within the National Research-Development Institute for labor protection Bucharest, called the INCDPM method. The method consists in identifying all the risk factors existing at work, analyzed based on pre-established control lists and risk size quantification based on the combination of severity and frequency of maximum possible consequences for the human body. The analysis and assessment of the risks of injury and professional illness is a decisive step in the overall process of managing occupational health and safety, with reference to the strategy for selecting appropriate safety measures, which aims at: intrinsic prevention, choice of optimal protection measures and provision of risk information. Based on risk assessment and using the statistical data the Bank evaluates the risk and recommends risk prevention measures.

The reported or identified risks are processed and resolved. In addition, the company has a Health and Safety Committee (CSSM), consisting of employee representatives and employer representatives, who meet quarterly and as necessary. At these meetings, designated employees, representatives of the internal prevention and protection service, labor inspectors, and occupational health physicians are invited to participate. Current challenges and risks in the relevant areas are discussed during the meeting. These are then evaluated, documented, and resolved.

The Group maintains rigorous practices to prevent negative impacts on its workforce across all operations. It ensures this through comprehensive employment policies that comply with Romanian Labor Code, EU regulations, and internationally recognized standards from the International Labor Organization (ILO).

The Bank's procurement processes incorporate vendor assessments to protect workforce interests throughout its supply chain. In sales operations, it implemented balanced commission structures and ethical guidelines to prevent excessive pressure on employees, while the Bank's data usage follows strict GDPR-compliant protocols to protect employee privacy. When tensions arise between business pressures and workforce protection, the Bank employs a structured decision-making process that prioritizes employee wellbeing, supported by whistleblower mechanisms and communication channels.

The management of workforce impacts is primarily overseen by People, Culture and Organization Directorate, which has been strategically structured to ensure effective resource allocation across five key chapters: Talent Acquisition and Succession Planning, Compensation and Benefits, People Analytics, Diversity and Organization, Learning and Development, Employee Experience. These chapters are supported by both human and financial resources to execute organizational objectives and fulfill the organization responsibilities to employees and the community. Both the Occupational Health and Safety Department and DPO work closely with the People, Culture and Organization Tribe to ensure that workforce impacts related to health and safety and data protection are effectively managed. The organization allocates an annual budget specifically for workforce impact management, which is reviewed and adjusted based on identified needs and strategic priorities. This includes investments in necessary tools, systems, and external expertise. Where beneficial, the Group engages external consultants and partners to provide additional expertise and resources for managing specific workforce impacts.

## S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Aspects	Targets (Bank)
Secure employment	min 85% of workforce with permanent working contracts
Freedom of association/ Collective bargaining coverage / Social dialogue	All employees covered by the provisions of the collective bargaining agreement
Health and safety	100% of employees mandatory training in health and safety
Work-life balance & working time	min 80% average score of wellbeing questions employees' surveys
Training and skills development	Minimum 4 average training days/employee at bank level
Gender equality and equal pay for work of equal value Adequate wages	Maximum 5% gender pay gap by 2026 for work of equal value, exceptions only justified by objective and gender neutral factors Target of 42% for underrepresented gender for SB, B, B-1 by 2025 Start a pay transparency project in line with the EU Transparency Directive
Measures against violence and harassment in the workplace	100% of employees mandatory training
Diversity & Inclusion	min 80% average of scores D&I questions employees' surveys
Overall turnover	<=12% overall turnover in 2025

Following a comprehensive review of our previously published workforce targets in 2024, the Bank refined its objectives to better align with internal strategic decisions. This update incorporates valuable insights from multiple sources, including employee survey feedback.

For the calculation of the metrics in the following disclosure tables (from S1-6 to S1-17), only controlled Group entities that are above the 10% threshold for number of employees were considered. The figures were reported as headcounts either as of the reporting date or for a period. Where it was possible to provide either point-in-time values or average values, point-in-time values were disclosed.

## S1-6: Characteristics of the undertaking's employees

### Number of employees by contract type and by gender

31.12.2024

	Group	Bank
<b>Total</b>	<b>5,047</b>	<b>4,953</b>
<b>By gender</b>		
Male	1,318	1,290
Female	3,729	3,663
<b>Permanent employees</b>	<b>4,877</b>	<b>4,786</b>
Male	1,271	1,243
Female	3,606	3,543
<b>Temporary employees</b>	<b>170</b>	<b>167</b>
Male	47	47
Female	123	120
<b>Non-guaranteed hours employees</b>	<b>-</b>	<b>-</b>
Male	-	-
Female	-	-
<b>Full-time employees</b>	<b>4,935</b>	<b>4,843</b>
Male	1,285	1,257
Female	3,650	3,586
<b>Part-time employees</b>	<b>112</b>	<b>110</b>
Male	33	33
Female	79	77
<b>Employees who left</b>	<b>689</b>	<b>682</b>
<b>Rate of employee turnover (%)</b>	<b>14 %</b>	<b>14 %</b>

In Group workforce demographics reporting, the Group currently collect and track gender data using a binary male/female classification system. The Group evaluates ways to enhance data collection methods to better reflect the diversity of gender identities within organization.

These metrics use headcounts which, according to Group terminology, include active headcounts. This comprises all employees with valid employment contracts (excluding those on maternity or long-term leave) and excludes board members and trainees - at the end of the reporting period.

The rate of employee turnover is calculated by dividing the total number of employees who leave voluntarily, due to dismissal, retirement, or death in service by the total number of employees.

## S1-8: Collective bargaining coverage and social dialogue

### Rate of employees with collective bargaining or employee representation coverage

31.12.2024

	Group	Bank
Total employees covered by collective bargaining agreements (%)	100 %	100 %
Employees in country with significant employment (in the EEA) covered by workers' representatives (%)	100 %	100 %

Agreement is in place with Bank's employees for representation by a European Works Council.

Bank's collective bargaining agreement is a company specific agreement, not a country or sector one.

All Bank employees (100%) benefit from the provisions of the Collective Bargaining Agreement. Non-employees are not covered by collective bargaining agreement but are covered by legal requirements and contractual conditions.

## S1-9: Diversity metrics

31.12.2024

Number and percentage of persons at the top management by gender

	Group	Bank
<b>By gender</b>		
<b>Male</b>		
Supervisory Board	10	6
Management Board	7	6
B-1	30	23
B-2	70	67
<b>Female</b>		
Supervisory Board	3	2
Management Board	2	1
B-1	31	23
B-2	102	100
Supervisory Board, male in Supervisory Board, Total (%)	77 %	75 %
Management Board, male in Management Board, Total (%)	78 %	86 %
Male employees in B-1 in B-1 total (%)	49 %	50 %
Male employees in B-2 in B-2 total (%)	41 %	40 %
Supervisory Board, female in Supervisory Board, Total (%)	23 %	25 %
Management Board, female in Management Board, Total (%)	22 %	14 %
Female employees in B-1 in B-1 total (%)	51 %	50 %
Female employees in B-2 in B-2 total (%)	59 %	60 %
<b>By age</b>		
Employee age group < 30 (%)	1,235	1,232
Employee age group 30 - 49 (%)	3,023	2,950
Employee age group >= 50 (%)	789	771
Employee age group < 30 (%)	24 %	25 %
Employee age group 30 - 49 (%)	60 %	60 %
Employee age group >= 50 (%)	16 %	16 %

B-1 (Board-1) is the first level of management, after top management/Management Board.

B-2 (Board-2) is the second level of management after top management/ Management Board.

## S1-10: Adequate wages

The Group is paying all employees an adequate wage.

## S1-11: Social protection

31.12.2024

Employees are covered by social protection against loss of income due to major life events (Headcount)

	Group	Bank
Employees, which are covered by social protection through benefits offered by the organization in case of unemployment	–	–
Employees, which are covered by social protection through benefits offered by the organization in case of employment injury and acquired disability	5,047	4,953
Employees, which are covered by social protection through benefits offered by the organization in case of parental leave	–	–
Employees, which are covered by social protection through benefits offered by the organization in case of sickness	5,047	4,953
Employees, which are covered by social protection through benefits offered by the organization in case of retirement	5,047	4,953
Employees, which are covered by social protection through public programmes in case of unemployment	5,047	4,953
Employees, which are covered by social protection through public programmes in case of employment injury and acquired disability	5,047	4,953
Employees, which are covered by social protection through public programmes in case of parental leave	5,047	4,953
Employees, which are covered by social protection through public programmes in case of sickness	5,047	4,953
Employees, which are covered by social protection through public programmes in case of retirement	5,047	4,953

All the Bank's employees benefit from all the conditions stipulated in the collective labor contract and legal requirements.

In the context of organizational structure redesign, impacted employees are directed to internal job market, many of them continuing their employability with the bank. Otherwise, they are offered severance pay.

## S1-12: Persons with disabilities

31.12.2024

	Group	Bank
Employees with disabilities (%)	1%	1%

This metric is based on national law regulations. According to local laws, an employee can be classified as disabled by a designated authority if they meet specific criteria.

## S1-13: Training and skills development metrics

31.12.2024

	Group	Bank
<b>Employees that participated in regular performance and career development reviews (%)</b>	<b>100 %</b>	<b>100 %</b>
Male (%)	100 %	100 %
Female (%)	100 %	100 %
<b>Average number of training hours per employee</b>		
Average number of training hours per person for employees	53	53
Average number of training hours male employees	39	40
Average number of training hours female employees	57	58

## S1-14: Health and safety metrics

### Percentage of employees, within the own workforce, covered by the company's health and safety management system & Fatalities due to work-related injuries and work-related illnesses

31.12.2024

	Group	Bank
Employees covered by health and safety management systems (%)	100 %	100 %
Fatalities as a result of work-related injury employees	-	-
Recordable work-related injuries employees	5	5
Rate of recordable work-related accidents for own workforce (%)	100 %	100 %

The workplace safety and health audit encompasses a comprehensive evaluation of both documentation and practical implementation of occupational safety and health measures, including verification of SSM documentation compliance, employee knowledge of safety responsibilities, adherence to job requirements, work environment standards, security signaling, screen equipment usage, manual mass handling procedures, work equipment standards, personal protective equipment protocols, worker health surveillance practices, and maternity protection requirements. Non-employees are also covered by the occupational safety system.

According to national legislation, Article 30 para. (1) of Law no. 319/2006 states that, for the purposes of Article 5 letter g), the commuting accident is also considered a work-related accident if the travel was made during and on the normal route from the worker's home to the workplace organized by the employer and vice versa.

## S1-15: Work-life balance metrics

31.12.2024

### Employees entitled to take family-related leave

	Group	Bank
Parental leave - paternity (%)	100 %	100 %
Parental leave - maternity (%)	100 %	100 %
Carers' leave (%)	100 %	100 %

31.12.2024

### Employees entitled to take family-related leave

	Group	Bank
Parental leave - paternity (%)	1 %	1 %
Parental leave - maternity (%)	13 %	13 %
Carers' leave - male (%)*	- %	- %
Carers' leave - female (%)*	- %	- %

*\*Please note: In 2024, the Group did not collect this information*

All employees are entitled to family-related leaves through social policy and (or) collective bargaining agreements. The Bank has no job-sharing policy in place.

## S1-16: Remuneration metrics (pay gap and total remuneration)

### Gender pay gap

The gender pay gap according to ESRS requirements shows the unadjusted ratio on Group level based on raw data reported by the entities in scope. It purely shows the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees. This required approach is a straightforward calculation without any regression analysis (no inclusion of natural log of wages on gender and other pay factors like experience, location, education, purchasing power and tenure). Therefore, the ratio has very limited significance in this form. The gender pay gap expressed as a percentage of the average income of male employees at Group level as of 31.12.2024 is 27 per cent.

To ensure fair compensation practices and understand/monitor/analyze the gender pay gap, the Bank took a comprehensive approach that considers various factors. The gender pay gap expressed as a percentage of the weighted average income of male employees at Bank level as of 31.12.2024 is 1 per cent. The Bank analyzed each hierarchical organizational level, such as B-1, B-2, other managers, and professionals, in correlation with other relevant factors, including job complexity, seniority (level of expertise) and business segment - segmented by staff or different management levels.

The analysis used a matrix that combines the job grade (job complexity) with the organizational level and weighs each position's impact, accordingly, taking into account the number of employees per position in the bank. This approach provides a more accurate representation of remuneration practices and helps identify any potential disparities in compensation. By considering these factors, the Bank can identify any potential disparities in compensation and ensure that its compensation practices are fair and equitable. This approach allows the organisation to take a more holistic view of the gender pay gap and provide a comprehensive representation of compensation practices within the organization.

### Total remuneration ratio

At Group level, the ratio of the annual total remuneration of the highest-paid individual to the median of the annual total remuneration of all employees (excluding the highest-paid individual) for 2024 is 34 per cent.

The ratio of the total annual remuneration includes the base salary, the function-related allowance and – where applicable – the annual variable target remuneration.

The Bank generates an external equal pay report (it is not published) required by the National Bank of Romania, on pay gap every 3 years.

### S1-17: Incidents, complaints and severe human rights impacts (31.12.2024)

31.12.2024

	Group
Number of incidents of discrimination (including harassment)	2
Number of complaints filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms)	15
Total amount of fines, penalties and compensations for damages as a result of the incidents and complaints disclosed above	0
Number of severe human rights incidents connected to the undertaking's workforce	0
Total amount in € million of fines, penalties and compensations for damages related to severe human rights incidents	0

## S4. Consumers and end-users

### ESRS 2 SBM-3 Description of consumers and/or end-users

The Bank provides services to more than 2.2 million private individuals customers, offering a broad product range (e.g. account packages, and payment services, consumer finance, mortgage loans and investment products).

When talking about consumers and end-users in business it means private individuals who use the Bank's products and services for personal use, either for themselves or for others, and not for professional purposes, including private individuals who will potentially become customers. For the Bank, consumers and end-users as defined by EFRAG are regarded as identical, as private customers are typically consumers who use or intend to use its products or services. The Bank has customers from different ages and all different socio-economic background.

When it comes to investment products, the Bank considers customers who are not professional clients according to the list from MiFID II Presentation Document, available to the Client by displaying on the website at <https://www.raiffeisen.ro/ro/despre-noi/guvernanta-corporativa/mifid.html> (this also applies to companies where it cannot be determined whether the above-mentioned size criteria are met or not) are retail clients.

Types of consumers:

- Existing customers (private individuals) of the Bank, and its subsidiaries
- Prospective customers (private individuals) of the Bank, and its subsidiaries
- All other private individuals who do not fall under a) or b), but are exposed to the Bank, or its subsidiaries marketing and communication activities.

The aforementioned types: include vulnerable private individuals such as people with disabilities, women, elderly people, consumers from certain geographical areas or locations (rural, urban, farmers), migrants and refugees.

The EU Accessibility Act will be a milestone in the further improvement of inclusion and the provision of access to (quality) information for all consumers. The directive aims to ensure that people with disabilities have equal access to key products and services, thereby improving their social participation and quality of life.

End users who are particularly vulnerable to privacy impacts or to the effects of marketing strategies include vulnerable individuals such as minors, who may not fully understand financial matters and their rights, as well as elderly customers, who may have difficulty keeping up with the digitalization of banking services and the associated necessary data protection requirements.

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

#### Information related impacts

##### Impacts on Privacy and Cyber Security & Resilience

To ensure the protection goals of confidentiality, integrity, and availability of information and systems, the Management Board defines a strategy and approves a framework including policies and standards. Their implementation within the Bank is managed and monitored. The strategy, the framework of policies and standards, as well as the defined technical and organizational measures to achieve the security of information and systems are regularly reviewed to appropriately address current threat situations, technical developments, and external requirements, and to manage and minimize risks that affect the company as well as its customers and end-users.

Positive or negative perceptions of customers and end-users regarding information security, resilience, and data protection can impact trust in the financial sector as well as digital services overall. The Bank is an important bank in Romania, therefore essential for the functioning of the financial market locally, as well as for meeting the basic needs of customers, end users.

The following negative impacts could result from security incidents or weaknesses in the information security management system on individuals, groups of individuals, or society:

- Reputational damage could lead to a loss of trust in financial services or digital products,
- Unauthorized access to confidential information and misuse of such information could lead to fraud and financial losses,
- Incidents or unavailability of systems and services could lead to legal consequences or fines/penalties and/ or to obligation to compensate clients' prejudice resulted in connected with such incident,
- Unavailability of systems and data could result in customers being unable to use our services,

A solid information security management system builds trust in financial institutions, a well-functioning financial market, and digital services provided by the bank. Secure, resilient, and reliable business processes and associated systems reduce the likelihood and impact of security incidents. Financial services can be provided to customers even under adverse circumstances.

Financial institutions in general are attractive targets for cyberattacks due to the financial assets they manage and the sensitive customer data they hold.

Attempted attacks occur frequently in a bank (time horizon: short-term). Due to the implemented measures, hardly any of these incidents negatively affect customers. The positive impacts of a secure, resilient, and reliable company have both immediate and long-term effects on customers, groups of individuals, and society (time horizon: short- and medium-term).

Both, business activities and business relationships (suppliers, contractors, business partners, etc.) impact information security risk and potential effects on customers. Therefore, the Bank seeks to manage information security risks and reduce impacts through security measures.

The Bank considers its goal of providing customers with secure, resilient, and reliable services, and ensuring the responsible handling of personal data, as one of the most important prerequisites for building and maintaining customer relationships.

No specific impacts relating to information security and cyber security have been identified for specific groups. A consistently high level of security is applied to all financial services offered, ensuring the protection of information.

While it is impossible to completely prevent security incidents, regular testing of incident management processes is a vital component of our security strategy. Additionally, the Bank's systems are tested through penetration tests and simulated attacks known as Red-Teaming. The majority of attack attempts against the Bank (e.g., phishing emails or Distributed Denial of Service (DDoS) attacks) are prevented by our implemented security measures.

In the 2024 financial year, there was a noticeable increase in DDoS attacks (also on other financial institutions) aimed at overloading systems. There were no security breaches in 2024.

A variety of technical and organizational measures are implemented by the Group to protect the confidentiality, integrity, and availability of customer data. The security measures form multiple layers of defense to ward off potential threats, minimize vulnerabilities, and limit the impact in the event of an attack. Security is incorporated from the beginning in initiatives and product developments. The effectiveness of these measures, and thus the protection of systems and products, is continuously tested in various ways. The group-wide security requirements are also regularly reviewed and adjusted accordingly. This results in a continuous improvement process in terms of information security, which positively impacts the security (confidentiality, availability, and integrity) of customer data and the products provided to customers.

Actual negative impacts on short term at customer/ end user level have exceptional occurrence and mainly low to medium effects. Low to medium likelihood generally were documented for potential short-term impacts, considering the immediate effects related to privacy and cybersecurity.

### **Impacts regarding Access to (quality) information**

Access to (quality) information is the consumer's right to receive accurate data on the quality, conditions, fees, standard and cost of financial services, which is fundamental to protecting against unfair commercial practices.

The Bank aims to offer customers the best financial expertise and top digital solutions, so it created a personal and interactive way to build a financial plan, together with its customers, through Raiffeisen Bank's innovation: Smart Finance.

The Bank assists its customers with the transition to digital self-service across all channels (in branch, in call centers, in app). Access to quality banking information is enhanced through a comprehensive approach that includes multi-channel delivery (online, mobile, Smart Mobile, and in-branch), interactive financial planning tools (such as Raiffeisen Smart Finance – an interactive digital solution for individuals), and financial educational content. The Bank actively promotes an understanding of financial products and services and imparts banking expertise as part of its day-to-day role. The nature of its core business means it has close links with the subject of financial education, i.e. the competent handling of money and financial matters, also known as financial literacy.

To ensure good quality of information, training opportunities for the sales staff, with regards to knowledge and personal responsibility has to be provided. Furthermore, it offers its employees corporate volunteering opportunities, which also deal with the topic of financial literacy. The Bank uses innovative tools such as the interactive Smart Finance solution for private individual customers and SME customers, with which customers can simulate the configuration of a financial plan, based on the information they provide, adapted to their objectives, needs and desires.

Promoting financial inclusion and financial literacy is a key component of the Bank's Sustainability strategy and CSR strategy. The Bank believes that financial education plays a vital role in developing the skills needed to understand and manage personal finances effectively. It contributes significantly to individual well-being by empowering people to make informed and prudent financial decisions that meet their needs and capabilities.

Poor access to and/or poor quality of information may include damage to trust, financial harm to customers, insufficient competence and risk assessment in the capital market, erroneous investment decisions and a misunderstanding of foreign exchange risks. This can result in financial burdens for customers and/or potential over-indebtedness.

On the investment side especially, high transparency, such as accurate and complete product labeling including cost breakdowns, forms the basis for customers to make investment decisions. On the loan side, customers' financial education and the improved comparability of products and services, together with comprehensive explanations of the possible risks associated with products or services are a prerequisite to make a credit decision.

The positive impacts described above, short and medium to long term originate from the business model and are inherent to the business of banking and financial services, including asset management, which can have a significant impact on consumers' lives. Another noteworthy activity is the adaptation of branches to ensure that most of the branches are accessible to people with physical disabilities.

The Bank can positively impact society via supporting various financial education initiatives.

However, there are vulnerable groups who need special attention. Access to (quality) information is key to understanding the consequences of financial decisions. This means that, in accordance with legal requirements, materials have to be adapted for groups with special needs. For example, through adaptations on the websites, they can be used by people with visual impairment. Consumers with hearing impairment highly appreciate the availability of sign language translators. Information accessibility for some categories of people with disabilities is ensured (e.g. some website adaptation for people with visual impairment, sign language translators for retail customers with hearing impairment), and regular updates keep customers informed of product and market changes.

### **Social inclusion related impacts**

For the Group, the sustainability topics of non-discrimination and access to products and services are considered elements of financial inclusion. This not only means having access to useful and affordable financial services and products, but also the actual use of the diverse services and products. Against this backdrop, financial literacy is an important prerequisite for the safe handling of money, goal-oriented savings of partial amounts and investing in one's own financial wellbeing. In terms of responsible marketing practices, the Group strives to avoid promoting products or services in a way that creates false or misleading representations.

### **Impacts regarding Access to products and services**

The Group treats its customers respectfully, acknowledging that there are vulnerable groups who need special attention. As part of the Raiffeisen Bank International, it supports its commitment for UN Principles for Responsible Banking.

Thus, the Bank strives to remove any further barriers to its products and services. To mitigate any negative financial impact as much as possible, various measures have been taken, such as barrier-free branch access or some website adaptation for people with visual impairment.

In general, digitalization makes it much easier to access products and services. Being financially included has a direct positive impact on vulnerable groups such as people with disabilities, low incomes or who are in financial need as it improves their opportunities.

Having no access to the financial system could lead to reduced opportunities and financial disadvantages, culminating in social exclusion.

Private individuals who are likely to be affected by discrimination are categorized as a vulnerable group. The description of individuals in this specific group can be found in chapter [ESRS 2 SBM-3: Description of consumers and/or end-users](#).

By providing a reliable and secure infrastructure, the Bank plays a contributory role in safeguarding the stability and integrity of the financial system, protecting the digital economy from threats and further reinforcing the trust of its customers.

Negative impacts on customers of the the Bank are not limited to specific product categories or types but can affect the entire range of products offered. Actual negative impacts on short term at customer/ end user level have exceptional occurrence and mainly low to medium effects.

### **Impacts regarding Responsible marketing practices**

Ensuring that the Bank does not market goods or services in a way that creates false or misleading representations, or is misleading, fraudulent, or deceptive in any manner means ensuring the transparent presentation of products and services, honesty in marketing, and in compliance with legal obligations such as the GDPR (in connection with mail marketing). The positive impact of conducting responsible marketing is an increase in customer satisfaction. Correct labelling enables full transparency of terms and conditions, including prices and costs, and helps customers make well-informed financial decisions.

Additionally responsible marketing (including high-quality information) is also essential to ensure optimal investment decisions. Otherwise, decisions could be made that lead to suboptimal allocations, which are not aligned with the customer's original intentions.

If the Bank disappoints its consumers due to misleading marketing or sales practices, negative impacts can include damage to trust and financial harm to customers. Incorrectly labelled financial products might lead customers to make poor decisions, incur unmanageable costs, become over-indebted, and, in the worst cases, face personal bankruptcy. Misleading information or product designations, or the provision of incomplete information, can lead to incorrect investment decisions, resulting in financial burdens for the end-customer and potentially leading to over-indebtedness or insolvency.

These described aspects are reflected in the business strategy, particularly in product governance, distribution strategy, handling of customer information, management of conflicts of interest, and complaint management.

There are actual short-term impacts on consumers and end-users due to a confidence increase within in industry.

As described above, the business of banking and financial services is associated with great responsibilities, since the negative impacts can be severe, including over-indebtedness and in the worst-case bankruptcy of consumers.

The Bank, through its public communication activities, e.g. marketing communication, PR and other publicly available information that it publishes, can have an impact already before a business relationship exists. Marketing materials' content are validated both with the business line and with the legal / compliance department thus ensuring that all relevant information to ensure commercial success is included clearly and transparent for the customer, as well as in line with the legal requirements.

In 2024, there were no marketing communication related fines.

Actual and potential impacts on consumers are taken into consideration for defining and adapting the strategy. Examples are the Bank's Vision to 'become the most recommended financial institution', as well its Code of Conduct with clear standards for customer relations. Furthermore, it is continuously monitoring customer feedback and regularly revises the existing Customer Experience Framework (CEF).

The updated version of the Customer Experience Framework contains five strategic areas for improvement, each with specific measures assigned.

- **Understand:** striving to systematically collect feedback from its customers across as many customer journeys and contact points so that it knows with a high degree of certainty where it needs to make improvements. Another leverage factor is the introduction in 2019 of an operational customer experience management (OCEM) platform, together with the biggest provider in the market, Medallia, which would allow to collect customer feedback in real time, immediately after the interaction, shifting from collecting feedback exclusively through phone interviews performed by an external agency.
- **Prioritize:** deciding on what needs to be improved and how by reference to transaction-specific customer feedback, additional experiences from customer business insights and a range of statistical methods to maximize the impact of our improvement measures wherever customers see the greatest barriers to smooth interaction with us. The Bank develops a range of use cases for customer experience analytics to further optimize the measurement of customer satisfaction.
- **Act:** Analyzing and responding to customer feedback: To this end, the Bank have developed and launched a dedicated Customer Experience Academy to provide training at various hierarchical levels, from customer-facing employees through to product and general management. It implemented a close the loop process, which we call the Inner Loop. Detractors are addressed by branch managers address detractors to understand the root cause of their dissatisfaction and take actions to prevent these from repeating. The details of the conversation with the customers are also stored in the OCEM platform and the Bank can use them to further, in order to improve our product and channel journeys.

- Mobilize: The aim of this strategic area is to ensure that the entire organization is geared toward a shared objective and a shared understanding of the customer experience, which we achieve by conducting extensive management training and in-house communication campaigns (monthly newsletters, quarterly CX Council). The Bank also have defined specific customer experience KPIs for all employees, starting with customer facing and non-customer facing and up to the board members and our CEO
- Structure: In 2022, the Bank started to structure the working relationship between its customer experience teams and the agile product teams by means of defined processes to implement improvements in customer experience more quickly.

Additionally responsible marketing (including high-quality information) is essential at S.A.I Raiffeisen Asset Management SA to ensure optimal investment decisions. Otherwise, decisions could be made that lead to suboptimal allocations, which are not aligned with the customer's original intentions.

The strategy and business model of RAM are based on providing versatile investments for clients. Therefore, high-quality information and responsible marketing are crucial goals. Investment decisions can be made for the short, medium, or long term. Accordingly, the impact is not limited to a specific timeframe. The need for high-quality information and responsible marketing extends across various investment horizons beyond the decision-making process. In order to ensure a fair and transparent treatment for all investors, as well as participants in the voluntary pension, S.A.I Raiffeisen Asset Management SA offers on its own website, as required by legislation, updated information about the products offered, such as: the constitutive documents of the funds, KID, the unit value of the net asset, monthly bulletins, performance scenarios, information notes for investors/participants, as well as information regarding the financial situation of both the company and the managed funds.

The public communications and advertising materials offered by S.A.I Raiffeisen Asset Management SA comply with the requirements stipulated in specific legislation of the offered products: ASF Norm no. 2/2022 (which transposes the ESMA Guide on advertising communications) and ASF Norm no. 5/2006.

### **Financial risks**

In recent years, the Bank has been affected by legal cases brought against it by consumers in relation to foreign currency mortgage loans, alleged incorrect practices etc. Further information on the legal cases can be found in the consolidated financial statements under 36. Provisions. Furthermore, no short-term material financial effects from sustainability issues relating to consumers and end-users are included in the consolidated financial statements. However, in the medium to long term (five+ years), sustainability issues could potentially result in financial risks due to issues relating to failure of the complaints procedures, data protection violations, access to quality information and social inclusion.

### **Risks connected to Non-discrimination**

Failure to implement comprehensive non-discriminatory practices and inclusive policies could expose the bank to legal challenges and regulatory penalties under existing and emerging anti-discrimination laws, potentially resulting in costly settlements and fines. The Bank could face heightened scrutiny from regulatory bodies and be subject to corrective actions if found to engage in discriminatory lending practices, unfair treatment, or denial of services based on protected characteristics. Moreover, allegations of discrimination could damage the bank's reputation, leading to public backlash, negative media coverage, and social media campaigns that could impact the brand's image as a fair and inclusive financial institution. This reputational harm could result in loss of existing customers, particularly among minority and underserved communities, while also deterring potential customers who prioritize social responsibility in their choice of financial services provider.

### **S4-1 Policies related to information-related impacts for consumers and end-users and social inclusion of consumers and end-users**

In 2022, Raiffeisen Bank International developed a Human Rights Policy, which is planned to be implemented at the Bank level in the next two years. Through this policy, RBI meets its responsibility to respect human rights and manage negative impacts on human rights that it causes, contributes to, or is directly linked to.

As part of Raiffeisen Bank Internatioanal the Bank supports Raiffeisen Bank International's commitments as a signatory of the Principles of Responsible Banking to working responsibly with clients and customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

Furthermore, as a member of the Raiffeisen Bank International, the Bank, the Bank supports Raiffeisen Bank Internatioanal's commitment to the UN Global Compact (UNGC), one of the world's largest sustainable development initiatives, namely compliance with the ten UNGC principles of responsible business, which encompass core areas including human rights, labour standards, environmental protection, and anti-corruption measures.

## Group Code of Conduct

The policies the Bank has in place to manage the material sustainability issues relating to consumers include the [Group Code of Conduct](#) which, among others, covers basic rules for customer relations, including fairness, investor protection, avoidance of conflicts of interest, and non-discrimination. (For further information see chapter [G1-1: Corporate culture](#)).

The Bank follows Raiffeisen Bank International Code of Conduct that is based on the United Nations Global Compact and UNEP FI Principles for Responsible Banking, the European Convention on Human Rights, the Universal Declaration of Human Rights as well as the Fundamental Principles of the International Labour Organization.

The Bank aims to engage in business, which is in line with these principles. The Bank strives to neither directly nor indirectly finance any transactions, projects or parties, nor cooperate with any business partner (including customers, service providers and suppliers) that do not adhere to these standards or are suspected of human rights violations.

(For further information see chapter [G1-1: Corporate culture](#)). The Code of Conduct addresses the relevant sustainability issues for consumers and end-users as follows:

### Privacy, cyber security and resilience

Confidentiality and data protection is included under Customer Relations (section 2.1.), stating that:

- the Bank protects and handles the personal and confidential data of its customers appropriately.
- Information is disclosed only as required or expressly permitted by applicable laws and regulatory requirements.

### Access to (quality) information and responsible marketing practices

- the Bank is always required to provide clear and appropriate information to customers and investors, and give advice based on the customer's circumstances that are known to it.
- the Bank strives to identify, and avoids potential conflicts of interest in, its business activities and has stringent internal guidelines in this respect. Staff members must ensure that their own interests do not conflict with their obligations towards the Bank or with the Bank's obligations towards its customers.
- the Bank aims to enable its customers to make informed decisions and trains its staff accordingly. It also offers financial education as a complementary measure. False or misleading marketing and advertising are unacceptable to the Bank. It seeks to avoid the risk of over-indebtedness among borrowers and treats customers who are experiencing repayment difficulties fairly.

### Non-discrimination

The Bank does not discriminate against its customers and, in connection with its business decisions, it generally does not take into consideration the customer's sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation.

### Access to products and services

The Bank provides products and services for which it holds the relevant licenses and has the required expertise and infrastructure in place. The Bank is committed to providing its products and services in the best possible way according to the interests of its customers. Its goal is to offer sustainable products and services to support its customers in their transformation to a more sustainable future, while also making a positive contribution to society.

### Responsible marketing practices

Doing business in a lawful, ethical, responsible, and sustainable way is a crucial part of the Bank's corporate culture. The Code of Conduct is intended to guide its daily actions involving internal and external stakeholders. As mentioned above, it defines the standards for customer relations, including the protection of personal and confidential client information, the commitment to offering excellent products and services according to the interests of the Bank's customers, maintaining high integrity and fairness in customer dealings, offering clear and appropriate information to customers and investors, and striving to identify and avoid potential conflicts of interest on the basis of stringent internal guidelines. False or misleading marketing and advertising are unacceptable to the Bank.

## Information Security Policy

The Bank has an Information Security Policy and standard framework (comprising 16 standards) that defines the organizational and technical requirements for information security. The Information Security Policy addresses the scope, objectives, principles, roles and responsibilities, as well as compliance with external requirements related to information security.

The Information Security Policy and its associated documents defines the security requirements for the proper and secure use of IT services within the Bank. It is about protecting the Bank, its businesses, employees, and customers to the highest degree possible.

The goal is to address security threats that could jeopardize the confidentiality, integrity, and/or availability of data, as well as the privacy of customers and/or employees, the reputation of the businesses, and the business outcomes effectively.

A key objective of these defined security requirements is to provide customers with reliable and secure services and products by managing risks and reducing the likelihood and impact of incidents through appropriate measures.

The Bank's Information Security Management System encompasses the following areas:

- information security strategy
- security of personnel from joining to leaving the company
- information security in initiatives and projects
- secure and resilient corporate infrastructure, Secure software development and secure operation of financial and banking products
- performing security assessments and agreeing contractual security requirements with security-relevant suppliers as part of supplier management
- compliance with information security requirements from regulatory and contractual obligations

The security requirements defined by the Bank aim for a very high level of information security to best protect customer data and IT system adequately.

The most senior level that is accountable for the implementation of the information security policy is the Chief Operating Officer (COO). Monitoring of compliance with the security policies and standards is carried out within regular internal processes.

The key legal frameworks and international standards that are included in the information security policy and in addition to the legal requirements according to the data protection policy are:

- Payment Service Directive: sets out security requirements for payment services and enhances protection of consumers and businesses by making payments safer and more secure. Risks of misuse and fraud are reduced and trust in financial transactions is strengthened.
- Network and Information Security Directive: sets out measures for a high common level of cybersecurity in essential and important entities across the EU. The aim is to enhance the security and resilience level of organizations which are providing essential services to consumers and end-users.
- European Banking Authority Guidelines (EBA): EBA as part of its supervisory tasks set out mandatory, topic-specific guidelines to ensure stability and security within the EU banking sector. This increases the resilience and security of financial institutions as well as their products.
- Digital Operational Resilience Act (DORA): DORA aims to enhance the digital operational resilience and security of the EU financial sector. An affective risk management as well as appropriate measures and a comprehensive testing program strengthen the digital resilience and the security of financial institutions as well as their products. Among others, financial institutions need robust incident response and recovery plans, manage their third parties and establish strict requirements for ICT risk management.

The protection of confidentiality and privacy are essential objectives of the Information Security Policy (Article 12 of the Human Rights Convention).

The Bank's information security management system (ISMS), including its policies, standards processes and measures, is built to appropriately protect the confidentiality, integrity and availability of information and systems. The implementation of the information security requirements is regularly assessed and tested. The ISMS is continuously improved to enhance the security measures and their effectiveness.

The Bank's information and cyber security policy is aligned with internationally recognized instruments that are relevant to consumers. The policy emphasizes adherence to high standards of information and cyber security, confidentiality, integrity, and availability of data, as well as compliance with relevant internal and external regulations, including GDPR.

The Bank has implemented robust processes, procedures and measures designed to swiftly identify, react to, and respond to security incidents. Incident response plans enable the Bank to minimize the impact, quickly restore services to normal operation, and provide effective remedies for customers and end-users. This proactive approach includes continuous monitoring and a dedicated incident response team that is regularly trained. By implementing and continuously improving efficient processes, procedures, and measures to maintain information security, the Bank strengthens the resilience of its operations and upholds the trust and confidence of its stakeholders.

The needs and expectations of stakeholders are analyzed annually, and adjustments to the security requirements are derived as necessary. Improvements and adjustments to processes are made to ensure compliance with the GDPR

All information standards within the Bank are made accessible to everyone and are regularly trained on. Appropriate security requirements are contractually agreed upon for our suppliers and service providers.

Under Article 16 of the Treaty on the Functioning of the European Union (TFEU), the EU is obliged to establish data protection regulations for the processing of personal data.

In the 2024 revisions of the information security standards, requirements have been formulated more clearly, redundant elements have been removed and errors have been corrected. New legal requirements (for example, DORA requirements) have been included in the information security policy and the respective standards framework.

### **Data Protection Policy**

The Bank has a data protection policy. This policy is implemented to establish the framework, principles, responsibilities, and minimum standards for compliance with GDPR (Regulation (EU) 2016/679), national legislation, and related requirements. The goal is to ensure that the protection and rights of individuals are uniformly ensured and that penalties are avoided.

The data protection policy covers the material and territorial scopes, as well as the principles for processing personal data. These principles are lawfulness, processing in good faith, transparency, purpose limitation, data minimization, accuracy, storage limitation, and integrity and confidentiality. The Bank must be able to demonstrate compliance with these requirements and therefore implement an appropriate accountability process. The Bank monitors data protection policies through regular internal reviews, under supervision by the data protection officer, to ensure continuous adherence to data privacy standards. This covers the following elements:

- Compliance with the rights of the data subjects (i.e. affected persons)
- Compliance with the principles of the GDPR
- Compliance with the obligations of controllers and processors
- Maintaining a record of processing activities in accordance with Art. 30 GDPR
- Information obligation towards the data subjects in accordance with Art. 13, 14 GDPR
- Compliance with the provisions on automated individual decision-making in accordance with Art. 22 GDPR
- Notification of personal data breaches to the supervisory authority and the data subject
- Conducting a Data protection impact assessment in accordance with Art. 35 GDPR
- Transfer of personal data to third countries or international organizations
- Employee training.

The most senior level that is accountable for the implementation of the policy is the Management Board. All heads of divisions that process personal data are responsible for the implementation of the GDPR in their area of responsibility.

Legal basis:

- GDPR (General Data Protection Regulation): GDPR is a European Union law that sets guidelines for collecting, using and protecting personal data. It ensures that organizations handle natural people's data responsibly, giving individuals more control over their personal information. Under GDPR, companies must be transparent about how they use personal data and keep it secure, with strict rules for sharing and storing this personal information. This regulation promotes ethical data use and enhances trust with stakeholders.
- National data protection legislation
- Guidelines and other documents of the European Data Protection Board and the National Data Protection Authority
- European standards:
  - ePrivacy Directive: The ePrivacy Directive is an EU set of rules that focuses on protecting privacy in electronic communication. It governs how organizations handle data such as cookies, emails, and phone numbers,

ensuring that people's online interactions remain private and secure. This directive complements GDPR by specifically targeting privacy in the digital world, helping organizations to maintain responsible data practices online. The directive ensures respectful and secure online communication with individuals and builds digital trust.

The Bank aligns its privacy policies and practices with internationally recognized standards to protect consumers and end-users, reflecting its commitment to responsible business conduct within the ESG framework. This alignment is demonstrated in the following ways:

UN Guiding Principles on Business and Human Rights:

- Respecting privacy as a human right: the Bank respects the privacy rights of individuals by protecting customer data in the sense of the data protection laws and limiting its use to necessary, transparent purposes. Regular assessments to prevent privacy risks are conducted, giving consumers confidence that their personal information is handled responsibly.
- Grievance mechanisms: clear and accessible channels for customers to raise concerns or request support regarding their privacy rights are provided. This aligns with global human rights principles and the GDPR, offering customers a path for resolving issues.
- the Bank has not identified any cases of non-compliance with the UN Guiding Principles on Business and Human Rights, or OECD Guidelines relating to consumer and end-user data privacy. The Bank's observance of GDPR and data protection standards ensures alignment with these frameworks.
- Fair and non-discriminatory treatment: while primarily a workplace standard, the Bank's fair treatment of consumers and its policies prevent bias in data handling and ensure that all customers receive equitable service without discrimination.
- Responsible employee practices: the Bank trains employees to handle consumer data responsibly, preventing misuse and aligning to ethical behaviour, which indirectly benefits consumers by ensuring that data is treated securely and fairly.

Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises:

- Transparency and responsible marketing: data practices follow OECD standards by providing clear information on data use, securing consumer consent, and respecting marketing preferences. This approach ensures that consumers understand and control how their data is used.
- Data security: the Bank applies rigorous data protection measures, ensuring that customer information remains private and secure in line with the principles of responsible business conduct.

The needs and expectations of stakeholders are analysed annually, and adjustments and improvements are made as necessary.

The data protection internal rules and procedures are accessible to the employees via intranet, and training is provided on a regular basis. Appropriate security requirements are contractually agreed for the Bank's suppliers and service providers.

Privacy and data protection are rights enshrined in certain EU treaties and the Charter of Fundamental Rights of the European Union. The Charter explicitly includes a right to the protection of personal data (Article 8). Once the Treaty of Lisbon came into force in 2009, the Charter of Fundamental Rights attained the same legal status as the EU's constitutional treaties. The EU institutions and bodies, as well as the Member States, are therefore bound by the Charter.

Furthermore, under Article 16 of the Treaty on the Functioning of the European Union, the EU is obliged to establish data protection regulations for the processing of personal data.

The Bank's data protection policy is designed to identify, manage, and mitigate risks relating to the privacy and security of consumer and end-user data. It addresses material impacts and ensures compliance with GDPR to protect personal data and maintain customer trust.

The Bank is committed to respecting the data privacy rights of consumers and end-users aligning with international human rights standards including GDPR. This commitment is embedded in RBI's data protection policy, which governs the collection, processing and safeguarding of personal data.

The Bank respects consumer and end-user privacy rights by adhering to GDPR principles, including lawfulness, fairness, transparency, and data minimization. The Bank's approach ensures that all personal data is handled in a manner that upholds human rights and data privacy.

The Bank engages with consumers and end-users transparently, providing clear information on data collection practices and obtaining consent where required. This approach ensures that consumers are aware of their rights and the Bank's data protection practices.

Data privacy:

- Every person has the right to the protection of personal data concerning them.
- This data must be processed fairly and lawfully for the specified purposes and based on the consent of the data subject or another legally established legitimate basis. Every person has the right to access data concerning them and the right to rectify such data.

Information regarding data protection and the rights of data subjects can be found on the Bank website at:

- [Policy on personal data processing and data privacy](#)
- [Cookies policy](#)

## **Retail Credit Risk Policy**

The Bank's Retail Credit Risk Policy establishes the rules and minimum requirements for lending to private individuals (consumers). It outlines detailed eligibility criteria and procedural checks for the lending process, including provisions related to access to quality information. Compliance with the policy is monitored primarily by management and the relevant departments at the Bank as part of regular internal processes.

The Bank is dedicated to upholding the highest standards in customer service and protection. The Retail Credit Policy focuses on access to (quality) information as follows:

- Customers are thoroughly informed about the implications and risks associated with different loan types
- Loan decisions are documented and stored to ensure transparency and clarity for customers regarding their loan applications.

The credit risk policy for the retail segment is correlated with the Bank's risk strategy and the regulations in force.

The most senior level that is accountable for the implementation of both policies is the Risk Retail Directorate.

The policy supports the human rights principles on the one hand by ensuring that lending decisions are made based on objective criteria and without discrimination. On the other hand, it aims to assess customers' loan affordability to prevent over-indebtedness and stabilize their financial situations through responsible lending practices. In terms of customer engagement, it ensures that decisions are clear, rule-based, equal, and thoroughly documented, providing a transparent and auditable process.

The policy is based on European directives and regulations, as well as all applicable local standards. The policy is updated periodically to ensure compliance with all applicable regulations.

## **Restructuring Norm & Procedure for Private Individuals customers**

Restructuring Norm & Procedure for Private Individuals customers:

- sets the rules and minimum requirements for restructuring loans for customers in financial difficulty
- defines the eligibility criteria and process requirements for restructuring efforts and addresses access to quality information, the Bank's products and services and non-discrimination.

The documents a crucial role in assisting customers facing financial difficulties by offering solutions to manage and repay their debts, thereby helping them regain financial stability and avoid severe economic hardship.

The restructuring policy, among others addresses:

- access to (quality) information, as customers are kept informed throughout the entire restructuring process, ensuring they understand each step. All communication is tracked and recorded to maintain transparency and allow for auditing.
- access to products and services, as the documents strives to ensure that customers have access to both preventive and reactive restructuring options to support them during financial difficulties.
- non-discrimination, as eligibility for restructuring is based on clear, documented criteria to ensure fairness and consistency

In terms of customer engagement, these documents ensure that decisions are clear, rule-based, equal, and thoroughly documented, providing a transparent and auditable process.

The Bank's Restructuring Norm & Procedure are published on Intranet in order to be accessible to everyone involved in the process.

The Bank is dedicated to upholding the highest standards in customer service and protection. This documents reflects its commitment to providing transparent, fair, and supportive services to all our customers, with special attention to the non-discriminatory practices.

Compliance with the respective policy is monitored primarily by management and the relevant departments at the Bank as part of regular internal processes.

### **Retail Investment Product Distribution**

The retail investment product distribution regulation and its supporting documents defines the basic principles and guidelines for the sale of investment products to retail clients under the MiFID II regime for all retail client segments (Mass, Premium, Private Banking – FWR).

The distribution of investment products is performed based on the workflows mentioned in the internal product procedures, they define the basic principles and guidelines for the distribution of investment products to the retail customer segments (Mass, Premium, Private Banking – FWR).

MiFID II ensures that consumers (investors) are well-informed about the financial products they are considering. This regulation requires firms to provide clear, accurate, and comprehensive information about financial instruments, ensuring that investors understand the risks, costs, and features of the products. The goal is to protect investors by promoting transparency and helping them to make informed decisions. Additionally, MiFID II includes provisions such as the appropriateness test and suitability test. The appropriateness test helps financial institutions in the EU to ensure that complex financial products are suitable for the investor based on their knowledge and experience. The suitability test (which applies in cases of investment advice) assesses whether a product is suitable for an investor's individual circumstances, financial situation, and goals.

Compliance with the respective procedures is monitored primarily by relevant departments at the Bank as part of regular internal processes.

Through implementation of the policy, the following standards are adhered to: Directive 2014/65/EU (MiFID II), Delegated Directive (EU) 2017/593 (Supplement to Directive 2014/65/EU), Delegated Regulation (EU) 2017/565 (Supplement to Directive 2014/65/EU), Final report on the guidelines on product governance requirements under MiFID II (ESMA35-43-620), and Delegated Regulation (EU) 2021/1253, 27 January 2022 | ESMA35-43-2998.

The distribution strategy is governed by the Raiffeisen Bank International directive Retail Investment Product Distribution Regulation and implemented in the internal systems regarding the eligibility of the financial instrument in the case of the purchase of a certain product by a certain customer segment.

The product distribution strategy for retail customer segments, part of the bank's distribution strategy, is approved by the Investments Committee which provides the minutes or any information related to the distribution to the Capital Markets Product Management and Support Activities Department to allow the administration of the product governance process. The Bank follows a segment-based approach when it comes to investment services. The appropriateness test (assessing client knowledge and experience) is mandatory. The products include ESG options and among the products some are available for regular savings plans.

### **Conflicts of interest policy of the Bank**

The Conflicts of interest policy of the Bank aims to consider and manage conflicts of interest in daily operations. Its goal is to maintain the reputation with customers, other business partners, and third parties to increase the likelihood of business success and to avoid conflicts of interest that could harm customers. This aligns with the objective of responsible customer handling.

Conflicts of interest, as defined in art 78, 79 Law 126/2018, include conflicts between the entity's interests, customer interests, or interests of the irrelevant persons (employees), or other persons directly or indirectly connected through control with the entity, on one hand, and its customers or, which may arise in the provision of respective services by the subsidiaries. General measures to avoid conflicts of interest include creating confidentiality zones, maintaining a conflict-of-interest register, conducting employee training, regularly reporting to the relevant management. The conflicts of interest policy align with the customer expectation of access to quality business practices (protection against unfair business practices).

The internal procedures governs the implementation of MiFID II requirements within the legally prescribed framework and establish minimum standards for conduct relating to the provision of securities services and investment activities. The Product Governance procedure governs an honest, sustainable, and customer-focused product policy. Monitoring occurs through regular meetings of the Product Governance Committee as well as annual product reviews. This aligns with customer expectations of access to quality information.

The Compliance Directorate of the Bank is responsible for the creation, implementation, application, and updating of the conflicts of interest policy.

Through the implementation of the Conflict of Interest Policy, the Bank respects the legal requirements specified in relevant national and international regulations, guidelines and laws. [Law 126/2018, Regulation 5/2019, Regulation 10/4/2018, Delegated Regulation (EU) 2017/565, Delegated Directive (EU) 593/2017].

In summary, these refer to organizational requirements for investment firms (credit institutions, SSIF's) and the conditions for the exercise of their activities and establish minimum standards for conduct rules.

The interests of investors as key stakeholders play a central role in the conflict of interest policy. The conflict of interest policy aims to avoid conflicts of interest and, where this is not possible, to disclose and resolve them to prevent or minimize harm to clients. The conflict of interest policy corresponds to the customer expectation of 'access to quality' (protection against unfair business practices). Considering the interests of key stakeholders in policy formulation is evident in the requirement that customer information must be honest, fair, clear, understandable, and not misleading. In the application of MiFID II obligations under Law 126/2018, customer classification is determined, thereby delineating retail clients.

The current conflict of interest policy is published on the's website at <https://www.raiffeisen.ro/ro/despre-noi/guvernanta-corporativa/mifid.html> under Corporate Governance. It is also accessible internally to all employees as a directive. The product governance internal regulation is aimed at employees of the Bank and is accessible internally to all employees.

The Conflict of interest policy establishes a structured and proactive approach to avoiding and disclosing conflicts of interest, aiming to protect and uphold the interests of customers. This demonstrates that customer needs and interests are central and actively incorporated into service delivery. This corresponds to the customer expectation of access to quality (protection against unfair business practices). The Conflict of interest policy describes measures for handling and resolving conflicts of interest that consider investor needs.

In case a conflict of interests is identified (potential or real), the procedures and internal measures should effectively prevent the risk of damage clients' interests to materialize. In the exceptional case where we cannot manage such a conflict, the situation that will be communicated to the client and the Bank will request express consent for the continuation of the provision of financial investment services. The client will decide whether to continue to receive services from the Bank.

The Bank respects the confidentiality of information received about or from its customers. Therefore, the Bank complies with all applicable laws regarding the management of non-public information and privileged information and applies, within the information circulation flow, the "need to know" principle, respectively, within the Bank, information received from or about clients is disclosed exclusively when they are necessary for the provision of a service to client's financial investments and/or auxiliary financial investment service. Thus, the Bank also defined and maintains informational barrier zones ("Chinese Walls") to prevent access potential, unauthorized use, and improper use of information non-public and/or privileged information.

For a fair access to the Bank's products and services the Conflict of Interest Policy of the Bank aims to consider conflicts of interest in daily operations. Its goal is to maintain reputation with customers, business partners, and other third parties, thereby increasing the likelihood of business success and avoiding conflicts of interest that could harm customers. This aligns with the objective of responsible customer management.

### **Conflicts of interest policy - S.A.I. Raiffeisen Asset Management SA**

S.A.I. Raiffeisen Asset Management SA promotes high standards of ethics and integrity in the relationship with its investors or participants of the voluntary pension fund, as well as with business partners in accordance with the regulatory framework and group standards.

Conflict of interest can include conflicts between the entity's interests, customer interests, obligations to funds, or interests of the legal entity (management company), its relevant persons (especially employees of the management company), or other persons directly or indirectly connected through control with the management company, on one hand, and its customers or between two or more managed funds or customers among themselves.

In order to avoid conflicts of interest, employees and members of management bodies' activity is governed by transparency, integrity and legitimate behavior, impartiality and segregation of responsibilities. General measures to avoid conflicts of interest include creating confidentiality zones, maintaining a conflict of interest register, conducting employee training, regularly reporting to the relevant management, and conducting continuous review by internal control.

The legislation provides for the right of investors to honest, clear, and non-misleading information and the publication of essential information documents for all managed funds by both the investment fund administrator and their intermediary/distributor.

This aligns with customer expectations of 'access to quality information' and 'responsible marketing'.

The directive on product governance adheres to conduct rules for the provision of securities services and investment activities, thus also aligning, in a broader sense, with the right to honest, clear, and non-misleading information and the protection of investors.

The Conflict-of-interest policy of S.A.I. Raiffeisen Asset Management SA establishes a structured and proactive approach to avoiding and disclosing conflicts of interest, aiming to protect and uphold the interests of customers and shareholders. This demonstrates that customer needs and interests are central and actively incorporated into service delivery. This corresponds to the customer expectation of access to quality (protection against unfair business practices).

The directive on providing information to customers of S.A.I. Raiffeisen Asset Management SA stipulates that all information directed at customers must comply with the directive's requirements. This includes a precise description of investment policies, a balanced presentation of benefits and risks, and consideration of sustainability-related aspects. It demands that all customer information must be honest, fair, clear, understandable, and non-misleading. Additionally, it requires a balanced presentation of

benefits and risks, ensuring the information is comprehensible and clear for the target audience. This demonstrates that a responsible and transparent approach to customers is paramount. This aligns with customer expectations of access to quality information and responsible marketing practices. It emphasizes the importance of providing clear, fair, and non-misleading information, which protects the rights and interests of customers.

The Compliance Office of the S.A.I. Raiffeisen Asset Management SA is responsible for the creation, implementation, application, and updating of the Conflict of interest policy. The interests of investors as key stakeholders play a central role in the conflict of interest policy of S.A.I. Raiffeisen Asset Management SA. The conflict of interest policy aims to avoid conflicts of interest and, where not possible, to disclose and resolve them to prevent or minimize harm to customers. The conflict of interest policy aligns with the customer expectation of access to quality (protection against unfair business practices).

### **Remuneration policies and practices related to the sale and provision of retail banking - Annex to the Bank's Remuneration Policy**

The annex relates to the Sale and Provision of Banking Products and Services in the Retail Banking Business: Implementation of an EBA guideline: EBA/GL/2016/06. Consumer interests are considered in the directive to ensure that compensation does not create incentives for natural persons involved in sales to prioritize their own interests or those of the institution over those of the consumer.

Stakeholders affected include natural persons involved in the sale and provision of banking products and services to retail customers at the Bank. The consumer is protected by ensuring that the compensation does not create incentives for these individuals engaged in sales to prioritize their interests or those of the institution over the interests of consumers. The PCO Directorate is accountable for the guideline on compensation policy and practices related to the sale and provision of banking products and services in retail banking.

The Bank operates in the Romanian market, so the annex's content applies geographically to this area.

The Bank's Remuneration Policy and the Annex Remuneration policies and practices related to the sale and provision of retail banking products and services is accessible to all individuals affected by it through the Intranet. S.A.I. Raiffeisen Asset Management SA applies within its Remuneration Policy the ESMA Guidelines on remuneration practices under UCITS. The main outlines of the Policy are published on S.A.I. Raiffeisen Asset Management SA website. In its financial statements S.A.I. Raiffeisen Asset Management SA also includes figures on how fixed and variable remuneration are allocated.

### **Procedure regarding the management of complaints received by the Bank**

This procedure complies with the applicable general regulatory/legal framework:

- Instructions from 20.01.2020 regarding the governance framework for retail products and complaints in the financial-banking sector (issued by NBR)
- EBA/GL/2015/18 Guidelines on product oversight and governance arrangements for retail banking products
- Guidelines for complaints-handling for the securities sector (ESMA) and banking sector (EBA) (JC 2018 35)
- ASF Regulation no. 9/2015 regarding the procedure for resolving petitions concerning their activity in the capital market by entities regulated and supervised by ASF under Law no. 297/2004 regarding the capital market and Law no. 74/2015 regarding alternative investment fund managers.
- Specific legislation for the domain (e.g. personal data protection, prevention and combating of money laundering and terrorist financing, etc.) or for the product/service that is the subject of the complaint (e.g. payments, loans, etc.)

By issuing complaints, consumers and other end-to-end users are ensured to be able to speak up and be heard by an independent employee of the organization regarding their grievances. Failure to establish a complaint management channel constitutes non-compliance with the applicable law and thus could lead to severe fines and sanctions by authorities as well as reduced trust and credibility on the market.

In the Bank, complaints management is supervised by a specialized department in head office according to established procedures and mechanisms. Thus, the Complaints Management Department oversees the recording, processing, and quality assessment of complaints. Quarterly reporting includes dashboards with complaints overview for the Bank's management & Raiffeisen Bank International.

From Bank perspective, a complaint is the request / notification by which a client / non-client expresses dissatisfaction with the Bank's services / products.

Complaints related to data protection and requests from private individuals relating to their rights, according to data protection legislation, are supervised by the DPO.

Complaints are viewed as valuable opportunities to identify process and product improvements and enhance customer satisfaction. This mindset is embraced by all employees and aligns with its vision. The Bank takes customer concerns and feedback seriously and strives to find solutions that improve its processes and products, thereby contributing to customer satisfaction. More information is available on the [website](#). The most senior level that is accountable for the implementation of the procedure on customer complaint management is Director of Customer Interactions, who informs quarterly the Management Board via complaints management dashboards.

Customer complaint management aligns with the regulatory requirements and EBA/ESMA guidelines to ensure effective complaint management across the Bank.

For the investment business, S.A.I. Raiffeisen Asset Management SA complaint management policy implements relevant regulatory national and international requirements, such as the guidelines of ESMA and FSA regulations.

The complaint management policy aligns with human rights principles by ensuring that complaints are treated seriously, handled transparently, and customers are kept informed about the status of their complaints.

The EBA (European Banking Authority) and ESMA (European Securities and Markets Authority) consider consumer interests when defining their complaints policies by ensuring that the policy addresses transparency, fairness, and the effective resolution of disputes, aligning with consumer protection regulations and guidelines, and promoting trust and confidence in the financial services industry.

To make the content of the procedure on customer complaint management available to internal stakeholders, it is published in the dedicated section on the Intranet. All the information is available to customers and other external stakeholders on its website at: <https://www.raiffeisen.ro/ro/home/contact.html>.

According to the UN Guiding Principles on Business and Human Rights, a grievance mechanism at the corporate level allows complaints pertaining to corporate human rights violations to be submitted and provides remediation. This mechanism must be effective, practicable, easily accessible, and independent. To realize these standards, the Bank has established appropriate processes. When it comes to grievance mechanisms and mechanisms for seeking advice and raising concerns, the Bank has established procedures and internal structures to combat human rights abuses (e.g., a complaint management system).

Complaint management is seen as an opportunity to improve customer satisfaction. Clear processes for documenting and handling complaints are described, which can be seen as a measure to support human rights, as it involves handling customer complaints and thus safeguarding customer rights. Further details can be found in the chapter [S4-3: Processes to remediate negative impacts, and channels for consumers and end-users to raise concerns](#).

### **Policies regarding responsible marketing practices**

Raiffeisen Bank International Marketing Policy governs marketing communication in the Bank, to ensure responsible marketing practices via making the [Advertising and Marketing Communications Code by the International Chamber of Commerce](#) mandatory to follow in its latest version. In 26 articles, the ICC advertising code defines the principles of responsible advertising and marketing communications, among them, the topic of responsible marketing practices (Article 23 ICC Code) the topic of non-discrimination (Article 2 ICC Code).

Locally, the Group has a Marketing Campaign Approval Flow - rule on marketing materials and advertising communications related to financial investment activities and services and/or financial instruments. The document is addressed to all the Bank's employees who are involved in the activity of creating and/or validating marketing materials and advertising communications

addressed to investors or potential investors in connection with the financial investment activities/services and/or financial instruments provided by the Bank. In addition to these policies, the Bank follows all specific legal requirements in the area of communication with consumers, be it international standards such as GDPR or local regulations. Accountable for the implementation is the Marketing, Communication and Customer Experience Directorate.

Regular measurements of customer satisfaction and the customer experience are used to document and analyse the engagement with customers. The Bank continuously collect customer feedback on its most important products, the customer journey and personal sales channels. Digital channels (website, internet banking, mobile banking and social networks) are continuing to enjoy rapid growth in popularity and have also become an integral part of all measurements. Results are carefully evaluated, and corresponding measures put in place. Objective criteria, such as the ratings for its apps in app stores, show that the offered services via digital channels are meeting with a good response among the customers.

Surveys consistently show that trust remains at the top of the list when it comes to choosing the right banking partner. Since trust is based on honesty, it is important to the Bank that its products and services are communicated clearly and transparently to all customers and stakeholders. When advertising and marketing the Group products, the Bank applies strict guidelines aimed at providing our customers with comprehensive, easily intelligible information and protecting them from losses. Furthermore, false or misleading information is not permitted under any circumstances, to guarantee that customers are protected from making the wrong decisions or from high costs that could at worst lead to bankruptcy. Risks that may be associated with the Group products must therefore be clearly demonstrated and explained to customers, while taking care that all information is accessible to all.

#### **S4-2: Processes for engaging with consumers and end-users about impacts**

The Bank strives to achieve active engagement with consumers and end-users to understand and address their interests and concerns, as well as actual and potential impacts on them.

To achieve this, is effectively incorporated by facilitating complaint management and various other channels across the organization, which are used by both external and internal stakeholders to collect feedback. This approach ensures the effective management of both actual and potential impacts.

Regarding external authorities with control attributions (NBR, NACP, ARB, ANSPDCP, ASF etc.) may also be addressed.

Customers who wish to submit a complaint to the Bank can address the Bank's complaint management via various channels. The complaints are registered in CRM, being included in categories that allow automatic allocation in the analysis to the responsible person (specialists from various departments).

For complaints specifically related to payment services, as per payment services legislation, the Bank responds within 15 business days. In exceptional circumstances beyond the bank's control, if it cannot provide a response within this timeframe, the Bank may extend the response period up to a maximum of 35 business days from the complaint receipt date. The client will be informed of any such extension.

Furthermore, the Bank engages with consumers and end-users directly when they intentionally contact the Bank or through customer surveys to obtain structured feedback from consumers and end-users.

The Complaints Management Department is led by a Department Manager, who oversees a team consisting of customer relations coordinators and customer complaints advisors. The most senior responsibility regarding complaint management lies with the Director of Customer Interactions.

Complaint root causes are identified by every business department and communicated to Compliance for further analysis. Furthermore, corresponding mitigation measures are planned.

The Bank takes every complaint brought to its attention seriously and with the utmost concern. Every complaint is carefully analyzed by complaint specialists together with the addressed or concerned business department. All claims made by consumers are carefully and independently investigated until a resolution is agreed. Complaints from specifically vulnerable customers may trigger the direct involvement of middle or senior management.

At S.A.I. Raiffeisen Asset Management SA complaint management is situated within the Compliance department.

#### **Engagement regarding privacy and cyber security & resilience**

The Bank is committed to ensuring the highest standards of data protection and privacy for its consumers, as essentially required by law, through the following practices as a basis for engagement:

- Transparency and consent: the Bank strives to ensure that all communication with consumers about the use of their personal data privacy and its potential impacts is transparent. This includes clear explanations in the privacy information in accordance with Art. 13 and Art. 14 GDPR of how data is collected, used shared, and stored .
- Consumer rights engagement: the Bank has legally compliant processes for consumers to exercise their rights under the General Data Protection Regulation (GDPR), including the right to access, correct, delete, or port their data.
- Sustainable and ethical data use: for each process involving personal data, the Bank strives to ensure ethical data use by adopting fair data practices, and preventing misuse of data in ways that could harm consumers. Personal data is mainly used only for the original purpose that it was collected. Further processing is only possible if there is compatibility with the new purpose in accordance with the principles of GDPR.
- Regular audits and reporting: the Bank conducts monitoring of data protection practices to ensure that consumer data is handled according to GDPR and engages with customers in several ways, focusing on transparency, risk mitigation, and responsible data handling.

In cases where data is processed based on legal obligations (KYC, AML regulations), for example, customers are informed about the data processing during the onboarding process. Customers have the opportunity to learn about the conditions at any time (e.g., online information on data processing according to Articles 13 and 14 of the General Data Protection Regulation (GDPR), contacting the data protection officer). If customers have already consented to specific data uses, such as marketing or service improvements, the Bank will not contact them for every related action, especially if the processing remains within the agreed scope.

In the event of a data breach involving a high level of risk for the data subjects, the Bank, as legally required, will directly inform the affected customers.

The Bank informs its customers about their rights under the General Data Protection Regulation and about the processing of their personal data through a privacy policy in accordance with Articles 13 and 14 GDPR on the Bank's website. Additionally, this privacy policy is also attached when sending terms and conditions to customers if there have been changes to the privacy policy. The initiative and directive for this come from the data protection officer and are implemented by the respective departments.

### **Engagement regarding access to (quality) information**

The perspectives of consumers and end-users are collected continuously through regular measurements of customer satisfaction and customer experience (see [Impacts regarding responsible marketing practice](#)) regular tracking of the Bank's brand perception, as well as the evaluation of the feedback obtained via complaint management processes.

Engagement occurs with consumers and end-users directly, both when consumers and end-users actively contact the Bank, or when it commissions market research to obtain structured feedback from consumers and end-users.

At the Group level, end-customers can choose from various channels (call center, email, website form, mobile banking app, branch visit, letter) to submit complaints. Relevant information can be found on the homepage under "Contact" section. Relevant processes are embedded in the organizational structure in accordance with the service directive for complaint management of the Group.

Customer Engagement at the Bank takes place at various stages, and at both regular and irregular (or event-based) intervals. Examples of regular engagement are the tracking studies in the areas of customer satisfaction and brand perception. Examples of engagement on an irregular basis are pretests of its advertising material whenever new marketing campaigns are prepared and before they are aired, in order to obtain consumer feedback about the understandability of the marketing messages and avoid potentially misleading communication.

The impact of marketing activities on the brand is assessed twice a year.

The Bank adheres to all relevant legislation and regulation regarding vulnerable customer groups (e.g. accessibility). There is no standardized process in place to collect further feedback from these customer groups. When feedback is required, such as in the case of preparing marketing communication aimed at young people, it engages with this vulnerable target group via market research agencies under the ESOMAR framework.

### **Engagement regarding non-discrimination**

Regarding the topic of non-discrimination, the Bank engages with its consumers and end-users by facilitating complaint management and uses various other channels across the organization to obtain their perspectives and feedback. For further details on complaint management can be found below in the chapter [S4-3: processes to remediate negative impacts, and channels for consumers and end-users to raise concerns](#).

### **Engagement regarding access to products and services**

As part of the Bank's ongoing due diligence process, a number of mechanisms ensure that the views of its customers are integrated into the decision-making processes regarding access to its products and services. The Bank actively gathers feedback

through different contact channels, including customer call centers, surveys, and focus groups, to identify and take measures to reduce potential barriers to accessing its products and services. Through its policies and direct engagement with its customers, the Bank aims to increase accessibility, inclusivity, and trust across its product and service offerings.

### **Engagement regarding responsible marketing practices**

As described under the topic of access to (quality) information above, the processes for engaging with consumers about respective impacts include market research and customer surveys, as well as any other instances of consumer contact with the Group.

Furthermore, when pretesting advertising material in the course of new marketing campaigns, the Bank gathers consumer feedback on the understandability of the information and messages provided. The consumer and end-user engagement process is implemented and ongoing within the Bank. It is not confined to a single department or timeframe but is integrated across multiple departments and utilizes various instruments to ensure comprehensive engagement. The process is split among several key areas:

- Customer Experience Department: continuously engages with consumers, use of various methodologies for customer journey mapping and maintaining CX measurement systems
- Complaint Management Department: channels providing an ongoing mechanism for consumers to voice their concerns, issues, or suggestions, allowing for real-time engagement and problem-solving
- Compliance department - Whistleblowing: this system offers a secure and confidential way for consumers to report any potential violations or concerns, ensuring ethical engagement and transparency.

### **S4-3: Processes to remediate negative impacts, and channels for consumers and end-users to raise concerns**

If the Bank has failed to fully meet customer expectations, consumers and end-users can address their complaints via various channels. Any negative impact identified via customer complaints channels is addressed to business units in line with customer complaints procedures. Complaints must be registered immediately in the Bank's complaint management system (CRM) and the person who registered the complaint must be notified of its receipt. The complaints are set automatically in analysis of the involved department(s) or employee(s) in order to determine whether the content of the complaint is objectively justified. The result of this analysis is immediately communicated to the person responsible for answering the customer. The answer is prepared based on the above-mentioned resolution and sent to the customer. In addition, the department responsible for complaints analysis must conduct an examination of the causes. The Management Board will be kept informed of the latest evolution in complaint management at regular intervals. Mitigation measures for the main complaint root causes will be determined by each affected department and followed up.

If the Bank identifies data privacy risks according to the specific categorization within GDPR, such as a data breach with a high level of risk to customers' personal data, the Bank has processes in place to proactively notify the data protection authority and affected customers (if applicable according to GDPR). These notifications should typically explain the nature of the risk, what personal data is affected, and the steps taken to address the issue. This allows the affected customers to take any necessary precautions (e.g. changing passwords or monitoring their accounts).

Customers can address complaints directly to the Bank via various channels including e-mail, letter, the website, mobile banking, social media, or personally and/or verbally as outlined on its website.

Within the Bank, complaints are seen as a valuable opportunity to identify potential process and product optimizations, and increase customer satisfaction.

Every complaint that is submitted is carefully documented within a high-end, market standard Customer Relationship Management system (CRM). Furthermore, the Bank publishes information on complaint management on its website to ensure that regular updates on changes to channels, procedures or legal foundations are provided. The overarching goal of complaint management is to ensure the swift and appropriate resolution of all customer complaints. At least once a year, the main reasons

for complaints are identified and analyzed by the business units and other relevant departments. Following this analysis, remedial actions are defined and continuously integrated.

The Bank ensures that customers are aware of official complaint channels by publishing corresponding information about complaint management and external authorities that might be addressed for mediation and escalation on its website. By constantly monitoring complaint data, including the respective customer interactions - complaint ratio, the Bank is assured that customers are properly informed / serviced.

#### **S4-4: Taking action on material impacts on consumers and end-users, approaches to managing material risks and pursuing material opportunities relating to consumers and end-users, and the effectiveness of these actions**

##### **Privacy, cyber security and resilience**

To prevent, mitigate and remediate the negative material impacts on consumers and/or end-users, and/or achieve positive material impacts for consumers and/or end-users, the Bank has implemented the following action steps, while it also strives to mitigate the associated risks via these steps:

- Development and implementation of policies
- Allocation of roles and responsibilities
- Conducting regular project and activity assessments (regular risk assessments to identify potential vulnerabilities in activities involving personal or customer data)
- Third-party evaluations (Vendor assessment when onboarding new suppliers into the organization)
- Implementation of suitable security technologies such as encryption, firewalls, data loss/leakage prevention systems and intrusion detection/prevention systems
- Access controls, restriction of data access, monitoring of access logs
- Clear communication with users about data handling
- Obtaining consent after providing information, if necessary
- Creating a comprehensive plan for responding to data breaches and other security breaches

Regarding information and cyber security, the technical and organizational security measures protect the confidentiality, integrity, and availability of information and information systems. Services provided feature high levels of security, reliability, and resilience. Measures and processes are defined, implemented, and tested to prevent, detect, and respond appropriately to security incidents to minimize impacts.

The Bank's actions include a prompt response (quick detection, containment, and reporting of data breaches in compliance with GDPR requirements) and long-term prevention (conducting root cause analysis, updating processes if necessary, additional employee training, and improving ongoing monitoring and auditing).

A high level of information security has a positive impact on customers and their free, secure, and uninterrupted use of the provided services. Thus, the Bank takes the following action steps:

- Compliance with GDPR requires appropriate technical and organizational measures and employee training sessions. Delivering e-learning GDPR training to employees, as well as workshop and practical guidance;
- Incident response plan, answering DSR requests within the regulatory time period ;
- Monitoring data breaches and data breach notification (adhering to the 72-hour notification requirement of GDPR, if applicable), as well as post-incident analysis;
- Transparency ( provides clear and transparent information on data processing activities through its privacy policy);
- Consumer control ( enables consumers to control their personal data through user-friendly tools for managing consent and privacy settings)
- Innovative services ( uses proven data protection practices to develop innovative financial services that prioritize consumer data protection and security)
- Building and maintaining consumer trust thanks to a strong commitment to data protection and security.

To raise awareness that information security is everyone's responsibility, training sessions, information campaigns, and events are offered, among other initiatives. In 2024, nearly 98% of employees completed the GDPR Implementation for Banking activities training.

The company has also allocated resources to promote awareness of the GDPR and to ensure transparency and effective oversight. The management structure includes:

- a Data Protection Officer
- a team in the Data Protection & Governance Department

This structured allocation of resources enables users to gain a clear understanding of how the company manages its impact on data protection and privacy, demonstrating a strong commitment to these important areas.

Effective organizational and technical security measures are essential for safeguarding financial integrity, building trust, and ensuring compliance with legal standards. To support this, the Bank emphasizes its robust commitment to information security. A security strategy, a framework of policies and standards, as well as technical and organizational security measures, are defined and implemented. Internal and external bodies regularly review the effectiveness of these measures, processes, and procedures. When necessary, they are adjusted based on state-of-the-art industry standards. The security policy outlines objectives and principles. As part of information security risk management, security risks are identified, documented, and appropriately addressed. A high security standard for the protection of information is intended to ensure longevity, competitiveness, and the provision of trustworthy, secure, and reliable services and products.

The information security management system, as defined by the security policy and the established comprehensive standard framework of the Bank, is regularly reviewed through internal and external audits and subject to a continuous improvement process. Among other things, identified weaknesses, improvements and external requirements are documented, measures and action plans with ambitious timelines are defined, and their implementation monitored. The degree of the security measures' implementation is regularly determined and reported centrally in the corresponding committees. Strategic goals are also defined and reviewed annually.

The Bank's information security management system that has been established and maintained addresses negative impacts and security risks to customers. The goal is to mitigate or avoid them by identifying, analysing and addressing information security risks. Thus, appropriate technical and organizational security measures are derived and the effectiveness of the measures implemented regularly reviewed.

The requirements defined in the Bank's security policy and in the respective standard framework apply for the entire group, and measures must be applied following a risk-based approach. In addition, contractual security requirements are agreed with third-party providers whose product or service offering could pose a security risk, and the providers are checked for an appropriate security level.

Adjustments to requirements in security standards are reported to and approved by the Standards and Procedures Committee. Changes to the security and standards are documented. The implementation status of the security requirements across the Bank is regularly checked and reported to the management.

The Bank tries to minimize the impact of an incident and learn from past incidents in order to prevent, detect more quickly, and handle such incidents more efficiently in the future.

No cases of human rights issues or incidents relating to information security that are associated with consumers and/or end-users are known to the information and cyber security department.

## Access to (quality) information

The Bank follows all the relevant legislation and regulation to prevent negative material impacts from its communication with and provision of information to consumers and end-users.

Promoting financial inclusion and financial literacy is a key component of the Bank's Sustainability strategy and CSR strategy. Positive impact on consumers includes enhancing product and service comparability, simplifying decision-making, educating customers, and reducing uncertainty and complaints. Well-informed customers are crucial for its business, which is why the Bank implements various initiatives to promote financial literacy across different age groups.

- Launched in 2018, Money Bistro is the initiative to share financial knowledge with the public in an accessible and engaging format. This resource is freely available to anyone interested in improving their financial literacy and developing healthier financial habits. The latest content update to our financial education initiatives was in 2023, when we launched the third season of Money Chat.
- In 2024, the Bank teamed up with Junior Achievement Romania for the 14th year to support financial education in Romanian schools. This initiative aims to shape responsible financial behavior from an early age, laying the foundations for a healthy financial culture for future generations.
- In 2024, the Bank partnered with ANAIS association, for an awareness campaign about economic violence, to support victims and promote an environment in which all people can achieve independence and financial security. The objective is that women in Romania can identify the signs of economic violence and then ask for help.

To raise awareness about financial literacy, the Bank uses the following communication strategies: ongoing media relations Press releases, Articles, Analysis, Interviews through proactive communication and prompt response to media inquiries, speaking opportunities at events, Participation of bank experts in industry podcasts, social media communication (the Bank's own social media channels).

The Bank prioritize transparency by clearly disclosing fees, rates, and terms, while offering real-time support via chatbots and live chat. Ana is the virtual consultant, available 24/7, both on the phone and in the chatbot, who helps the customer to find quick answers.

For the Bank, the instructions on providing information to customers set out requirements for all types of customer information based on the principle that it is honest, clear, understandable and not misleading. The instructions of the conflict of interest and complaint management policies describe measures that the Bank takes to provide or enable remedy in relation to an actual material impact. These measures include handling conflicts of interest and complaint management, including documenting and reporting complaints, training employees and regularly reviewing policies.

When providing investment advice, care is taken to ensure that the services correspond to the customer's investment objectives, and an appropriate evaluation and comparison method is established. If the appropriateness test is negative, the customer is warned. The qualifications of employees are documented and checked through a training account. These are ongoing processes within the organization.

## Non-discrimination and access to products and services

Non-discrimination and social inclusion are valid for all business lines from the Group. It takes various actions to avoid any negative impact that could reduce opportunities and lead to disadvantages or social exclusion for consumers. Regarding the accessibility of banking products and services, the Bank employs multiple distribution channels including Direct Sales Agents (DSA) who provide flexible loan product services at clients' preferred locations and times, complementing traditional channels like branches, call center, and website.

To help clients easily locate services, the Bank provides a comprehensive interactive map on website, displaying the locations of ATMs, Smart Cashboxes, branches, and Regional Corporate Centers, along with specific information about wheelchair accessibility. For customers unable to visit branches, the Bank implemented a process where branch staff can travel to the customer's location to provide banking services.

Financial literacy is an important prerequisite for access to products and services, and therefore social inclusion. The Bank offers various financial education programs that are not only intended for its consumers and end-users – read more in Access to (quality) information sub-chapter.

The Bank ensures equal access to financial services through innovative digital solutions that provide standardized, unbiased assistance to all clients. The Bank uses solutions like Raiffeisen Smart Finance o help its clients to set up financial plans:

- For Private Individuals customers (launched in 2023): the solution allows the branch employee to standardize the presentation of information regarding the products offered by the Bank. This tool offers to the possibility to simulate

the configuration of a financial plan, based on the information they provide, adapted to their objectives, needs, and wishes.

- For SME customers (launched in 2024): a solution which facilitates interactions with entrepreneurs, generating financial plans and aggregating integrated financial solutions for SME products. Customers have access to up-to-date financial information, convenient banking services and can choose the lending, insurance, or investment products they prefer. . The Bank's digital tools allow bank experts to present a range products and services, enabling customers to make informed decisions about their preferred financial solutions.

For physical accessibility, more than 90% of the branches and more than 60% of the ATMs are equipped with barrier-free/wheelchair access. To mitigate language barriers, the ATMs are multilingual.

As ensuring transparency is also very important, detailed information about products, costs and conditions are available on its websites.

The Bank offers comprehensive accessibility services for customers with visual, hearing, and speech impairments. For visually impaired clients, documents on current account packages can also be sent by email to clients with visual impairment to be read using dedicated apps. It provides documents in accessible formats compatible with text-to-audio conversion applications, allows designation of trusted representatives through power of attorney, and enables clients to bring personal assistants during banking procedures. The bank's website is designed to be compatible with dedicated "reading" apps, and product information, costs, and conditions can be easily accessed. Specifically for visually impaired clients, it has a dedicated workflow for Current account package enrollment, opening, and maintenance, with documents sent via email for use with specialized apps. For clients with hearing and speech impairments, the bank offers on-demand sign language interpreters available at branch locations to facilitate communication and support banking transactions.

In the Smart Mobile app, the Bank offers text-to-speech functionality through native Android and iOS operating systems.

The Group is taking action to prevent its website becoming another barrier to inclusion and access to products and services. In light of European Accessibility Act, a working group has been established. The objective of the working group on the European Accessibility Act is to use synergies in implementing the requirements. The Accessibility Act includes products and services provided not only through websites, mobile devices and mobile applications, but also services such as mobile banking. The Bank online and mobile banking platforms are in progress to be updated with accessibility features the Bank is actively working on implementing new UI elements. These improvements will enable comprehensive accessibility features including text resizing, contrast adjustments, and enhanced text-to-speech capabilities, making app navigation more intuitive for users with visual impairments.

The Bank took some other measures. In 2024, it strengthened its commitment to preventing discrimination by implementing mandatory anti-harassment training and guidelines for all employees, based on national legislation (Government Decision No. 970/2023). The comprehensive policy prohibits discrimination based on any criteria including race, gender, age, disability, or social category, explicitly covering interactions with customers and suppliers. To enhance inclusive practices, the Bank also conducted specialized training sessions, including a focused webinar on "Invisible Diversity | Neurodiversity," ensuring staff are equipped to serve all customers with understanding and respect.

These measures raise awareness of the topic of non-discrimination and aim to ensure that all consumers and end-users have access to products and services.

### **Responsible marketing practices**

The Bank follows all relevant legislation and regulation in order to prevent negative material impacts through its communication with and by providing information to consumers and end-users. All components of marketing communication - via media or direct communication are validated with the legal department (for the products requiring this also with Compliance), thus ensuring full compliance with the law's requirements. For cases in which an actual material impact could arise, the Bank has established a central complaint management function and adopted corresponding Group directives.

In compliance with legal regulations, measures are taken to prevent undue harassment of market participants through advertising activities. To avoid receiving unsolicited messages, consumers are required to explicitly consent to, for example, telephone calls or email advertising. This consent is documented and retained in accordance with legal timeframes. The measures implemented refer to ongoing processes.

S.A.I. Raiffeisen Asset Management SA's main objective is to help its clients to achieve their financial objectives by offering them the possibility of investing in 13 investment funds and participating in a voluntary pension fund, distributed only via the Bank. S.A.I. Raiffeisen Asset Management SA has a fair and transparent approach towards its clients and constantly publishes on its website updated information regarding the activities of the funds, their performance and any changes made to the constituent documents. The financial products S.A.I. Raiffeisen Asset Management SA manages are compliant with UCITS Directive and/or national regulations and are subject to permanent supervision by Financial Supervisory Authority. The funds specific risks, including ESG risks, as well as the legal/internal investment limits mentioned in the fund's prospectuses are constantly monitored through structured processes to ensure the product governance is compliant with the legal framework and business objectives.

#### **S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

<b>Aspect</b>	<b>Targets (Bank)</b>
Privacy	A streamlined data privacy framework that aims to ensure awareness on privacy matters, through staff trainings
Cybersecurity & Resilience	Further optimization of the Cyber Resilience posture to protect our customer data and enable secure business.
	Ensure compliance with industry regulations and mitigate new threats by implementing advanced detection and response systems.
	Fostering a culture of security awareness among employees.
Access to (quality) information	Maintain customer satisfaction in relation to the branch employees at high level - over 90*
	Increase by 400% number of customers who accessed personal financial plans connected to pension, insurance and investment by 2030 (vs start 2022)**
	Guarantee/safeguard the timely and accurate handling of all customer complaints
	At least annual identification of complaint root causes and analysis by business units, complaints management and other departments /review of complaint root cause mitigation measures
Responsible marketing practices	Minimizing all marketing communication related fines (target zero)
Non-discrimination	100% employees have completed training on preventing and combating discrimination and harassment annually
Access to products & services	The Bank has not yet established specific targets regarding access to products and services. Its current focus are implementation steps for EU Accessibility Act requirements

\* based on the Bank net satisfaction score with the following aspects being most appreciated - transparency of information, clarity of communication, attitude). (focus on: use of easily understandable language and clear explanations, completeness of information provided)

\*\*the data monitors unique customers for each type of product, overlaps between databases are possible, customers who own several products can be counted several times.

## Governance Information

### G1 Business Conduct

#### G1-1: Business conduct policies and corporate culture

##### Group Code of Conduct

In the Group Code of Conduct, Group culture of equal treatment and opportunities for all employees under the heading of Employee Relations is described. It focuses on areas such as fair employment practices, no discrimination or harassment and no violence. It also abstains from any forms of modern slavery and human trafficking. The Code of Conduct emphasizes the political neutrality of the Group. In line with its ethical principles and sponsorship policy, the Group does not make direct or indirect political contributions or provide cash or in-kind sponsorship to political parties or politicians. . Engaging in public affairs is restricted to authorized staff only. This includes presenting the Group's position or opinion during legislative or rule-making processes. To ensure awareness of the Code of Conduct principles, all employees must periodically complete an e-learning exercise on the Code of Conduct basics. In addition, all employees must sign a compliance statement in which they commit to observe the Code of Conduct, including the disclosure and regular updating of statements on conflicts of interest.

The Code of Conduct covers own operations of the Group as well as all the activities of its upstream and downstream business relationships. Every single staff member contributes to the Group's positive perception by meeting the high standards of the Code of Conduct.

Responsibility of the Code's content lies with the Compliance Directorate. The review and updating process is a continuously evolving working process in alignment with RBI's updating process.

The globally responsible approach is expected of all employees and managers, as well as partners and suppliers of the Group. The Group has committed to supporting elimination of any forms of human rights violations, to complying with European Convention on Human Rights, as well as with the Universal Declaration of Human Rights.

The Group Code of Conduct is regularly reviewed and adjusted to regulatory requirements and international standards in line with RBI updates. The final version is subject to the Board of Management review.

The Code of Conduct applies to all employees of the Group. It is published in Romanian, as well as in English on the RBI website and a link to it is provided on Bank's, Raiffeisen Leasing Romania IFN SA and S.A.I. Raiffeisen Asset Management SA websites. Moreover, every employee has to complete a training related to the Code of Conduct as a crucial part of the Group's corporate culture.

##### The Pillars for ethical business practices

The Code of Conduct defines six pillars of Group's standard for ethical business practices:

- Customer relations
- Investor relations
- Employee relations
- Compliance with laws and regulations
- Combating financial crime
- Social and environmental responsibility.

##### Social and environmental responsibility

It is the Group's understanding that its business may have a significant effect on each pillar of sustainability: in the economic sphere, in society and on the environment. This is reflected according to Bank's sustainability strategy as a responsible banker, a fair partner and an engaged corporate citizen. The Group therefore strives to achieve long term profitable business while avoiding, amongst other things, social and environmental harm by following proper due diligence practices. Furthermore, the Group wants to contribute to the improvement of environmental protection and social standards.

## Human rights

The Group is aware of specific industries (in particular nuclear, gambling and defence sectors) which due to their sensitivity have an impact on human rights. In respect of these industries specific internal framework and regulations were implemented.

The Group respects and supports the protection of human rights stipulated in the European Convention on Human Rights as well as the UN Universal Declaration of Human Rights. The Group refrains from being involved in business with products that are intended to be used for the abolition of demonstrations, in political unrest or in relation to other human rights violations. Any involvement in financing of controversial weapons deals (nuclear, biological, chemical weapons, blinding laser weapons, anti-personnel mines, cluster munitions, depleted uranium ammunition, incendiary weapons, non-detectable fragments, etc.) is strictly forbidden by the Group.

## Environmental protection

The Group's goal is to minimize the negative impact of its business activities on the environment and to reduce CO<sub>2</sub> emissions. The Group expects its service providers and suppliers to comply with these standards as well. Financing or participating in businesses or projects that pose a risk of significant sustainable environmental harm (e.g. destruction of rainforests, pollution of land, air, or water) is not in line with Group's business policy. Responsible employees must consider the potential negative environmental impacts and the resulting possible reputational damage to the Group in every decision regarding a business or project, especially when the Group is providing the financing.

## Diversity and inclusion

We believe that embracing diversity enriches perspectives, while also positively impacting business decisions and outcomes. The Group strives to create an inclusive workplace that establishes conditions and frameworks that are equally attractive and beneficial to all employees. Recognizing its function as a role model, the Group is actively committed to ensuring equal opportunities for all employees, regardless of age, gender, nationality, social origin, sexual orientation and identity, disability or religious beliefs, or any other criteria. The importance of diversity and inclusion is also demonstrated in the Group's Code of Conduct as well as in the Bank's Diversity Policy.

Furthermore, there are some additional aspects taken into consideration by the Group being part of Raiffeisen Bank International, which has committed itself to the following international initiatives and/or standards: United Nations Global Compact (UN GC), UNEP FI Principles for Responsible Banking (PRB), Science Based Targets Initiative (SBTi), Partnership for Carbon Accounting Financials (PCAF), Global Reporting Initiative (GRI), Taskforce on Climate-related Financial Disclosures Standards (TCFD), Diversity Charta, The Valuable 500 and finally to the United Nations Sustainable Development Goals (SDGs).

## Corporate governance

Corporate governance (CG) refers to the system of rules, practices and processes by which a corporation is directed and controlled. It involves balancing the interests of stakeholders, including shareholders, management and customers.

For the Bank, corporate governance includes regulations set by legislators and consideration of shareholders' interests. It describes the principles of guiding leadership under the Management Board and the Supervisory Board. Its aim is to have a responsible, transparent management framework that is focused on long-term value, supported by key principles that include efficient collaboration, safeguarding shareholder interests, and open communication.

The Group adheres to various legal provisions and its Code of Conduct for sustainable governance and social responsibility. The Group adheres to legal requirements for transparency in communication with stakeholders and therefore provides comprehensive and regularly updated information on business performance and governance on its website.

## Business conduct policies

### Anti-bribery & corruption

The Group has implemented an anti-Bribery & corruption policy:

The policy outlines the key duties and responsibilities of employees, compliance and management functions. It also defines bribery and corruption risks and describes the organizational anti-bribery and corruption standards that are applied in the Group.

Responsibility for the policy lies with the Group's entities Compliance function. Within the Bank, anti-corruption activity is managed by the Compliance Directorate, through the Anti-Fraud, Anti-Corruption, and Financial Services Investigations Department.

The scope of the policy applies to all entities within the Group.

The legal basis of the policy for the Group is guided by applicable or relevant laws, i.e., the Romanian Criminal Code.

The Group's Anti-Bribery & Corruption Policy is consistent with international legal instruments such as the United Nations Convention against Corruption, published in United Nations Treaty Series vol. 2349 no. 42146 and their guiding principles as well as further guidelines and governance principles that were taken into consideration as the UK Bribery Act and the US Foreign Corrupt Practices Act in the versions currently applicable.

ABC policy is regularly communicated via various channels (e.g. training, awareness messages, publication of core principles) to all internal stakeholders.

Functions that are most at risk in respect of corruption and bribery (e.g. Management Board, key function holder) undergo special awareness training on ABC.

The Anti-Bribery and Corruption Policy is made available to employees on the intranet page.

## Whistleblowing

The Group has implemented a whistleblowing policy. The key contents of the policy are the reporting by the organization's staff of code of conduct violations including market abuse, fraud, theft, embezzlement, bribery and corruption, which constitute the policies' material impacts and risks. To this end, the Group provides a whistleblowing platform which is operated by an external service provider that enables anonymous electronic reporting on intranet <https://rbi.whispli.com/lp/RaiffeisenBankRomania?locale=ro>.

Alternatively, employees and external stakeholders can use alternative channels (e.g., telephone, e-mail, in person, etc.) to report any violation of the Code of Conduct. The general objective of the policy is to bring the issues to the organization's attention. The Group considers reported violations as opportunities for improvement. Regarding monitoring, all violations that are detected are properly documented and followed up together with the operational management (first line of defense). The scope of the Group's whistleblowing policy covers all violations of the organization's code of conduct including, but not limited to, harassment or discrimination at work and all violations of law such as market abuse, fraud, embezzlement, etc.

The Management Board's Chief Risk Officer is the most senior level accountable for implementing the policy.

The Group regularly communicates the aforementioned mechanisms to its employees through Group's training programs.

Group's whistleblowing policy is based on a zero-tolerance approach (e.g. avoiding negative impacts such as harassment and discrimination). It ensures that all allegations brought to its attention are taken seriously and treated confidentially.

All reports are processed in accordance with internal compliance investigation mechanism on the basis of the following principles:

- All investigations are conducted by a dedicated team of carefully trained employees (investigators) following strict guidelines including the need to know principle;
- All investigations consider all evidence provided by stakeholders via whistleblowing or other channels and are conducted fully independently and without influence from internal or external sources.
- Findings and conclusions are presented to senior management (e.g. line managers; senior investigators) in order to align with further risk-appropriate actions.
- Investigation results and conclusions are properly documented in a limited-access and market-standard case management system (CMS).
- Investigators receive regular training by internal and external experts in various areas, including legal matters, investigation techniques and computer forensics.
- All investigations conducted within Raiffeisen Bank Romania follow Group-wide standards.

All reports are treated as confidential and specific whistleblowing protection measures are implemented in accordance with the EU Directive on the protection of persons who report breaches of Union law (Directive (EU) 2019/1937) and the Law no. 361/2022 regarding protection of whistleblower in public interest in Romania. All communication with whistleblowers is anonymous. Compliance uses secure and anonymous channels to regularly check on employees in case they face any retaliation from colleagues, line-managers or other personnel in relation to their whistleblowing activity. This safeguards the continuous monitoring of whistleblowing activities.

If violations are detected, the Group imposes appropriate risk-based actions including disciplinary ones, in accordance with the internal and external regulatory framework. The Group constantly analyses its rules and regulations to mitigate future risks as much as possible. The Bank reports on violations and breaches of the Code of Conduct to the Management Board and to the Supervisory Board on a regular basis (at least annually). The Group's entities also escalates specific material cases to the highest management bodies on an ad hoc basis. Furthermore, ABC-related incidents that come to the attention of the Group on channels other than whistleblowing-specific platforms are investigated independently.

In order to ensure that Group's employees are aware of the Group's whistleblowing mechanism, the process is embedded as an integral part of all internal training. Whistleblowing managers, receiving the reports, are experienced and skilled experts. They attend expert trainings, and participate in both external and internal conferences and seminars to continuously enhance their expertise. Furthermore, a broad information campaign was hosted in 2024 to further increase the awareness on whistleblowing among Bank's employees.

### **Training & raising awareness**

The Group considers consistent and targeted training to be a core element of establishing a compliant corporate culture and has established a Compliance Trainings Concept as part of the Group Compliance Governance Policy. The structured training program provides periodical trainings to all levels of expertise and on various business conduct related subject matters, including but not only Code of Conduct, anti-

bribery & corruption, fraud, conflict of interest, whistleblowing, anti-money laundering and counter terrorist financing.

All employees must complete annual compliance training on a minimum standard of compliance related topics to refresh their existing knowledge and to be informed about relevant changes and developments. All new employees must complete training courses on the topic of compliance. In particular, these cover aspects of preventing economic crime (especially combating money laundering and the financing of terrorism, international sanctions and embargoes, corruption and fraud prevention), market abuse and conflicts of interest, as well as learning about appropriate measures and rules concerning internal reporting obligations. Employees operating in risk sensitive areas receive additional regular targeted training that covers more in-depth knowledge. The frequency and target groups of advanced training is determined based on the compliance risks and incidents identified within the Group and changes to regulatory requirements.

The content of the training is structured into different modules and tailored to employees' specific roles and responsibilities, the compliance risk exposure, and the relevant regulatory requirements (e.g. customer relationship manager, areas of confidentiality). Updates to the training materials are triggered by new laws and regulations, products, and customer groups or when internal procedures change. The modules are also offered as interactive training with testing components to ensure the effectiveness of the training.

### **G1-2: Management of relationships with suppliers**

The Group is conscious of its position in the finance industry in Romania. The Bank has about 800 suppliers mainly in IT, facility management, consulting services and marketing. Thus, the company plays a significant role as a customer for businesses in these sectors in domestic markets. The Group has set itself the goal of exploiting the potential of its role as customer, by setting high environmental and social principles for a contractual relationship.

Being a fair partner for the Group's suppliers and demanding fairness towards their employees and suppliers as well as sustainable behaviour, not only safeguards operational banking activities. The Group also sees it as an opportunity to make a positive contribution to society and the environment. Bank's internal framework also underlines the commitment towards human rights in the supply chain by obligating its suppliers to conduct their business in line with the Bank's Supplier Code of Conduct. Together with its top suppliers the Bank works in partnership towards reducing emissions. The Bank both leverages its role as a key customer in its region and encourages business partners to follow a similar emissions reduction pathway.

Fair partnership with its suppliers also includes fair payment terms and the goal of complying with contractually agreed payment terms. Further information regarding payment practices is provided in chapter G1-6 Payment practices.

All suppliers must comply with the Supplier Code of Conduct and its principles, which, among other considerations, include compliance with the law, the prohibition of corruption and bribery, respect for the fundamental rights of employees and environmental regulations. The Supplier Code of Conduct is included on a Group-wide basis in contracts agreed with suppliers. In exceptional cases, supplier codes of conduct with comparable content are accepted as part of the contract. The principles defined in the Supplier Code of Conduct are to be regarded as a minimum level for environmental and social criteria, based on the

various regulations and directives with which the Bank has undertaken to comply. They are a material prerequisite to becoming a supplier to the Bank.

The Supplier Code of Conduct helps to ensure that suppliers adhere to important environmental and social criteria. Moreover, in the event of the principles being significantly breached, the Bank has the right to terminate the contractual relationship with the supplier. This approach highlights compliance with selected social and environmental standards as a fundamental requirement for working with us.

Further measures include taking into account the progress made in relation to sustainability in the selection of suppliers and the annual survey of the Bank's top suppliers. At least one ESG assessment will be carried out for each of the Bank's suppliers by 2030. Should the Bank identify a breach of the regulations by a supplier, it would assess the impact and define rectification measures. If the supplier failed to meet its obligations, the Bank would terminate the contractual relationship.

Bank's procurement is convinced that suppliers with a high level of commitment to their social and environmental business practices are stable partners and lower the risk of supplier failures, high workforce fluctuation and reputational damage, as well as ensuring compliance with regulatory provisions. Establishing a fair partnership with suppliers also fosters stability and provides a sound basis for the company's business operations.

### **G1-3: Prevention and detection of corruption and bribery**

The Group has adhere to Raiffeisen Bank International's s Anti-Bribery and Corruption (ABC) program which is continuously revised and a condensed overview is available to stakeholders on Raiffeisen Bank International's website homepage. The main objective within this program is to prevent, detect and address allegations of corruption and bribery via whistleblowing as outlined in the corresponding chapter.

Zero-tolerance. In line with the Code of Conduct, the Group follows a zero-tolerance policy, when it comes to unlawful or unethical business behaviour, such as bribery and corruption. It does not participate in any transaction in which there is a reason to believe that bribery and corruption is involved. The Group commits to proactively combating bribery and corruption in the environment in which it operates.

Tone from the top. To ensure the importance of its ABC program and that it is given the right level of attention, management functions / Management Boards of the Group units periodically promote and endorse relevant ABC activities and initiatives e.g., by taking part in internal / all staff communication initiatives, etc.

Policies and procedures. Group's ABC program builds upon clear and concise policies as well as other written internal procedures. Group's whistleblowing procedure allows internal and external stakeholders to address any allegations or incidents of corruption and bribery. and for them to be directly, safely and anonymously to be addressed and brought to the attention of Compliance for an independent investigation to be conducted. Based on the results of this investigation, risk-based actions are carefully executed to avoid future incidents. All ABC policies must be aligned with the relevant local legal or regulatory framework including international legal instruments such as the United Nations Convention Against Corruption.

To effectively manage its key procedures within the ABC framework, the Group takes a comprehensive approach that emphasizes the prevention and detection of, and response to, risks associated with bribery and corruption. The prevention procedures establish clear reporting obligations and enhance awareness through regular training programs, ensuring that all employees understand the potential risks and their responsibilities.

Detection mechanisms involve maintaining whistleblowing channels, conducting internal investigations and performing thorough business partner checks to proactively identify any irregularities. In addressing identified issues, the Group relies on its Code of Conduct and ethical principles to enforce compliance across the organization, fostering accountability and clearly communicating potential sanctions for policy violations. By integrating these procedures, the Group creates a robust ethical framework that significantly mitigates the risks associated with bribery and corruption. Finally, the investigation team acts separately and independently from the management team, while staying in close contact during the investigation procedures until a final report is submitted to senior management.

Training and awareness. All employees as well as management functions must undergo periodic ABC training activities and programs to establish and maintain a high level of awareness of bribery and corruption risks and to inform employees / management functions about their role and responsibilities within the ABC program. The training is provided via e-learning modules, and include tests, classroom trainings and additional awareness activities. The percentage of functions-at-risk covered by the Bank training programs is one hundred percent. Members of the administrative, management and supervisory bodies periodically receive ABC training as part of the Fit & Proper training program.

## Coverage of employees by anti-corruption training by employee categories

### G1-3 - Prevention and detection of corruption and bribery

#### Anti-corruption training coverage by employee categories

in headcount	2024			
	Group		Bank	
Supervisory Board	12	85.71 %	8	100.00 %
Management Board (first tier of management)	14	100.00 %	7	100.00 %
B-1 (second tier of management)	72	98.63 %	45	98.00 %
B-2 (third tier of management)	175	98.00 %	164	98.00 %
Other managers	312	100.00 %	310	100.00 %
Other employees	4,509	99.00 %	4,402	99.00 %

\*B-1 (Board-1) is the first level of management, after top management/ Directorate.

\*\*B-2 (Board-2) is the second level of management, after top management/ Directorate

Risk assessments. A holistic and periodic risk assessment of bribery and corruption risks for all relevant business lines and processes is a key pillar of Group's ABC program. This is in line with the methodology and standards of the Bank's Operational Risk Controlling Management Framework. The periodic risk assessment gives a comprehensive picture of those parts of the business lines and processes that might be most vulnerable to corrupt practices and whether the controls that are in place mitigate existing inherent risks. In addition, ad-hoc risk assessments may also be conducted, e.g., based on new or changed processes, products or if special incidents occur.

Controls. All Group's units perform regular controls to prevent, mitigate or detect bribery and corruption risks. Key control process that may be executed by first- (e.g., Human Resources, Procurement etc.) or second line of defence functions (e.g., Compliance) i.e. include, among other things:

- Conflict of interest disclosure and assessment process (mandatory reporting of gifts / invitations offered / received, professional activities, close relationships, economic interests etc.);
- Expense reimbursement controls (e.g., invoices for entertainment expenses are matched with related compliance disclosures);
- Know-your-customer checks / customer due diligence (e.g., before onboarding, based on specific triggers);
- Know-your-employee checks (e.g., before onboarding, based on specific triggers);
- Know-your-business partner checks (e.g., before onboarding, based on specific triggers);
- Compliance check / mandatory involvement of Compliance with regard to making contributions to external parties (e.g. Compliance checks sponsorships, donations, membership fees exceeding defined thresholds or based on specific triggers are checked by Compliance).

Cooperation and exchange. In line with Group's corporate values, strong cooperation and ongoing exchanges between all units facilitate experience sharing, allowing Groups ABC program to be constantly improved and enhanced. Key function holders (e.g. line managers, product-owners, etc.) and employees working in areas of confidentiality (e.g. Compliance, etc.) are involved in functions most at risk.

Management reporting. The Compliance functions within the Group have a direct reporting line to the management and periodically reports about incidents, gaps, or general developments with regards to the ABC program.

Accountability and sanctions. In line with Group's zero tolerance policy for bribery and corruption all employees and management functions are held accountable for their actions or potential omissions that lead to violations of Group's ABC program. In case of such events, internal sanctions and disciplinary measures - irrespective of any potential criminal law sanctions or other legal consequences - will be adequately applied and enforced.

## Anti-money-laundering and countering the financing of terrorism

The Bank has created a comprehensive framework for effectively combating money laundering, the financing of terrorism and managing related regulatory, reputational and other compliance risks that is in line with applicable legislation and considers international standards, such as the recommendations of the Financial Action Task Force (FATF), in all areas of responsibility. The anti-money laundering / countering the financing of terrorism framework is approved by the Management Board and ensures that money laundering risks are properly identified, evaluated and appropriately mitigated.

The framework is monitored on an ongoing basis. Reviews and updates can take place throughout the year but are conducted at least annually. It addresses all Bank employees and requires them to perform their duties in accordance with applicable laws, regulations as well as internal standards and procedures. Mismanagement of money laundering and counter-terrorism efforts can lead to an increase in criminal activities and jeopardize public safety and the economy. Conversely, effective management enhances public safety and satisfaction, and strengthens the economy. Effective management of money laundering and counter-terrorism efforts garners high public interest, positively impacting business relationships, while mitigating potential legal-, regulatory- and reputational-compliance risks. Addressing these topics strengthens RBI's reputation and fosters trust.

Key actions as result of the anti-money laundering / countering the financing of terrorism framework include:

- Appointment of a Compliance office at the Senior Management level
- Appointment of an anti-money laundering / countering the financing of terrorism officer that directly reports to management bodies
- Risk identification and classification of customers and products as well as risk-based due diligence obligations
- Systematic, continuous due diligence obligations for customers (including identifying politically exposed persons and beneficial owners), comprising enhanced due diligence for high-risk customers and management approval for certain types of customers (e.g., customers associated with politically exposed persons or certain high-risk countries)
- Targeted and additional requirements for companies domiciled in offshore territories
- Customer data, transaction and account monitoring, including coherence screening
- Reporting suspicions of money laundering/ terrorism financing to the AML officer / function
- Reporting money laundering/ terrorism financing suspicions to relevant authorities (e.g. an FIU);
- Reporting, exchanging information, and cooperating with relevant authorities (continuous action);
- Systematic controls and evaluations through the internal control system as well as internal and external audits
- Periodic and target-audience-based training and awareness programs (classroom-based, e-learning, micro-learnings etc.);
- Pro-active support of and contribution to further development of industry and legal standards through participation in e.g. working groups and initiatives on a national, European and international level (continuous action).

Given that combating money laundering is a constantly evolving process, the Bank recognizes the importance of continuously evaluating, developing, and adapting its anti-money laundering / countering the financing of terrorism framework . This contributes to Bank's target of conducting business only with reputable customers involved in legitimate business activities and whose funds derived from legitimate sources.

## **Tax compliance**

### **Tax Strategy**

Bank's tax strategy is shaped by statutory requirements, the Code of Conduct, and internal policies. Fulfilment of applicable tax obligations is a priority, and the Bank adheres to this principle across local jurisdiction and market.

### **Tax Concept**

Aligned with the Code of Conduct, the Bank rejects all forms of tax evasion and is committed to complying with laws and regulations against tax evasion and financial crimes . These principles guide all business activities and decisions. When developing new products, the Bank ensures compliance with applicable tax provisions.

The Bank adheres to tax transparency regulations and initiatives , such as Foreign Account Tax Compliance Act (FATCA), Common Reporting Standard (CRS), Transfer Pricing Documentation Act (VPDG), Directive on Administrative Cooperation - DAC 6 and Pillar 2.

The Bank's internal processes and controls, ensure compliance that it complies with both internal and external regulations identifying and prohibiting undesirable tax practices early . The primary goal is to meet tax obligations accurately and promptly, thus preventing compliance-related tax risks. The Code of Conduct as well as internal processes and procedures strive to ensure proper implementation.

## Tax Governance, Control, and Risk Management

Tax risks are identified, managed, and monitored through internal processes. Employee expertise on tax matters is maintained via conferences, workshops and external training, with some Tax Department employees subject to ongoing training obligations due to their qualifications as tax advisors. Training sessions and informative or awareness materials for internal departments are provided by Tax Department and external consultants.

Compliance with tax provisions and the control framework are monitored at multiple levels, reinforced by internal controls and external audits. External expert opinions are sought for clarification on certain complex issues.

Incidents or suspicions of tax misconduct can be reported internally or by third parties through established compliance communication channels including the whistleblowing platform.

Tax reporting embedded in the Annual Report undergoes external audits as part of the annual financial statement review.

## Stakeholder Engagement and Management of Tax Concerns

Important tax topics, tax audits and projects are presented to Management Board for acknowledgment or approval. External opinions are sought to ensure stakeholder perspectives are considered in decision-making and that tax risks are identified and documented.

Tax Department engages in open dialogue with tax authorities to foster tax compliance approach and consults with finance ministry regarding specific tax legislation. Active participation in tax committees of various institutions, such as the Romanian Banking Association, allows the Bank to anticipate and respond to trends in tax law promptly.

## G1-4: Incidents of corruption or bribery

All suspicions or bribery and corruption are processed in accordance with Group's internal compliance investigation and reporting mechanism. Adequate internal sanctions and disciplinary measures, i.e. dismissal of employees, were adequately applied and enforced, irrespective of criminal law sanctions and legal consequences.

**Group/Bank**

### G1-4 - Incidents of corruption or bribery

**2024**

Number of convictions for violation of anti-corruption and anti-bribery laws	-
Amount in € Million of fines for violation of anti-corruption and anti-bribery laws	-

## G1-6 Payment practices

The Group is conscious of its customer in its home market Romania and committed to be a fair partner for its suppliers. This includes providing fair payment terms and the goal of complying with contractual agreed payment terms.

The table below shows the payment terms for suppliers of the Group and the Bank, based on a representative sampling.

### G1-6 - Payment practices

	<b>Group</b>	<b>Bank</b>
Average time the entity takes to pay the invoice (in days)	15	24
Payments aligned with the standard payments term	93	70
Standard payment terms (in days)*	22	22
Legal proceedings currently outstanding for late payments	-	-

\*standard payment term vary between 14 days and 30 days for Group's entities and considering products/ services categories and are contractually set

The numbers above are based on invoices due between January and September 2024. Intra-group (RBI) invoices/payments have not been taken into consideration. The data shown includes external suppliers. There were no significant differences in payment terms or practices depending on the country, type and size of supplier or purchasing category.

Although the specific information about whether a supplier is a small- or medium-sized enterprise (SME) may not be readily available during the payment process, it is crucial for invoice requesters and approvers to consider the size and financial situation of the supplier. Employees are advised to expedite the processing of invoices from suppliers that are or could be SME. This proactive approach ensures that smaller suppliers, who may have tighter cash flow constraints, receive timely payments, thereby fostering positive business relationships and supporting the financial health of these enterprises.

The Group works consistently on optimizing its payment practices. The Bank, in particular, has the ambition to increase the percentage of payments aligned with the standard payment terms. Measures, such as training the employees participating in the payment process, improving the onboarding process to ensure suppliers provide the necessary data for payments, and assisting supporting the suppliers in issuing correct invoices and supporting documentation have already been implemented and are expected to lead to improvements. For any potential delays, specific Bank contacts are available.

## Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation- continued (templates 1-5)

### Template 1 - Assets for the calculation of GAR (CapEX)

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. 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 in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure

31 December 2024 GROUP		Total gross carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			
			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)						
in RON thousands				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>		-	-	-	-	-	-	-	-
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	12,974,556	9,544,150	1,533,340	146,131	235	418,263	-	-
2	Financial undertakings	494,945	86,464	2,024	-	216	729	-	-
3	Credit institutions	494,945	86,464	2,024	-	216	729	-	-
4	Loans and advances	64,326	20,610	482	-	51	174	-	-
5	Debt securities, including UoP	430,619	65,855	1,542	-	164	555	-	-
6	Equity instruments	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-

31 December 2024 GROUP		Total gross carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)						
			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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling				
in RON thousands													
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	2,846,313	1,739,786	1,385,184	-	19	417,535	-	-	-	-	-	-
21	Loans and advances	2,846,313	1,739,786	1,385,184	-	19	417,535	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
24	Households	7,755,678	7,707,904	146,131	146,131	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	7,726,898	7,707,904	146,131	146,131	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	28,780	-	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	1,877,620	9,995	-	-	-	-	-	-	-	-	-	-
29	Housing financing	1,877,620	9,995	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	24,307	-	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	39,023,637	-	-	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	23,071,357											
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	22,675,509											
35	Loans and advances	22,397,268											
36	of which loans collateralised by commercial immovable property	5,975,210											
37	of which building renovation loans	-											
38	Debt securities	214,967											
39	Equity instruments	63,274											
40	Non-EU country counterparties not subject to NFRD disclosure obligations	395,847											
41	Loans and advances	283,572											
42	Debt securities	-											
43	Equity instruments	112,275											
44	Derivatives	52,135											
45	On demand interbank loans	674,813											
46	Cash and cash-related assets	1,831,423											
47	Other categories of assets (e.g. Goodwill, commodities etc.)	13,393,909											
<b>48</b>	<b>Total GAR assets</b>	<b>52,022,500</b>	<b>9,544,150</b>	<b>1,533,340</b>	<b>146,131</b>	<b>235</b>	<b>418,263</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

31 December 2024 GROUP		Total gross carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)						
			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	Use of Proceeds	Of which transitional	Of which enabling	Of which	Use of Proceeds	Of which transitional	Of which enabling			
in RON thousands													
49	Assets not covered for GAR calculation	32,108,961											
50	Central governments and Supranational issuers	19,332,413											
51	Central banks exposure	12,218,613											
52	Trading book	557,935											
<b>53</b>	<b>Total assets</b>	<b>84,131,462</b>	<b>9,544,150</b>	<b>1,533,340</b>	<b>146,131</b>	<b>235</b>	<b>418,263</b>						
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>													
54	Financial guarantees	4,631,076	298,402	169,465	-	-	82,191						
55	Assets under management	5,666,813	-	-	-	-	-						
56	Of which debt securities	-	-	-	-	-	-						
57	Of which equity instruments	-	-	-	-	-	-						

31 December 2024

GROUP

in RON thousands

	Water and marine resources (WTR)				Circular economy (CE)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>	-	-	-	-	-	-	-	-
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	536	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-
20 Non-financial undertakings	-	-	-	-	536	-	-	-
21 Loans and advances	-	-	-	-	536	-	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-
24 Households	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-	-	-	-
33 Financial and Non-financial undertakings								

31 December 2024		Water and marine resources (WTR)				Circular economy (CE)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which environmentally sustainable (Taxonomy-aligned)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which environmentally sustainable (Taxonomy-aligned)	
GROUP									
in RON thousands									
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations								
35	Loans and advances								
36	of which loans collateralised by commercial immovable property								
37	of which building renovation loans								
38	Debt securities								
39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								
46	Cash and cash-related assets								
47	Other categories of assets (e.g. Goodwill, commodities etc.)								
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-	536	-	-	-
49	Assets not covered for GAR calculation	-	-	-	-	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-	-	-	-	-
51	Central banks exposure	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-
<b>53</b>	<b>Total assets</b>	-	-	-	-	536	-	-	-
	<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>								
54	Financial guarantees	-	-	-	-	36	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-

31 December 2024

GROUP

in RON thousands

	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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 Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>	-	-	-	-	-	-	-	-
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-	-
2 Financial undertakings	-	-	-	-	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-
20 Non-financial undertakings	-	-	-	-	-	-	-	-
21 Loans and advances	-	-	-	-	-	-	-	-
22 Debt securities, including UoP	-	-	-	-	-	-	-	-
23 Equity instruments	-	-	-	-	-	-	-	-
24 Households	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-
28 Local governments financing	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-	-	-	-
33 Financial and Non-financial undertakings								

31 December 2024 GROUP		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		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 Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
in RON thousands									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations								
35	Loans and advances								
36	of which loans collateralised by commercial immovable property								
37	of which building renovation loans								
38	Debt securities								
39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								
46	Cash and cash-related assets								
47	Other categories of assets (e.g. Goodwill, commodities etc.)								
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation	-	-	-	-	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-	-	-	-	-
51	Central banks exposure	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-
<b>53</b>	<b>Total assets</b>	-	-	-	-	-	-	-	-
	<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>								
54	Financial guarantees	1	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-

31 December 2024

TOTAL (CCM + CCA + WTR + CE + PPC + BIO)

GROUP

Of which towards taxonomy relevant sectors (Taxonomy-eligible)

Of which environmentally sustainable (Taxonomy-aligned)

in RON thousands

Of which Use of Proceeds

Of which transitional

Of which enabling

**GAR - Covered assets in both numerator and denominator**

	-	-	-	-	-
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	9,544,686	1,533,340	146,131	235	418,263
2 Financial undertakings	86,464	2,024	-	216	729
3 Credit institutions	86,464	2,024	-	216	729
4 Loans and advances	20,610	482	-	51	174
5 Debt securities, including UoP	65,855	1,542	-	164	555
6 Equity instruments	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-
8 of which investment firms	-	-	-	-	-
9 Loans and advances	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-
11 Equity instruments	-	-	-	-	-
12 of which management companies	-	-	-	-	-
13 Loans and advances	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-
15 Equity instruments	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-
17 Loans and advances	-	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-
19 Equity instruments	-	-	-	-	-
20 Non-financial undertakings	1,740,322	1,385,184	-	19	417,535
21 Loans and advances	1,740,322	1,385,184	-	19	417,535
22 Debt securities, including UoP	-	-	-	-	-
23 Equity instruments	-	-	-	-	-
24 Households	7,707,904	146,131	146,131	-	-
25 of which loans collateralised by residential immovable property	7,707,904	146,131	146,131	-	-
26 of which building renovation loans	-	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-
28 Local governments financing	9,995	-	-	-	-
29 Housing financing	9,995	-	-	-	-
30 Other local government financing	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-
33 Financial and Non-financial undertakings					

31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
GROUP		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
in RON thousands		Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional	Of which enabling	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations					
35	Loans and advances					
36	of which loans collateralised by commercial immovable property					
37	of which building renovation loans					
38	Debt securities					
39	Equity instruments					
40	Non-EU country counterparties not subject to NFRD disclosure obligations					
41	Loans and advances					
42	Debt securities					
43	Equity instruments					
44	Derivatives					
45	On demand interbank loans					
46	Cash and cash-related assets					
47	Other categories of assets (e.g. Goodwill, commodities etc.)					
<b>48</b>	<b>Total GAR assets</b>	<b>9,544,686</b>	<b>1,533,340</b>	<b>146,131</b>	<b>235</b>	<b>418,263</b>
49	Assets not covered for GAR calculation	-	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-	-
51	Central banks exposure	-	-	-	-	-
52	Trading book	-	-	-	-	-
<b>53</b>	<b>Total assets</b>	<b>9,544,686</b>	<b>1,533,340</b>	<b>146,131</b>	<b>235</b>	<b>418,263</b>
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>						
54	Financial guarantees	298,439	169,465	-	-	82,191
55	Assets under management	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-

31 December 2023 Bank		Total gross carrying amount	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)					
			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 Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
in RON thousands											
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,042,886	7,190,455	1,511,189	599,498	4,574	683,027	-	-	-	-
2	Financial undertakings	428,938	-	-	-	-	-	-	-	-	-
3	Credit institutions	428,938	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	428,938	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	3,022,608	1,020,929	911,691	-	4,574	683,027	-	-	-	-
21	Loans and advances	3,022,608	1,020,929	911,691	-	4,574	683,027	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	599,498	-	-	-	-	-	-
24	Households	8,210,510	6,169,526	599,498	599,498	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	8,210,510	6,169,526	599,498	599,498	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	1,380,830	-	-	-	-	-	-	-	-	-
	Housing financing	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	22,869,148	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	19,895,999	-	-	-	-	-	-	-	-	-

31 December 2023 Bank		Total gross carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
			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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling	
in RON thousands										
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	19,811,323	-	-	-	-	-	-	-	-
35	Loans and advances	19,811,323	-	-	-	-	-	-	-	-
36	of which loans collateralised by commercial immovable property	6,226,857	-	-	-	-	-	-	-	-
37	of which building renovation loans	-	-	-	-	-	-	-	-	-
38	Debt securities	229,031	-	-	-	-	-	-	-	-
39	Equity instruments	181,961	-	-	-	-	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	421,316	-	-	-	-	-	-	-	-
41	Loans and advances	1,049	-	-	-	-	-	-	-	-
42	Debt securities	-	-	-	-	-	-	-	-	-
43	Equity instruments	84,466	-	-	-	-	-	-	-	-
44	Derivatives	59,394	-	-	-	-	-	-	-	-
45	On demand interbank loans	258,624	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	1,863,555	-	-	-	-	-	-	-	-
47	Other categories of assets (e.g. Goodwill, commodities etc.)	791,575	-	-	-	-	-	-	-	-
<b>48</b>	<b>Total GAR assets</b>	<b>35,912,034</b>	<b>7,190,455</b>	<b>1,511,189</b>	<b>599,498</b>	-	-	-	-	-
49	Assets not covered for GAR calculation	34,245,625	-	-	-	-	-	-	-	-
50	Central governments and Supranational issuers	12,084,421	-	-	-	-	-	-	-	-
51	Central banks exposure	11,939,260	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-
<b>53</b>	<b>Total assets</b>	<b>70,157,659</b>	<b>7,190,455</b>	<b>1,511,189</b>	<b>599,498</b>	-	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>										
54	Financial guarantees	4,888,655	291,040	240,966	-	4,988	101,225	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-

31 December 2023		Water and marine resources (WTR)		Circular economy (CE)	
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
Bank		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)	
in RON thousands		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>					
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-
2	Financial undertakings	-	-	-	-
3	Credit institutions	-	-	-	-
4	Loans and advances	-	-	-	-
5	Debt securities, including UoP	-	-	-	-
6	Equity instruments	-	-	-	-
7	Other financial corporations	-	-	-	-
8	of which investment firms	-	-	-	-
9	Loans and advances	-	-	-	-
10	Debt securities, including UoP	-	-	-	-
11	Equity instruments	-	-	-	-
12	of which management companies	-	-	-	-
13	Loans and advances	-	-	-	-
14	Debt securities, including UoP	-	-	-	-
15	Equity instruments	-	-	-	-
16	of which insurance undertakings	-	-	-	-
17	Loans and advances	-	-	-	-
18	Debt securities, including UoP	-	-	-	-
19	Equity instruments	-	-	-	-
20	Non-financial undertakings	-	-	-	-
21	Loans and advances	-	-	-	-
22	Debt securities, including UoP	-	-	-	-
23	Equity instruments	-	-	-	-
24	Households	-	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-
26	of which building renovation loans	-	-	-	-
27	of which motor vehicle loans	-	-	-	-
28	Local governments financing	-	-	-	-
	Housing financing	-	-	-	-
30	Other local government financing	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-
33	Financial and Non-financial undertakings	-	-	-	-

31 December 2023		Water and marine resources (WTR)				Circular economy (CE)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which environmentally sustainable (Taxonomy-aligned)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which environmentally sustainable (Taxonomy-aligned)	
Bank									
in RON thousands									
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	-	-	-	-	-	-	-	-
35	Loans and advances	-	-	-	-	-	-	-	-
36	of which loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-
37	of which building renovation loans	-	-	-	-	-	-	-	-
38	Debt securities	-	-	-	-	-	-	-	-
39	Equity instruments	-	-	-	-	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	-	-	-	-	-	-	-	-
41	Loans and advances	-	-	-	-	-	-	-	-
42	Debt securities	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-
44	Derivatives	-	-	-	-	-	-	-	-
45	On demand interbank loans	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-
47	Other categories of assets (e.g. Goodwill, commodities etc.)	-	-	-	-	-	-	-	-
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation	-	-	-	-	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-	-	-	-	-
51	Central banks exposure	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-
<b>53</b>	<b>Total assets</b>	-	-	-	-	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>									
54	Financial guarantees	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-

31 December 2023		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
Bank		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)	
in RON thousands		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>					
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-
2	Financial undertakings	-	-	-	-
3	Credit institutions	-	-	-	-
4	Loans and advances	-	-	-	-
5	Debt securities, including UoP	-	-	-	-
6	Equity instruments	-	-	-	-
7	Other financial corporations	-	-	-	-
8	of which investment firms	-	-	-	-
9	Loans and advances	-	-	-	-
10	Debt securities, including UoP	-	-	-	-
11	Equity instruments	-	-	-	-
12	of which management companies	-	-	-	-
13	Loans and advances	-	-	-	-
14	Debt securities, including UoP	-	-	-	-
15	Equity instruments	-	-	-	-
16	of which insurance undertakings	-	-	-	-
17	Loans and advances	-	-	-	-
18	Debt securities, including UoP	-	-	-	-
19	Equity instruments	-	-	-	-
20	Non-financial undertakings	-	-	-	-
21	Loans and advances	-	-	-	-
22	Debt securities, including UoP	-	-	-	-
23	Equity instruments	-	-	-	-
24	Households	-	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-
26	of which building renovation loans	-	-	-	-
27	of which motor vehicle loans	-	-	-	-
28	Local governments financing	-	-	-	-
	Housing financing	-	-	-	-
30	Other local government financing	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-
33	Financial and Non-financial undertakings	-	-	-	-

31 December 2023		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which environmentally sustainable (Taxonomy-aligned)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which environmentally sustainable (Taxonomy-aligned)	
Bank									
in RON thousands									
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	-	-	-	-	-	-	-	-
35	Loans and advances	-	-	-	-	-	-	-	-
36	of which loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-
37	of which building renovation loans	-	-	-	-	-	-	-	-
38	Debt securities	-	-	-	-	-	-	-	-
39	Equity instruments	-	-	-	-	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	-	-	-	-	-	-	-	-
41	Loans and advances	-	-	-	-	-	-	-	-
42	Debt securities	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-
44	Derivatives	-	-	-	-	-	-	-	-
45	On demand interbank loans	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	-	-	-	-	-	-	-	-
47	Other categories of assets (e.g. Goodwill, commodities etc.)	-	-	-	-	-	-	-	-
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation	-	-	-	-	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-	-	-	-	-
51	Central banks exposure	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-
<b>53</b>	<b>Total assets</b>	-	-	-	-	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>									
54	Financial guarantees	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-

31 December 2023		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
Bank		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
in RON thousands		Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	7,190,455	1,511,189	599,498	4,574	683,027
2	Financial undertakings	-	-	-	-	-
3	Credit institutions	-	-	-	-	-
4	Loans and advances	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-
6	Equity instruments	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-
8	of which investment firms	-	-	-	-	-
9	Loans and advances	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which management companies	-	-	-	-	-
13	Loans and advances	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-
17	Loans and advances	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	Non-financial undertakings	1,020,929	911,691	-	4,574	683,027
21	Loans and advances	1,020,929	911,691	-	4,574	683,027
22	Debt securities, including UoP	-	-	-	-	-
23	Equity instruments	-	-	-	-	-
24	Households	6,169,526	599,498	599,498	-	-
25	of which loans collateralised by residential immovable property	6,169,526	599,498	599,498	-	-
26	of which building renovation loans	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-
28	Local governments financing	-	-	-	-	-
	Housing financing	-	-	-	-	-
30	Other local government financing	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-
33	Financial and Non-financial undertakings	-	-	-	-	-

31 December 2023		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
Bank		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
in RON thousands		Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	-	-	-	-
35	Loans and advances	-	-	-	-
36	of which loans collateralised by commercial immovable property	-	-	-	-
37	of which building renovation loans	-	-	-	-
38	Debt securities	-	-	-	-
39	Equity instruments	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	-	-	-	-
41	Loans and advances	-	-	-	-
42	Debt securities	-	-	-	-
43	Equity instruments	-	-	-	-
44	Derivatives	-	-	-	-
45	On demand interbank loans	-	-	-	-
46	Cash and cash-related assets	-	-	-	-
47	Other categories of assets (e.g. Goodwill, commodities etc.)	-	-	-	-
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-
49	Assets not covered for GAR calculation	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-
51	Central banks exposure	-	-	-	-
52	Trading book	-	-	-	-
<b>53</b>	<b>Total assets</b>	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>					
54	Financial guarantees	291,040	240,966	-	4,988
55	Assets under management	-	-	-	-
56	Of which debt securities	-	-	-	-
57	Of which equity instruments	-	-	-	-

**Template 1 - Assets for the calculation of GAR (turnover)**

31 December 2024 GROUP		Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)								
in RON thousands											
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	12,974,556	8,065,510	251,717	146,131	324	68,989	-	-	-	-
2	Financial undertakings	494,945	85,466	1,430	-	324	432	-	-	-	-
3	Credit institutions	494,945	85,466	1,430	-	324	432	-	-	-	-
4	Loans and advances	64,326	20,372	341	-	77	103	-	-	-	-
5	Debt securities, including UoP	430,619	65,094	1,089	-	247	329	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	2,846,313	262,145	104,155	-	-	68,557	-	-	-	-
21	Loans and advances	2,846,313	262,145	104,155	-	-	68,557	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-
24	Households	7,755,678	7,707,904	146,131	146,131	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	7,726,898	7,707,904	146,131	146,131	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	28,780	-	-	-	-	-	-	-	-	-
28	Local governments financing	1,877,620	9,995	-	-	-	-	-	-	-	-
29	Housing financing	1,877,620	9,995	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-

31 December 2024 GROUP		Total [gross] carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
			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	Use of Proceeds	Of which transitional	Of which enabling	Of which	Use of Proceeds	Of which enabling	Of which enabling	
in RON thousands											
31	Collateral obtained by taking possession: residential and commercial immovable properties	24,307	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	39,023,637	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	23,071,357									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	22,675,509									
35	Loans and advances	22,397,268									
36	of which loans collateralised by commercial immovable property	5,975,210									
37	of which building renovation loans	-									
38	Debt securities	214,967									
39	Equity instruments	63,274									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	395,847									
41	Loans and advances	283,572									
42	Debt securities	-									
43	Equity instruments	112,275									
44	Derivatives	52,135									
45	On demand interbank loans	674,813									
46	Cash and cash-related assets	1,831,423									
47	Other categories of assets (e.g. Goodwill, commodities etc.)	13,393,909									
<b>48</b>	<b>Total GAR assets</b>	<b>52,022,500</b>	<b>8,065,510</b>	<b>251,717</b>	<b>146,131</b>	<b>324</b>	<b>68,989</b>	-	-	-	-
49	Assets not covered for GAR calculation	32,108,961									
50	Central governments and Supranational issuers	19,332,413									
51	Central banks exposure	12,218,613									
52	Trading book	557,935									
<b>53</b>	<b>Total assets</b>	<b>84,131,462</b>	<b>8,065,510</b>	<b>251,717</b>	<b>146,131</b>	<b>324</b>	<b>68,989</b>	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>											
54	Financial guarantees	4,631,076	230,836	66,908	-	-	34,653	-	-	-	-
55	Assets under management	5,666,813	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-

31 December 2024

GROUPE

in RON thousands

**GAR - Covered assets in both numerator and denominator**

	Water and marine resources (WTR)				Circular economy (CE)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
	Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	2,599	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	2,599	-	-	-
21	Loans and advances	-	-	-	-	2,599	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-
24	Households	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings								

31 December 2024 GROUP		Water and marine resources (WTR)				Circular economy (CE)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
in RON thousands									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations								
35	Loans and advances								
36	of which loans collateralised by commercial immovable property								
37	of which building renovation loans								
38	Debt securities								
39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								
46	Cash and cash-related assets								
47	Other categories of assets (e.g. Goodwill, commodities etc.)								
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-	<b>2,599</b>	-	-	-
49	Assets not covered for GAR calculation								
50	Central governments and Supranational issuers								
51	Central banks exposure								
52	Trading book								
<b>53</b>	<b>Total assets</b>	-	-	-	-	<b>2,599</b>	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>									
54	Financial guarantees	1	-	-	-	81	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-

31 December 2024

GROUP

in RON thousands

	Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	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 Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>								
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-
2	Financial undertakings	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-
20	Non-financial undertakings	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-
24	Households	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-
28	Local governments financing	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings							

31 December 2024		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
GROUP		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
in RON thousands									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations								
35	Loans and advances								
36	of which loans collateralised by commercial immovable property								
37	of which building renovation loans								
38	Debt securities								
39	Equity instruments								
40	Non-EU country counterparties not subject to NFRD disclosure obligations								
41	Loans and advances								
42	Debt securities								
43	Equity instruments								
44	Derivatives								
45	On demand interbank loans								
46	Cash and cash-related assets								
47	Other categories of assets (e.g. Goodwill, commodities etc.)								
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation								
50	Central governments and Supranational issuers								
51	Central banks exposure								
52	Trading book								
<b>53</b>	<b>Total assets</b>	-	-	-	-	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>									
54	Financial guarantees	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-

31 December 2024

TOTAL (CCM + CCA + WTR + CE + PPC + BIO)

GROUP

Of which towards taxonomy relevant sectors (Taxonomy-eligible)

Of which environmentally sustainable (Taxonomy-aligned)

in RON thousands

Of which Use of Proceeds

Of which transitional

Of which enabling

**GAR - Covered assets in both numerator and denominator**

1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8,068,109	251,717	146,131	324	68,989
2	Financial undertakings	85,466	1,430	-	324	432
3	Credit institutions	85,466	1,430	-	324	432
4	Loans and advances	20,372	341	-	77	103
5	Debt securities, including UoP	65,094	1,089	-	247	329
6	Equity instruments	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-
8	of which investment firms	-	-	-	-	-
9	Loans and advances	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which management companies	-	-	-	-	-
13	Loans and advances	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-
17	Loans and advances	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	Non-financial undertakings	264,743	104,155	-	-	68,557
21	Loans and advances	264,743	104,155	-	-	68,557
22	Debt securities, including UoP	-	-	-	-	-
23	Equity instruments	-	-	-	-	-
24	Households	7,707,904	146,131	146,131	-	-
25	of which loans collateralised by residential immovable property	7,707,904	146,131	146,131	-	-
26	of which building renovation loans	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-
28	Local governments financing	9,995	-	-	-	-
29	Housing financing	9,995	-	-	-	-
30	Other local government financing	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-
33	Financial and Non-financial undertakings					

31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
GROUP		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
in RON thousands		Of which environmentally sustainable (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional	Of which enabling	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations					
35	Loans and advances					
36	of which loans collateralised by commercial immovable property					
37	of which building renovation loans					
38	Debt securities					
39	Equity instruments					
40	Non-EU country counterparties not subject to NFRD disclosure obligations					
41	Loans and advances					
42	Debt securities					
43	Equity instruments					
44	Derivatives					
45	On demand interbank loans					
46	Cash and cash-related assets					
47	Other categories of assets (e.g. Goodwill, commodities etc.)					
<b>48</b>	<b>Total GAR assets</b>	<b>8,068,109</b>	<b>251,717</b>	<b>146,131</b>	<b>324</b>	<b>68,989</b>
49	Assets not covered for GAR calculation					
50	Central governments and Supranational issuers					
51	Central banks exposure					
52	Trading book					
<b>53</b>	<b>Total assets</b>	<b>8,068,109</b>	<b>251,717</b>	<b>146,131</b>	<b>324</b>	<b>68,989</b>
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>						
54	Financial guarantees	230,918	66,908	-	-	34,653
55	Assets under management	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-

31 December 2023

BANK

in RON thousands

	Total [gross] carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			
		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 Use of Proceeds		Of which transitional		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	13,042,886	6,429,085	758,801	599,498	-	-	-	-	-	-
2	Financial undertakings	428,938	12,609	-	-	-	-	-	-	-	-
3	Credit institutions	428,938	12,609	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	428,938	12,609	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	3,022,608	246,951	159,303	-	-	142,830	-	-	-	-
21	Loans and advances	3,022,608	246,951	159,303	-	-	142,830	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	599,498	-	-	-	-	-	-
24	Households	8,210,510	6,169,526	599,498	599,498	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	8,210,510	6,169,526	599,498	599,498	-	-	-	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-
28	Local governments financing	1,380,830	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	22,869,148	-	-	-	-	-	-	-	-	-
33	Financial and Non-financial undertakings	19,895,999	-	-	-	-	-	-	-	-	-

31 December 2023 BANK		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
			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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		
in RON thousands											
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	19,811,323	-	-	-	-	-	-	-	-	-
35	Loans and advances	19,811,323	-	-	-	-	-	-	-	-	-
36	of which loans collateralised by commercial immovable property	6,226,857	-	-	-	-	-	-	-	-	-
37	of which building renovation loans	-	-	-	-	-	-	-	-	-	-
38	Debt securities	229,031	-	-	-	-	-	-	-	-	-
39	Equity instruments	181,961	-	-	-	-	-	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	421,316	-	-	-	-	-	-	-	-	-
41	Loans and advances	1,049	-	-	-	-	-	-	-	-	-
42	Debt securities	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	84,466	-	-	-	-	-	-	-	-	-
44	Derivatives	59,394	-	-	-	-	-	-	-	-	-
45	On demand interbank loans	258,624	-	-	-	-	-	-	-	-	-
46	Cash and cash-related assets	1,863,555	-	-	-	-	-	-	-	-	-
47	Other categories of assets (e.g. Goodwill, commodities etc.)	791,575	-	-	-	-	-	-	-	-	-
<b>48</b>	<b>Total GAR assets</b>	<b>35,912,034</b>	<b>6,429,085</b>	<b>758,801</b>	<b>599,498</b>	-	-	-	-	-	-
49	Assets not covered for GAR calculation	34,245,625	0	0	0	0	0	0	-	-	-
50	Central governments and Supranational issuers	12,084,421	0	0	0	0	0	0	-	-	-
51	Central banks exposure	11,939,260	0	0	0	0	0	0	-	-	-
52	Trading book	-	0	0	0	0	0	0	-	-	-
<b>53</b>	<b>Total assets</b>	<b>70,157,659</b>	<b>6,429,085</b>	<b>758,801</b>	<b>599,498</b>	-	-	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>											
54	Financial guarantees	4,888,655	100,676	61,504	-	-	40,227	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-

31 December 2023	Water and marine resources (WTR)				Circular economy (CE)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
	Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>BANK</b>								
<b>in RON thousands</b>								
<b>GAR - Covered assets in both numerator and denominator</b>								
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation								
2 Financial undertakings								
3 Credit institutions								
4 Loans and advances								
5 Debt securities, including UoP								
6 Equity instruments								
7 Other financial corporations								
8 of which investment firms								
9 Loans and advances								
10 Debt securities, including UoP								
11 Equity instruments								
12 of which management companies								
13 Loans and advances								
14 Debt securities, including UoP								
15 Equity instruments								
16 of which insurance undertakings								
17 Loans and advances								
18 Debt securities, including UoP								
19 Equity instruments								
20 Non-financial undertakings								
21 Loans and advances								
22 Debt securities, including UoP								
23 Equity instruments								
24 Households								
25 of which loans collateralised by residential immovable property								
26 of which building renovation loans								
27 of which motor vehicle loans								
28 Local governments financing								
29 Housing financing								
30 Other local government financing								
31 Collateral obtained by taking possession: residential and commercial immovable properties								
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)								
33 Financial and Non-financial undertakings								

31 December 2023		Water and marine resources (WTR)		Circular economy (CE)	
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
BANK		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)	
in RON thousands		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations				
35	Loans and advances				
36	of which loans collateralised by commercial immovable property				
37	of which building renovation loans				
38	Debt securities				
39	Equity instruments				
40	Non-EU country counterparties not subject to NFRD disclosure obligations				
41	Loans and advances				
42	Debt securities				
43	Equity instruments				
44	Derivatives				
45	On demand interbank loans				
46	Cash and cash-related assets				
47	Other categories of assets (e.g. Goodwill, commodities etc.)				
<b>48</b>	<b>Total GAR assets</b>				
49	Assets not covered for GAR calculation				
50	Central governments and Supranational issuers				
51	Central banks exposure				
52	Trading book				
<b>53</b>	<b>Total assets</b>				
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>					
54	Financial guarantees				
55	Assets under management				
56	Of which debt securities				
57	Of which equity instruments				

31 December 2023	Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
	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 Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling
<b>BANK</b>				
<b>in RON thousands</b>				
<b>GAR - Covered assets in both numerator and denominator</b>				
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation				
2 Financial undertakings				
3 Credit institutions				
4 Loans and advances				
5 Debt securities, including UoP				
6 Equity instruments				
7 Other financial corporations				
8 of which investment firms				
9 Loans and advances				
10 Debt securities, including UoP				
11 Equity instruments				
12 of which management companies				
13 Loans and advances				
14 Debt securities, including UoP				
15 Equity instruments				
16 of which insurance undertakings				
17 Loans and advances				
18 Debt securities, including UoP				
19 Equity instruments				
20 Non-financial undertakings				
21 Loans and advances				
22 Debt securities, including UoP				
23 Equity instruments				
24 Households				
25 of which loans collateralised by residential immovable property				
26 of which building renovation loans				
27 of which motor vehicle loans				
28 Local governments financing				
29 Housing financing				
30 Other local government financing				
31 Collateral obtained by taking possession: residential and commercial immovable properties				
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)				
33 Financial and Non-financial undertakings				

31 December 2023		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)		Of which towards taxonomy relevant sectors (Taxonomy-eligible)	
BANK		Of which environmentally sustainable (Taxonomy-aligned)		Of which environmentally sustainable (Taxonomy-aligned)	
in RON thousands		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations				
35	Loans and advances				
36	of which loans collateralised by commercial immovable property				
37	of which building renovation loans				
38	Debt securities				
39	Equity instruments				
40	Non-EU country counterparties not subject to NFRD disclosure obligations				
41	Loans and advances				
42	Debt securities				
43	Equity instruments				
44	Derivatives				
45	On demand interbank loans				
46	Cash and cash-related assets				
47	Other categories of assets (e.g. Goodwill, commodities etc.)				
<b>48</b>	<b>Total GAR assets</b>				
49	Assets not covered for GAR calculation				
50	Central governments and Supranational issuers				
51	Central banks exposure				
52	Trading book				
<b>53</b>	<b>Total assets</b>				
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>					
54	Financial guarantees				
55	Assets under management				
56	Of which debt securities				
57	Of which equity instruments				

31 December 2023

TOTAL (CCM + CCA + WTR + CE + PPC + BIO)

BANK

Of which towards taxonomy relevant sectors (Taxonomy-eligible)

Of which environmentally sustainable (Taxonomy-aligned)

in RON thousands

Of which Use of Proceeds

Of which transitional

Of which enabling

**GAR - Covered assets in both numerator and denominator**

1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6,429,085	758,801	599,498	-	-
2	Financial undertakings	12,609	-	-	-	-
3	Credit institutions	12,609	-	-	-	-
4	Loans and advances	-	-	-	-	-
5	Debt securities, including UoP	12,609	-	-	-	-
6	Equity instruments	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-
8	of which investment firms	-	-	-	-	-
9	Loans and advances	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which management companies	-	-	-	-	-
13	Loans and advances	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-
17	Loans and advances	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	Non-financial undertakings	246,951	159,303	-	-	142,830
21	Loans and advances	246,951	159,303	-	-	-
22	Debt securities, including UoP	-	-	-	-	-
23	Equity instruments	-	-	-	-	-
24	Households	6,169,526	599,498	599,498	-	-
25	of which loans collateralised by residential immovable property	6,169,526	599,498	599,498	-	-
26	of which building renovation loans	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-
28	Local governments financing	-	-	-	-	-
29	Housing financing	-	-	-	-	-
30	Other local government financing	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	-	-	-	-	-
33	Financial and Non-financial undertakings	-	-	-	-	-

31 December 2023		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
BANK		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
in RON thousands		Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which transitional	Of which enabling
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	-	-	-	-
35	Loans and advances	-	-	-	-
36	of which loans collateralised by commercial immovable property	-	-	-	-
37	of which building renovation loans	-	-	-	-
38	Debt securities	-	-	-	-
39	Equity instruments	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	-	-	-	-
41	Loans and advances	-	-	-	-
42	Debt securities	-	-	-	-
43	Equity instruments	-	-	-	-
44	Derivatives	-	-	-	-
45	On demand interbank loans	-	-	-	-
46	Cash and cash-related assets	-	-	-	-
47	Other categories of assets (e.g. Goodwill, commodities etc.)	-	-	-	-
<b>48</b>	<b>Total GAR assets</b>	-	-	-	-
49	Assets not covered for GAR calculation	-	-	-	-
50	Central governments and Supranational issuers	-	-	-	-
51	Central banks exposure	-	-	-	-
52	Trading book	-	-	-	-
<b>53</b>	<b>Total assets</b>	-	-	-	-
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>					
54	Financial guarantees	100,676	61,504	-	40,227
55	Assets under management	-	-	-	-
56	Of which debt securities	-	-	-	-
57	Of which equity instruments	-	-	-	-

**Template 2 - GAR sector information (CapEx)**

31 December 2024 GROUP Breakdown by sector - NACE 4 digits level (code and label) in RON thousands	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
	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
	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCA)	Of which environmentally sustainable (CCA)
4950 - Transport via pipeline	508,644	503,710	-	-
3522 - Distribution of gaseous fuels through mains	330,116	330,116	-	-
1920 - Manufacture of refined petroleum products	197,973	56,379	-	-
3523 - Trade of gas through mains	186,182	186,182	-	-
3514 - Trade of electricity	151,550	146,539	-	-
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	141,466	132,108	-	-
3821 - Treatment and disposal of non-hazardous waste	63,746	-	-	-
7022 - Business and other management consultancy activities	52,121	-	-	-
0620 - Extraction of natural gas	38,802	-	-	-
0610 - Extraction of crude petroleum	33,101	8,399	-	-
3513 - Distribution of electricity	21,426	20,717	-	-
4636 - Wholesale of sugar and chocolate and sugar confectionery	11,265	-	-	-
2910 - Manufacture of motor vehicles	3,119	813	-	-
4673 - Wholesale of wood, construction materials and sanitary equipment	258	219	-	-
4120 - Construction of residential and non-residential buildings	15	3	-	-

31 December 2024

GROUP

Breakdown by sector - NACE 4 digits level (code and label)

in RON thousands

	Water and marine resources (WTR)		Circular economy (CE)	
	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
	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (CE)	Of which environmentally sustainable (CE)
4950 - Transport via pipeline	-	-	-	-
3522 - Distribution of gaseous fuels through mains	-	-	-	-
1920 - Manufacture of refined petroleum products	-	-	-	-
3523 - Trade of gas through mains	-	-	-	-
3514 - Trade of electricity	-	-	-	-
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	531	-
3821 - Treatment and disposal of non-hazardous waste	-	-	-	-
7022 - Business and other management consultancy activities	-	-	-	-
0620 - Extraction of natural gas	-	-	-	-
0610 - Extraction of crude petroleum	-	-	-	-
3513 - Distribution of electricity	-	-	-	-
4636 - Wholesale of sugar and chocolate and sugar confectionery	-	-	-	-
2910 - Manufacture of motor vehicles	-	-	-	-
4673 - Wholesale of wood, construction materials and sanitary equipment	-	-	-	-
4120 - Construction of residential and non-residential buildings	-	-	5	-

31 December 2024

GROUP

Breakdown by sector - NACE 4 digits level (code and label)

in RON thousands

	Pollution (PPC)		Biodiversity and Ecosystems (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
	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (BIO)	Of which environmentally sustainable (BIO)
4950 - Transport via pipeline	-	-	-	-
3522 - Distribution of gaseous fuels through mains	-	-	-	-
1920 - Manufacture of refined petroleum products	-	-	-	-
3523 - Trade of gas through mains	-	-	-	-
3514 - Trade of electricity	-	-	-	-
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	-	-
3821 - Treatment and disposal of non-hazardous waste	-	-	-	-
7022 - Business and other management consultancy activities	-	-	-	-
0620 - Extraction of natural gas	-	-	-	-
0610 - Extraction of crude petroleum	-	-	-	-
3513 - Distribution of electricity	-	-	-	-
4636 - Wholesale of sugar and chocolate and sugar confectionery	-	-	-	-
2910 - Manufacture of motor vehicles	-	-	-	-
4673 - Wholesale of wood, construction materials and sanitary equipment	-	-	-	-
4120 - Construction of residential and non-residential buildings	-	-	-	-

31 December 2024 GROUP Breakdown by sector - NACE 4 digits level (code and label) in RON thousands	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	
	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD
	[Gross] carrying amount	[Gross] carrying amount
	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
4950 - Transport via pipeline	508,644	503,710
3522 - Distribution of gaseous fuels through mains	330,116	330,116
1920 - Manufacture of refined petroleum products	197,973	56,379
3523 - Trade of gas through mains	186,182	186,182
3514 - Trade of electricity	151,550	146,539
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	141,998	132,108
3821 - Treatment and disposal of non-hazardous waste	63,746	-
7022 - Business and other management consultancy activities	52,121	-
0620 - Extraction of natural gas	38,802	-
0610 - Extraction of crude petroleum	33,101	8,399
3513 - Distribution of electricity	21,426	20,717
4636 - Wholesale of sugar and chocolate and sugar confectionery	11,265	-
2910 - Manufacture of motor vehicles	3,119	813
4673 - Wholesale of wood, construction materials and sanitary equipment	258	219
4120 - Construction of residential and non-residential buildings	20	3

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those 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

2. 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.

31 December 2023

**BANK**

**Breakdown by sector - NACE 4 digits level (code and label)**

**in RON thousands**

	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
	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	
	Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)	
3523 - Trade of gas through mains	407,360	397,424	0	0	-	-	0	0
3522 - Distribution of gaseous fuels through mains	313,662	306,011	0	0	-	-	0	0
3514 - Trade of electricity	113,858	105,725	0	0	-	-	0	0
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	77,684	72,281	0	0	-	-	0	0
2932 - Manufacture of other parts and accessories for motor vehicles	75,039	16,509	0	0	-	-	0	0
0610 - Extraction of crude petroleum	23,155	5,034	0	0	-	-	0	0
3513 - Distribution of electricity	7,877	7,314	0	0	-	-	0	0
4673 - Wholesale of wood, construction materials and sanitary equipment	1,253	1,094	0	0	-	-	0	0
2910 - Manufacture of motor vehicles	917	195	0	0	-	-	0	0
3511 - Production of electricity	107	99	0	0	-	-	0	0
4120 - Construction of residential and non-residential buildings	17	4	0	0	-	-	0	0

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**BANK**

**Breakdown by sector - NACE 4 digits level (code and label)**

**in RON thousands**

	Water and marine resources (WTR)		Circular economy (CE)	
	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
	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (CE)	Of which environmentally sustainable (CE)
3523 - Trade of gas through mains				
3522 - Distribution of gaseous fuels through mains				
3514 - Trade of electricity				
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds				
2932 - Manufacture of other parts and accessories for motor vehicles				
0610 - Extraction of crude petroleum				
3513 - Distribution of electricity				
4673 - Wholesale of wood, construction materials and sanitary equipment				
2910 - Manufacture of motor vehicles				
3511 - Production of electricity				
4120 - Construction of residential and non-residential buildings				

31 December 2023 BANK Breakdown by sector - NACE 4 digits level (code and label) in RON thousands	Pollution (PPC)		Biodiversity and Ecosystems (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
	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (BIO)	Of which environmentally sustainable (BIO)
3523 - Trade of gas through mains				
3522 - Distribution of gaseous fuels through mains				
3514 - Trade of electricity				
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds				
2932 - Manufacture of other parts and accessories for motor vehicles				
0610 - Extraction of crude petroleum				
3513 - Distribution of electricity				
4673 - Wholesale of wood, construction materials and sanitary equipment				
2910 - Manufacture of motor vehicles				
3511 - Production of electricity				
4120 - Construction of residential and non-residential buildings				

31 December 2023 BANK Breakdown by sector - NACE 4 digits level (code and label) in RON thousands	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount	
	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
3523 - Trade of gas through mains	407,360	397,424	-	-
3522 - Distribution of gaseous fuels through mains	313,662	306,011	-	-
3514 - Trade of electricity	113,858	105,725	-	-
4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	77,684	72,281	-	-
2932 - Manufacture of other parts and accessories for motor vehicles	75,039	16,509	-	-
0610 - Extraction of crude petroleum	23,155	5,034	-	-
3513 - Distribution of electricity	7,877	7,314	-	-
4673 - Wholesale of wood, construction materials and sanitary equipment	1,253	1,094	-	-
2910 - Manufacture of motor vehicles	917	195	-	-
3511 - Production of electricity	107	99	-	-
4120 - Construction of residential and non-residential buildings	17	4	-	-

**Template 2 - GAR sector information (turnover)**

31 December 2024		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		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
Breakdown by sector - NACE 4 digits level (code and label)		[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
GROUP					
in RON thousands		Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCM)	Of which environmentally sustainable (CCA)	Of which environmentally sustainable (CCA)
1	0610 - Extraction of crude petroleum	38,996	3,166	-	-
2	0620 - Extraction of natural gas	22,386	-	-	-
3	1920 - Manufacture of refined petroleum products	28	3	-	-
4	3821 - Treatment and disposal of non-hazardous waste	63,746	-	-	-
5	2910 - Manufacture of motor vehicles	2,872	475	-	-
6	3513 - Distribution of electricity	9,259	8,258	-	-
7	3514 - Trade of electricity	65,493	58,408	-	-
8	3522 - Distribution of gaseous fuels through mains	20,632	13,755	-	-
9	3523 - Trade of gas through mains	11,636	7,758	-	-
10	4120 - Construction of residential and non-residential buildings	38	4	-	-
11	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	12,386	12,155	-	-
12	4636 - Wholesale of sugar and chocolate and sugar confectionery	565	-	-	-
13	4673 - Wholesale of wood, construction materials and sanitary equipment	223	174	-	-
14	7022 - Business and other management consultancy activities	13,885	-	-	-

31 December 2024

Breakdown by sector - NACE 4 digits level (code and label)

GROUP

in RON thousands

		Water and marine resources (WTR)		Circular economy (CE)	
		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
		Of which environmentally sustainable (WTR)	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (CE)	Of which environmentally sustainable (CE)
1	0610 - Extraction of crude petroleum	-	-	-	-
2	0620 - Extraction of natural gas	-	-	-	-
3	1920 - Manufacture of refined petroleum products	-	-	-	-
4	3821 - Treatment and disposal of non-hazardous waste	-	-	-	-
5	2910 - Manufacture of motor vehicles	-	-	-	-
6	3513 - Distribution of electricity	-	-	-	-
7	3514 - Trade of electricity	-	-	-	-
8	3522 - Distribution of gaseous fuels through mains	-	-	-	-
9	3523 - Trade of gas through mains	-	-	-	-
10	4120 - Construction of residential and non-residential buildings	-	-	11	-
11	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	2,588	-
12	4636 - Wholesale of sugar and chocolate and sugar confectionery	-	-	-	-
13	4673 - Wholesale of wood, construction materials and sanitary equipment	-	-	-	-
14	7022 - Business and other management consultancy activities	-	-	-	-

31 December 2024

Breakdown by sector - NACE 4 digits level (code and label)

GROUP

in RON thousands

		Pollution (PPC)		Biodiversity and Ecosystems (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
		[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
		Of which environmentally sustainable (PPC)	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (BIO)	Of which environmentally sustainable (BIO)
1	0610 - Extraction of crude petroleum	-	-	-	-
2	0620 - Extraction of natural gas	-	-	-	-
3	1920 - Manufacture of refined petroleum products	-	-	-	-
4	3821 - Treatment and disposal of non-hazardous waste	-	-	-	-
5	2910 - Manufacture of motor vehicles	-	-	-	-
6	3513 - Distribution of electricity	-	-	-	-
7	3514 - Trade of electricity	-	-	-	-
8	3522 - Distribution of gaseous fuels through mains	-	-	-	-
9	3523 - Trade of gas through mains	-	-	-	-
10	4120 - Construction of residential and non-residential buildings	-	-	-	-
11	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	-	-	-	-
12	4636 - Wholesale of sugar and chocolate and sugar confectionery	-	-	-	-
13	4673 - Wholesale of wood, construction materials and sanitary equipment	-	-	-	-
14	7022 - Business and other management consultancy activities	-	-	-	-

31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)	
		Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD
Breakdown by sector - NACE 4 digits level (code and label)		[Gross] carrying amount	[Gross] carrying amount
GROUP			
in RON thousands		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	0610 - Extraction of crude petroleum	38,996	3,166
2	0620 - Extraction of natural gas	22,386	-
3	1920 - Manufacture of refined petroleum products	28	3
4	3821 - Treatment and disposal of non-hazardous waste	63,746	-
5	2910 - Manufacture of motor vehicles	2,872	475
6	3513 - Distribution of electricity	9,259	8,258
7	3514 - Trade of electricity	65,493	58,408
8	3522 - Distribution of gaseous fuels through mains	20,632	13,755
9	3523 - Trade of gas through mains	11,636	7,758
10	4120 - Construction of residential and non-residential buildings	49	4
11	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	14,974	12,155
12	4636 - Wholesale of sugar and chocolate and sugar confectionery	565	-
13	4673 - Wholesale of wood, construction materials and sanitary equipment	223	174
14	7022 - Business and other management consultancy activities	13,885	-

31 December 2023		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		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	
Breakdown by sector - NACE 4 digits level (code and label)		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
BANK		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCA)		Of which environmentally sustainable (CCA)	
in RON thousands									
1	0610 - Extraction of crude petroleum	9,485	53	-	-	-	-	-	-
2	2910 - Manufacture of motor vehicles	838	101	-	-	-	-	-	-
3	2932 - Manufacture of other parts and accessories for motor vehicles	73,538	7,504	-	-	-	-	-	-
4	3511 - Production of electricity	36	26	-	-	-	-	-	-
5	3513 - Distribution of electricity	2,617	1,911	-	-	-	-	-	-
6	3514 - Trade of electricity	37,824	27,625	-	-	-	-	-	-
7	3522 - Distribution of gaseous fuels through mains	49,727	49,727	-	-	-	-	-	-
8	3523 - Trade of gas through mains	64,581	64,581	-	-	-	-	-	-
9	4120 - Construction of residential and non-residential buildings	40	5	-	-	-	-	-	-
10	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	7,189	6,904	-	-	-	-	-	-
11	4673 - Wholesale of wood, construction materials and sanitary equipment	1,077	865	-	-	-	-	-	-
		-	-	-	-	-	-	-	-
		-	-	-	-	-	-	-	-
		-	-	-	-	-	-	-	-

31 December 2023

Breakdown by sector - NACE 4 digits level (code and label)

BANK

in RON thousands

	Water and marine resources (WTR)		Circular economy (CE)	
	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
	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (WTR)	Of which environmentally sustainable (CE)	Of which environmentally sustainable (CE)

1	0610 - Extraction of crude petroleum				
2	2910 - Manufacture of motor vehicles				
3	2932 - Manufacture of other parts and accessories for motor vehicles				
4	3511 - Production of electricity				
5	3513 - Distribution of electricity				
6	3514 - Trade of electricity				
7	3522 - Distribution of gaseous fuels through mains				
8	3523 - Trade of gas through mains				
9	4120 - Construction of residential and non-residential buildings				
10	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds				
11	4673 - Wholesale of wood, construction materials and sanitary equipment				

- - - - -

31 December 2023

Breakdown by sector - NACE 4 digits level (code and label)

BANK

in RON thousands

- 1 0610 - Extraction of crude petroleum
- 2 2910 - Manufacture of motor vehicles
- 3 2932 - Manufacture of other parts and accessories for motor vehicles
- 4 3511 - Production of electricity
- 5 3513 - Distribution of electricity
- 6 3514 - Trade of electricity
- 7 3522 - Distribution of gaseous fuels through mains
- 8 3523 - Trade of gas through mains
- 9 4120 - Construction of residential and non-residential buildings
- 10 4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds
- 11 4673 - Wholesale of wood, construction materials and sanitary equipment

	Pollution (PPC)		Biodiversity and Ecosystems (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
	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount	[Gross] carrying amount
	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (PPC)	Of which environmentally sustainable (BIO)	Of which environmentally sustainable (BIO)
	-	-	-	-

31 December 2023		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label)		[Gross] carrying amount		[Gross] carrying amount	
BANK		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)		Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
in RON thousands					
1	0610 - Extraction of crude petroleum	9,485	53	-	-
2	2910 - Manufacture of motor vehicles	838	101	-	-
3	2932 - Manufacture of other parts and accessories for motor vehicles	73,538	7,504	-	-
4	3511 - Production of electricity	36	26	-	-
5	3513 - Distribution of electricity	2,617	1,911	-	-
6	3514 - Trade of electricity	37,824	27,625	-	-
7	3522 - Distribution of gaseous fuels through mains	49,727	49,727	-	-
8	3523 - Trade of gas through mains	64,581	64,581	-	-
9	4120 - Construction of residential and non-residential buildings	40	5	-	-
10	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	7,189	6,904	-	-
11	4673 - Wholesale of wood, construction materials and sanitary equipment	1,077	865	-	-
		-	-	-	-
		-	-	-	-
		-	-	-	-

**Template 3 - GAR KPI stock (CapEx)**

1. Institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR
3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets
4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

31 December 2024 GROUP		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total covered assets in the denominator)		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	
<b>GAR - Covered assets in both numerator and denominator</b>											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	73.56 %	11.82 %	113 %	– %	3.22 %	– %	– %	– %	– %	
2	Financial undertakings	17.47 %	0.41 %	– %	0.04 %	0.15 %	– %	– %	– %	– %	
3	Credit institutions	17.47 %	0.41 %	– %	0.04 %	0.15 %	– %	– %	– %	– %	
4	Loans and advances	32.04 %	0.75 %	– %	0.08 %	0.27 %	– %	– %	– %	– %	
5	Debt securities, including UoP	15.29 %	0.36 %	– %	0.04 %	0.13 %	– %	– %	– %	– %	
6	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
7	Other financial corporations	– %	– %	– %	– %	– %	– %	– %	– %	– %	
8	of which investment firms	– %	– %	– %	– %	– %	– %	– %	– %	– %	
9	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
11	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
12	of which management companies	– %	– %	– %	– %	– %	– %	– %	– %	– %	
13	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
15	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %	– %	– %	– %	
17	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
19	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
20	Non-financial undertakings	61.12 %	48.67 %	– %	– %	14.67 %	– %	– %	– %	– %	
21	Loans and advances	61.12 %	48.67 %	– %	– %	14.67 %	– %	– %	– %	– %	
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	

31 December 2024		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
GROUP		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 Use of Proceeds		Of which enabling		
				Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling		
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	99.38 %	1.88 %	1.88 %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	99.75 %	1.89 %	1.89 %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	0.53 %	- %	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	0.53 %	- %	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>18.35 %</b>	<b>2.95 %</b>	<b>0.28 %</b>	<b>- %</b>	<b>0.80 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2024		Water and marine resources (WTR)				Circular economy (CE)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
GROUP		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 Use of Proceeds		Of which enabling		
				Of which enabling			Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %

31 December 2024 GROUP		Water and marine resources (WTR)				Circular economy (CE)			
		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)			
		% (compared to total covered assets in the denominator)	Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling
16	of which insurance undertakings		- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	0.02 %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	0.02 %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2024 GROUP		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-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 enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %

31 December 2024

GROUP

% (compared to total covered assets in the denominator)		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-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 enabling		Of which Use of Proceeds		Of which enabling	
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2024

GROUP		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		% (compared to total covered assets in the denominator)					
		Of which Use of Proceeds	Of which transitional		Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	73.56 %	11.82 %	1.13 %	– %	3.22 %	24.94 %
2	Financial undertakings	17.47 %	0.41 %	– %	0.04 %	0.15 %	0.95 %
3	Credit institutions	17.47 %	0.41 %	– %	0.04 %	0.15 %	0.95 %
4	Loans and advances	32.04 %	0.75 %	– %	0.08 %	0.27 %	0.12 %
5	Debt securities, including UoP	15.29 %	0.36 %	– %	0.04 %	0.13 %	0.83 %
6	Equity instruments	– %	– %	– %	– %	– %	– %
7	Other financial corporations	– %	– %	– %	– %	– %	– %
8	of which investment firms	– %	– %	– %	– %	– %	– %
9	Loans and advances	– %	– %	– %	– %	– %	– %
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
11	Equity instruments	– %	– %	– %	– %	– %	– %
12	of which management companies	– %	– %	– %	– %	– %	– %
13	Loans and advances	– %	– %	– %	– %	– %	– %
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
15	Equity instruments	– %	– %	– %	– %	– %	– %
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %
17	Loans and advances	– %	– %	– %	– %	– %	– %
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
19	Equity instruments	– %	– %	– %	– %	– %	– %
20	Non-financial undertakings	61.14 %	48.67 %	– %	– %	14.67 %	5.47 %
21	Loans and advances	61.14 %	48.67 %	– %	– %	14.67 %	5.47 %
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
23	Equity instruments	– %	– %	– %	– %	– %	– %
24	Households	99.38 %	1.88 %	1.88 %	– %	– %	14.91 %
25	of which loans collateralised by residential immovable property	99.75 %	1.89 %	1.89 %	– %	– %	14.85 %
26	of which building renovation loans	– %	– %	– %	– %	– %	– %
27	of which motor vehicle loans	– %	– %	– %	– %	– %	0.06 %
28	Local governments financing	0.53 %	– %	– %	– %	– %	3.61 %
29	Housing financing	0.53 %	– %	– %	– %	– %	3.61 %
30	Other local government financing	– %	– %	– %	– %	– %	– %
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	0.05 %
<b>32</b>	<b>Total GAR assets</b>	<b>18.35 %</b>	<b>2.95 %</b>	<b>0.28 %</b>	<b>– %</b>	<b>0.80 %</b>	<b>100.00 %</b>

31 December 2023

		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
BANK		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	% (compared to total covered assets in the denominator)		Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator											
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	20.02 %	4.21 %	1.67 %	0.01 %	190 %	– %	– %	– %	– %	
2	Financial undertakings	– %	– %	– %	– %	– %	– %	– %	– %	– %	
3	Credit institutions	– %	– %	– %	– %	– %	– %	– %	– %	– %	
4	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
5	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
6	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
7	Other financial corporations	– %	– %	– %	– %	– %	– %	– %	– %	– %	
8	of which investment firms	– %	– %	– %	– %	– %	– %	– %	– %	– %	
9	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
11	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
12	of which management companies	– %	– %	– %	– %	– %	– %	– %	– %	– %	
13	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
15	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %	– %	– %	– %	
17	Loans and advances	– %	– %	– %	– %	– %	– %	– %	– %	– %	
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %	– %	– %	– %	
19	Equity instruments	– %	– %	– %	– %	– %	– %	– %	– %	– %	
20	Non-financial undertakings	2.84 %	2.54 %	– %	0.01 %	190 %	– %	– %	– %	– %	
21	Loans and advances	2.84 %	2.54 %	– %	0.01 %	190 %	– %	– %	– %	– %	
22	Debt securities, including UoP	– %	– %	1.67 %	– %	– %	– %	– %	– %	– %	
23	Equity instruments	– %	– %	1.67 %	– %	– %	– %	– %	– %	– %	
24	Households	17.18 %	1.67 %	1.67 %	– %	– %	– %	– %	– %	– %	
25	of which loans collateralised by residential immovable property	17.18 %	1.67 %	1.67 %	– %	– %	– %	– %	– %	– %	
26	of which building renovation loans	– %	– %	– %	– %	– %	– %	– %	– %	– %	
27	of which motor vehicle loans	– %	– %	– %	– %	– %	– %	– %	– %	– %	
28	Local governments financing	– %	– %	– %	– %	– %	– %	– %	– %	– %	
29	Housing financing	– %	– %	– %	– %	– %	– %	– %	– %	– %	
30	Other local government financing	– %	– %	– %	– %	– %	– %	– %	– %	– %	
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	– %	– %	– %	– %	
32	<b>Total GAR assets</b>	<b>20.02 %</b>	<b>4.21 %</b>	<b>1.67 %</b>	<b>0.01 %</b>	<b>190 %</b>	<b>– %</b>	<b>– %</b>	<b>– %</b>	<b>– %</b>	

31 December 2023

BANK

		Water and marine resources (WTR)				Circular economy (CE)			
		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)			
% (compared to total covered assets in the denominator)		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2023

BANK

		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-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 enabling		Of which Use of Proceeds	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		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		
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	20.02 %	4.21 %	1.67 %	0.01 %	190 %	4.21 %
2	Financial undertakings	– %	– %	– %	– %	– %	– %
3	Credit institutions	– %	– %	– %	– %	– %	– %
4	Loans and advances	– %	– %	– %	– %	– %	– %
5	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
6	Equity instruments	– %	– %	– %	– %	– %	– %
7	Other financial corporations	– %	– %	– %	– %	– %	– %
8	of which investment firms	– %	– %	– %	– %	– %	– %
9	Loans and advances	– %	– %	– %	– %	– %	– %
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
11	Equity instruments	– %	– %	– %	– %	– %	– %
12	of which management companies	– %	– %	– %	– %	– %	– %
13	Loans and advances	– %	– %	– %	– %	– %	– %
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
15	Equity instruments	– %	– %	– %	– %	– %	– %
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %
17	Loans and advances	– %	– %	– %	– %	– %	– %
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
19	Equity instruments	– %	– %	– %	– %	– %	– %
20	Non-financial undertakings	2.84 %	2.54 %	– %	– %	190 %	2.54 %
21	Loans and advances	2.84 %	2.54 %	– %	– %	190 %	2.54 %
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
23	Equity instruments	– %	– %	– %	– %	– %	– %
24	Households	17.18 %	1.67 %	1.67 %	– %	– %	1.67 %
25	of which loans collateralised by residential immovable property	17.18 %	1.67 %	1.67 %	– %	– %	1.67 %
26	of which building renovation loans	– %	– %	– %	– %	– %	– %
27	of which motor vehicle loans	– %	– %	– %	– %	– %	– %
28	Local governments financing	– %	– %	– %	– %	– %	– %
29	Housing financing	– %	– %	– %	– %	– %	– %
30	Other local government financing	– %	– %	– %	– %	– %	– %
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	– %
32	<b>Total GAR assets</b>	<b>20.02 %</b>	<b>4.21 %</b>	<b>1.67 %</b>	<b>0.01 %</b>	<b>190 %</b>	<b>4.21 %</b>

**Template 3 - GAR KPI stock (turnover)**

31 December 2024		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		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)			
GROUP	% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	67.34 %	1.94 %	113 %	- %	0.53 %	- %	- %	- %	- %
2	Financial undertakings	17.27 %	0.29 %	- %	0.07 %	0.09 %	- %	- %	- %	- %
3	Credit institutions	17.27 %	0.29 %	- %	0.07 %	0.09 %	- %	- %	- %	- %
4	Loans and advances	31.67 %	0.53 %	- %	0.12 %	0.16 %	- %	- %	- %	- %
5	Debt securities, including UoP	15.12 %	0.25 %	- %	0.06 %	0.08 %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	9.21 %	3.66 %	- %	- %	2.41 %	- %	- %	- %	- %
21	Loans and advances	9.21 %	3.66 %	- %	- %	2.41 %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	108.04 %	1.88 %	188 %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	108.45 %	1.89 %	189 %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	0.53 %	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	0.53 %	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>16.80 %</b>	<b>0.48 %</b>	<b>0.28 %</b>	<b>- %</b>	<b>0.13 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2024

GROUP	% (compared to total covered assets in the denominator)	Water and marine resources (WTR)				Circular economy (CE)			
		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)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	- %	- %	- %	- %	0.02 %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	0.09 %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	0.09 %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2024

GROUP	% (compared to total covered assets in the denominator)	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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2024

		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
GROUP		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	
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	62.18 %	1.94 %	1.13 %	– %	0.53 %	24.94 %
2	Financial undertakings	17.27 %	0.29 %	– %	0.07 %	0.09 %	0.95 %
3	Credit institutions	17.27 %	0.29 %	– %	0.07 %	0.09 %	0.95 %
4	Loans and advances	31.67 %	0.53 %	– %	0.12 %	0.16 %	0.12 %
5	Debt securities, including UoP	15.12 %	0.25 %	– %	0.06 %	0.08 %	0.83 %
6	Equity instruments	– %	– %	– %	– %	– %	– %
7	Other financial corporations	– %	– %	– %	– %	– %	– %
8	of which investment firms	– %	– %	– %	– %	– %	– %
9	Loans and advances	– %	– %	– %	– %	– %	– %
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
11	Equity instruments	– %	– %	– %	– %	– %	– %
12	of which management companies	– %	– %	– %	– %	– %	– %
13	Loans and advances	– %	– %	– %	– %	– %	– %
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
15	Equity instruments	– %	– %	– %	– %	– %	– %
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %
17	Loans and advances	– %	– %	– %	– %	– %	– %
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
19	Equity instruments	– %	– %	– %	– %	– %	– %
20	Non-financial undertakings	9.30 %	3.66 %	– %	– %	2.41 %	5.47 %
21	Loans and advances	9.30 %	3.66 %	– %	– %	2.41 %	5.47 %
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
23	Equity instruments	– %	– %	– %	– %	– %	– %
24	Households	99.38 %	1.88 %	1.88 %	– %	– %	14.91 %
25	of which loans collateralised by residential immovable property	99.75 %	1.89 %	1.89 %	– %	– %	14.85 %
26	of which building renovation loans	– %	– %	– %	– %	– %	– %
27	of which motor vehicle loans	– %	– %	– %	– %	– %	0.06 %
28	Local governments financing	0.53 %	– %	– %	– %	– %	3.61 %
29	Housing financing	0.53 %	– %	– %	– %	– %	3.61 %
30	Other local government financing	– %	– %	– %	– %	– %	– %
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	0.05 %
32	<b>Total GAR assets</b>	<b>15.51 %</b>	<b>0.48 %</b>	<b>0.28 %</b>	<b>– %</b>	<b>0.13 %</b>	<b>100.00 %</b>

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BANK		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		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)				
% (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	
GAR - Covered assets in both numerator and denominator											
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	17.90 %	2.11 %	1.67 %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	0.04 %	- %	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	0.04 %	- %	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	0.04 %	- %	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	0.69 %	0.44 %	- %	- %	0.40 %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	1.67 %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	1.67 %	- %	- %	- %	- %	- %	- %	- %
24	Households	17.18 %	1.67 %	1.67 %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	17.18 %	1.67 %	1.67 %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>17.90 %</b>	<b>2.11 %</b>	<b>1.67 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		Water and marine resources (WTR)				Circular economy (CE)			
		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)			
		% (compared to total covered assets in the denominator)		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds	
<b>BANK</b>									
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		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-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 enabling		Of which Use of Proceeds	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
BANK		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		
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	17.90 %	2.11 %	1.67 %	- %	- %	2 %
2	Financial undertakings	0.04 %	- %	- %	- %	- %	- %
3	Credit institutions	0.04 %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	0.04 %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	0.69 %	0.44 %	- %	- %	0.40 %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %
24	Households	17.18 %	1.67 %	1.67 %	- %	- %	2 %
25	of which loans collateralised by residential immovable property	17.18 %	1.67 %	1.67 %	- %	- %	2 %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>17.90 %</b>	<b>2.11 %</b>	<b>1.67 %</b>	<b>- %</b>	<b>- %</b>	<b>2 %</b>

#### Template 4 - GAR KPI flow (CapEx)

1. Institution shall disclose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

31 December 2024		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		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-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
GROUP											
% (compared to total covered assets in the denominator)											
GAR - Covered assets in both numerator and denominator											
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	84.43 %	25.34 %	0.93 %	- %	3.94 %	- %	- %	- %	- %	
2	Financial undertakings	32.04 %	0.75 %	- %	0.08 %	0.27 %	- %	- %	- %	- %	
3	Credit institutions	32.04 %	0.75 %	- %	0.08 %	0.27 %	- %	- %	- %	- %	
4	Loans and advances	32.04 %	0.75 %	- %	0.08 %	0.27 %	- %	- %	- %	- %	
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %	
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %	
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %	- %	
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %	
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %	
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	
20	Non-financial undertakings	76.98 %	72.49 %	- %	- %	11.70 %	- %	- %	- %	- %	
21	Loans and advances	76.98 %	72.49 %	- %	- %	11.70 %	- %	- %	- %	- %	
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %	
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %	
24	Households	98.88 %	1.61 %	1.61 %	- %	- %	- %	- %	- %	- %	
25	of which loans collateralised by residential immovable property	99.83 %	1.62 %	1.62 %	- %	- %	- %	- %	- %	- %	
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %	- %	
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %	- %	
28	Local governments financing	5.87 %	- %	- %	- %	- %	- %	- %	- %	- %	
29	Housing financing	5.87 %	- %	- %	- %	- %	- %	- %	- %	- %	
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %	- %	
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %	- %	
32	<b>Total GAR assets</b>	<b>13.92 %</b>	<b>4.18 %</b>	<b>0.15 %</b>	<b>- %</b>	<b>0.65 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	

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GROUP	% (compared to total covered assets in the denominator)	Water and marine resources (WTR)				Circular economy (CE)			
		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)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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GROUP	% (compared to total covered assets in the denominator)	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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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GROUP % (compared to total covered assets in the denominator)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which transitional	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	84.43 %	25.34 %	0.93 %	– %	3.94 %	16.49 %
2	Financial undertakings	32.04 %	0.75 %	– %	0.08 %	0.27 %	0.37 %
3	Credit institutions	32.04 %	0.75 %	– %	0.08 %	0.27 %	0.37 %
4	Loans and advances	32.04 %	0.75 %	– %	0.08 %	0.27 %	0.37 %
5	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
6	Equity instruments	– %	– %	– %	– %	– %	– %
7	Other financial corporations	– %	– %	– %	– %	– %	– %
8	of which investment firms	– %	– %	– %	– %	– %	– %
9	Loans and advances	– %	– %	– %	– %	– %	– %
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
11	Equity instruments	– %	– %	– %	– %	– %	– %
12	of which management companies	– %	– %	– %	– %	– %	– %
13	Loans and advances	– %	– %	– %	– %	– %	– %
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
15	Equity instruments	– %	– %	– %	– %	– %	– %
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %
17	Loans and advances	– %	– %	– %	– %	– %	– %
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
19	Equity instruments	– %	– %	– %	– %	– %	– %
20	Non-financial undertakings	76.98 %	72.49 %	– %	– %	11.70 %	5.55 %
21	Loans and advances	76.98 %	72.49 %	– %	– %	11.70 %	5.55 %
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
23	Equity instruments	– %	– %	– %	– %	– %	– %
24	Households	98.88 %	1.61 %	1.61 %	– %	– %	9.58 %
25	of which loans collateralised by residential immovable property	99.83 %	1.62 %	1.62 %	– %	– %	9.49 %
26	of which building renovation loans	– %	– %	– %	– %	– %	– %
27	of which motor vehicle loans	– %	– %	– %	– %	– %	0.09 %
28	Local governments financing	5.87 %	– %	– %	– %	– %	0.99 %
29	Housing financing	5.87 %	– %	– %	– %	– %	0.99 %
30	Other local government financing	– %	– %	– %	– %	– %	– %
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	– %
32	<b>Total GAR assets</b>	<b>13.92 %</b>	<b>4.18 %</b>	<b>0.15 %</b>	<b>– %</b>	<b>0.65 %</b>	<b>100.00 %</b>

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	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			
	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)			
% (compared to flow of total eligible assets)			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	2.04 %	1.04 %	0.13 %	0.01 %	0.77 %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	0.98 %	0.91 %	- %	0.01 %	0.77 %	- %	- %	- %	- %
21	Loans and advances	0.98 %	0.91 %	- %	0.01 %	0.77 %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	1.06 %	0.13 %	0.13 %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	1.06 %	0.13 %	0.13 %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>2.04 %</b>	<b>1.04 %</b>	<b>0.13 %</b>	<b>0.01 %</b>	<b>0.77 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		Water and marine resources (WTR)				Circular economy (CE)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to flow of total eligible assets)		Of which Use of Proceeds		Of which enabling	Of which Use of Proceeds		Of which enabling		
GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		% (compared to flow of total eligible assets)		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of total eligible assets)		Of which Use of Proceeds		Of which transitional	Of which enabling		
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	2.04 %	1.04 %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	0.98 %	0.91 %	- %	- %	- %	- %
21	Loans and advances	0.98 %	0.91 %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %
24	Households	1.06 %	0.13 %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	1.06 %	0.13 %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>2.04 %</b>	<b>1.04 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

**Template 4 - GAR KPI flow (turnover)**

31 December 2024		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
GROUP	% (compared to flow of total eligible assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
<b>GAR - Covered assets in both numerator and denominator</b>										
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	62.79 %	3.55 %	0.93 %	- %	1.63 %	- %	- %	- %	- %
2	Financial undertakings	31.67 %	0.53 %	- %	0.12 %	0.16 %	- %	- %	- %	- %
3	Credit institutions	31.67 %	0.53 %	- %	0.12 %	0.16 %	- %	- %	- %	- %
4	Loans and advances	31.67 %	0.53 %	- %	0.12 %	0.16 %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	12.66 %	7.74 %	- %	- %	4.85 %	- %	- %	- %	- %
21	Loans and advances	12.66 %	7.74 %	- %	- %	4.85 %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	98.88 %	1.61 %	1.61 %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	99.83 %	1.62 %	1.62 %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	5.87 %	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	5.87 %	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>10.35 %</b>	<b>0.59 %</b>	<b>0.15 %</b>	<b>- %</b>	<b>0.27 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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GROUP	% (compared to flow of total eligible assets)	Water and marine resources (WTR)				Circular economy (CE)			
		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)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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GROUP	% (compared to flow of total eligible assets)	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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
GROUP		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		
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	62.79 %	3.55 %	0.93 %	– %	1.63 %	16.49 %
2	Financial undertakings	31.67 %	0.53 %	– %	0.12 %	0.16 %	0.37 %
3	Credit institutions	31.67 %	0.53 %	– %	0.12 %	0.16 %	0.37 %
4	Loans and advances	31.67 %	0.53 %	– %	0.12 %	0.16 %	0.37 %
5	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
6	Equity instruments	– %	– %	– %	– %	– %	– %
7	Other financial corporations	– %	– %	– %	– %	– %	– %
8	of which investment firms	– %	– %	– %	– %	– %	– %
9	Loans and advances	– %	– %	– %	– %	– %	– %
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
11	Equity instruments	– %	– %	– %	– %	– %	– %
12	of which management companies	– %	– %	– %	– %	– %	– %
13	Loans and advances	– %	– %	– %	– %	– %	– %
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
15	Equity instruments	– %	– %	– %	– %	– %	– %
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %
17	Loans and advances	– %	– %	– %	– %	– %	– %
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
19	Equity instruments	– %	– %	– %	– %	– %	– %
20	Non-financial undertakings	12.66 %	7.74 %	– %	– %	4.85 %	5.55 %
21	Loans and advances	12.66 %	7.74 %	– %	– %	4.85 %	5.55 %
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
23	Equity instruments	– %	– %	– %	– %	– %	– %
24	Households	98.88 %	1.61 %	1.61 %	– %	– %	9.58 %
25	of which loans collateralised by residential immovable property	99.83 %	1.62 %	1.62 %	– %	– %	9.49 %
26	of which building renovation loans	– %	– %	– %	– %	– %	– %
27	of which motor vehicle loans	– %	– %	– %	– %	– %	0.09 %
28	Local governments financing	5.87 %	– %	– %	– %	– %	0.99 %
29	Housing financing	5.87 %	– %	– %	– %	– %	0.99 %
30	Other local government financing	– %	– %	– %	– %	– %	– %
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	– %
32	<b>Total GAR assets</b>	<b>10.35 %</b>	<b>0.59 %</b>	<b>0.15 %</b>	<b>– %</b>	<b>0.27 %</b>	<b>100.00 %</b>

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		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to flow of total eligible assets)		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which enabling	
GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	124 %	0.28 %	0.13 %	- %	0.15 %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	0.18 %	0.15 %	- %	- %	0.15 %	- %	- %	- %
21	Loans and advances	0.18 %	0.15 %	- %	- %	0.15 %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	1.06 %	0.13 %	0.13 %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	1.06 %	0.13 %	0.13 %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
32	<b>Total GAR assets</b>	<b>1.24 %</b>	<b>0.28 %</b>	<b>0.13 %</b>	<b>- %</b>	<b>0.15 %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		Water and marine resources (WTR)				Circular economy (CE)			
		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)			
		% (compared to flow of total eligible assets)		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

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		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-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		% (compared to flow of total eligible assets)		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	- %	- %	- %	- %	- %	- %	- %	- %
2	Financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
3	Credit institutions	- %	- %	- %	- %	- %	- %	- %	- %
4	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
5	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
6	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
7	Other financial corporations	- %	- %	- %	- %	- %	- %	- %	- %
8	of which investment firms	- %	- %	- %	- %	- %	- %	- %	- %
9	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
10	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
11	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
12	of which management companies	- %	- %	- %	- %	- %	- %	- %	- %
13	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
14	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
15	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
16	of which insurance undertakings	- %	- %	- %	- %	- %	- %	- %	- %
17	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
18	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
19	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
20	Non-financial undertakings	- %	- %	- %	- %	- %	- %	- %	- %
21	Loans and advances	- %	- %	- %	- %	- %	- %	- %	- %
22	Debt securities, including UoP	- %	- %	- %	- %	- %	- %	- %	- %
23	Equity instruments	- %	- %	- %	- %	- %	- %	- %	- %
24	Households	- %	- %	- %	- %	- %	- %	- %	- %
25	of which loans collateralised by residential immovable property	- %	- %	- %	- %	- %	- %	- %	- %
26	of which building renovation loans	- %	- %	- %	- %	- %	- %	- %	- %
27	of which motor vehicle loans	- %	- %	- %	- %	- %	- %	- %	- %
28	Local governments financing	- %	- %	- %	- %	- %	- %	- %	- %
29	Housing financing	- %	- %	- %	- %	- %	- %	- %	- %
30	Other local government financing	- %	- %	- %	- %	- %	- %	- %	- %
31	Collateral obtained by taking possession: residential and commercial immovable properties	- %	- %	- %	- %	- %	- %	- %	- %
<b>32</b>	<b>Total GAR assets</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>	<b>- %</b>

31 December 2023

		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of total eligible assets)		Of which Use of Proceeds			Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1.24 %	0.28 %	0.13 %	– %	0.15 %	0.28 %
2	Financial undertakings	– %	– %	– %	– %	– %	– %
3	Credit institutions	– %	– %	– %	– %	– %	– %
4	Loans and advances	– %	– %	– %	– %	– %	– %
5	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
6	Equity instruments	– %	– %	– %	– %	– %	– %
7	Other financial corporations	– %	– %	– %	– %	– %	– %
8	of which investment firms	– %	– %	– %	– %	– %	– %
9	Loans and advances	– %	– %	– %	– %	– %	– %
10	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
11	Equity instruments	– %	– %	– %	– %	– %	– %
12	of which management companies	– %	– %	– %	– %	– %	– %
13	Loans and advances	– %	– %	– %	– %	– %	– %
14	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
15	Equity instruments	– %	– %	– %	– %	– %	– %
16	of which insurance undertakings	– %	– %	– %	– %	– %	– %
17	Loans and advances	– %	– %	– %	– %	– %	– %
18	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
19	Equity instruments	– %	– %	– %	– %	– %	– %
20	Non-financial undertakings	0.18 %	0.15 %	– %	– %	0.15 %	0.15 %
21	Loans and advances	0.18 %	0.15 %	– %	– %	0.15 %	0.15 %
22	Debt securities, including UoP	– %	– %	– %	– %	– %	– %
23	Equity instruments	– %	– %	– %	– %	– %	– %
24	Households	1.06 %	0.13 %	0.13 %	– %	– %	0.13 %
25	of which loans collateralised by residential immovable property	1.06 %	0.13 %	0.13 %	– %	– %	0.13 %
26	of which building renovation loans	– %	– %	– %	– %	– %	– %
27	of which motor vehicle loans	– %	– %	– %	– %	– %	– %
28	Local governments financing	– %	– %	– %	– %	– %	– %
29	Housing financing	– %	– %	– %	– %	– %	– %
30	Other local government financing	– %	– %	– %	– %	– %	– %
31	Collateral obtained by taking possession: residential and commercial immovable properties	– %	– %	– %	– %	– %	– %
32	<b>Total GAR assets</b>	<b>1.24 %</b>	<b>0.28 %</b>	<b>0.13 %</b>	<b>– %</b>	<b>0.15 %</b>	<b>0.28 %</b>

## Template 5 – GAR KPI off-balance-sheet exposures (CapEX)

1. Institution 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, and by applying the formulas proposed in this template 2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

31 December 2024		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
GROUP		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		
1	Financial guarantees (FinGuar KPI)	6.44 %	3.66 %	– %	– %	1.77 %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
31 December 2024		Water and marine resources (WTR)				Circular economy (CE)				
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total eligible off-balance sheet assets)		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 enabling		Of which Use of Proceeds	Of which enabling			
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
31 December 2024		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total eligible off-balance sheet assets)		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 enabling		Of which Use of Proceeds	Of which enabling			
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	

31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds		Of which transitional		Of which enabling	
1	Financial guarantees (FinGuar KPI)	6.44 %	3.66 %	– %	– %	– %	1.77 %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %

31 December 2023		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total covered assets in the denominator)		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 Use of Proceeds		Of which enabling	
1	Financial guarantees (FinGuar KPI)	5.95 %	4.93 %	– %	0.10 %	2.07 %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		Water and marine resources (WTR)				Circular economy (CE)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total covered assets in the denominator)		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 enabling		Of which Use of Proceeds		Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total covered assets in the denominator)		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 enabling		Of which Use of Proceeds		Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023

TOTAL (CCM + CCA + WTR + CE + PPC + BIO)

BANK % (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which Use of Proceeds		Of which transitional		Of which enabling
1	Financial guarantees (FinGuar KPI)	5.95 %	4.93 %	– %	0.10 %	2.07 %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %

### GAR KPI off-balance-sheet exposures (turnover)

31 December 2024

Climate Change Mitigation (CCM)

Climate Change Adaptation (CCA)

GROUP % (compared to total eligible off-balance sheet assets)		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)					
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
1	Financial guarantees (FinGuar KPI)	36.00 %	34.81 %	– %	– %	21.51 %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2024

Water and marine resources (WTR)

Circular economy (CE)

GROUP % (compared to total eligible off-balance sheet assets)		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)					
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2024

Pollution (PPC)

Biodiversity and Ecosystems (BIO)

GROUP % (compared to total eligible off-balance sheet assets)		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)					
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling			
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)								
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
		Of which Use of Proceeds			Of which transitional		Of which enabling			
1	Financial guarantees (FinGuar KPI)	36.00 %	34.81 %	– %	– %	– %	– %	– %	– %	21.51 %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)		
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
% (compared to total covered assets in the denominator)		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
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		Water and marine resources (WTR)				Circular economy (CE)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total covered assets in the denominator)		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 enabling		Of which Use of Proceeds		Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
BANK		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
% (compared to total covered assets in the denominator)		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 enabling		Of which Use of Proceeds		Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %

TOTAL (CCM + CCA + WTR + CE + PPC + BIO)

31 December 2023		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
BANK						
% (compared to total covered assets in the denominator)		Of which Use of Proceeds			Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %

**Template 5 GAR KPI off-balance-sheet exposures (Flow CapEx)**

31 December 2024		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
GROUP		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 transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	4.98 %	1.44 %	– %	– %	0.75 %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
31 December 2024		Water and marine resources (WTR)				Circular economy (CE)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
GROUP		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 enabling		Of which Use of Proceeds	Of which enabling			
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
31 December 2024		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)				
GROUP		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 enabling		Of which Use of Proceeds	Of which enabling			
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	
31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)								
GROUP		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 transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	4.99 %	1.44 %	– %	– %	0.75 %	– %	– %	– %	
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	

31 December 2023		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
Bank		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 transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	2.06 %	1.26 %	– %	– %	0.82 %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		Water and marine resources (WTR)				Circular economy (CE)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
Bank		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 enabling		Of which Use of Proceeds	Of which enabling		Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		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)				
Bank		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 enabling		Of which Use of Proceeds	Of which enabling		Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %

31 December 2023		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
Bank		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 enabling
1	Financial guarantees (FinGuar KPI)	2.06 %	1.26 %	– %	– %	0.82 %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %

**Template GAR KPI off-balance-sheet exposures (Flow turnover)**

31 December 2024		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
GROUP		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 transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	15.56 %	13.88 %	– %	– %	9.03 %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
31 December 2024		Water and marine resources (WTR)				Circular economy (CE)				
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
31 December 2024		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	– %
31 December 2024		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
GROUP		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)								
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling	
1	Financial guarantees (FinGuar KPI)	15.56 %	13.88 %	– %	– %	9.03 %	– %	– %	– %	
2	Assets under management (AuM KPI)	– %	– %	– %	– %	– %	– %	– %	– %	

31 December 2023		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
BANK		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 transitional	Of which enabling		
1	Financial guarantees (FinGuar KPI)	- %	- %	- %	- %	- %	- %	- %	- %	- %	
2	Assets under management (AuM KPI)	- %	- %	- %	- %	- %	- %	- %	- %	- %	
31 December 2023		Water and marine resources (WTR)					Circular economy (CE)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
BANK		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 enabling		Of which Use of Proceeds	Of which enabling				
1	Financial guarantees (FinGuar KPI)	- %	- %	- %	- %	- %	- %	- %	- %	- %	
2	Assets under management (AuM KPI)	- %	- %	- %	- %	- %	- %	- %	- %	- %	
31 December 2023		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)				
BANK		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 enabling		Of which Use of Proceeds	Of which enabling				
1	Financial guarantees (FinGuar KPI)	- %	- %	- %	- %	- %	- %	- %	- %	- %	
2	Assets under management (AuM KPI)	- %	- %	- %	- %	- %	- %	- %	- %	- %	
31 December 2023		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)									
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
BANK		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						
1	Financial guarantees (FinGuar KPI)	- %	- %	- %	- %	- %					
2	Assets under management (AuM KPI)	- %	- %	- %	- %	- %					

## Additional mandatory information

### Exposures to Taxonomy (non-)eligible economic activities/covered assets for the four new environmental objectives and activities

The Group discloses two quantitative indicators in accordance with article 10 (3) of the Delegated Regulation supplementing the EU Taxonomy Regulation. The disclosure of these quantitative KPIs is supplemented by qualitative information in accordance with Annex XI of the Delegated Regulation.

- Exposures to taxonomy-eligible economic activities/covered assets:
- Exposures to taxonomy non-eligible economic activities/covered assets:

### Exposures to taxonomy (non-)eligible and taxonomy (non-)aligned economic activities/covered assets for nuclear and gas economic activities (CapEx) in accordance with Annex XII

For fiscal year 2023 the templates for KPI financial guarantees flow/stock and KPI assets under management flow / stock were not reported.

### Disclosure template 1 activities in the areas of nuclear energy and fossil gas

GARSTOCK			
Nuclear energy related activities		31/12/2024	31/12/2023
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	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	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.	YES	NO
Fossil gas related activities			
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES	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	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO	NO

**Disclosure template 1 activities in the areas of nuclear energy and fossil gas**

<b>GAR FLOW</b>			
<b>Nuclear energy related activities</b>		<b>31/12/2024</b>	<b>31/12/2023</b>
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	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	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.	YES	NO
<b>Fossil gas related activities</b>			
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES	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	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO	NO

**Disclosure template 1 activities in the areas of nuclear energy and fossil gas**

<b>KPI Financial Guarantees STOCK</b>		
<b>Nuclear energy related activities</b>		<b>31/12/2024</b>
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
<b>Fossil gas related activities</b>		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	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

## Disclosure template 1 activities in the areas of nuclear energy and fossil gas

<b>KPI Financial Guarantees FLOW</b>		
<b>Nuclear energy related activities</b>		<b>31/12/2024</b>
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
<b>Fossil gas related activities</b>		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	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

## Disclosure template 1 activities in the areas of nuclear energy and fossil gas

<b>KPI Assets under Management STOCK</b>		
<b>Nuclear energy related activities</b>		<b>31/12/2024</b>
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
<b>Fossil gas related activities</b>		
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.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

**Disclosure template 1 activities in the areas of nuclear energy and fossil gas**

<b>KPI Assets under Management FLOW</b>		
<b>Nuclear energy related activities</b>		<b>31/12/2024</b>
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
<b>Fossil gas related activities</b>		
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.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

**Disclosure template 2 taxonomy-aligned economic activities - GAR stock - CapEx**

31/12/2024 GROUP in RON thousands		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	15,582	0.03 %	15,582	0.03 %	–	– %
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	1,517,758	2.92 %	1,517,758	2.92 %	–	– %
8	<b>Total applicable KPI</b>	<b>1,533,340</b>	<b>2.95 %</b>	<b>1,533,340</b>	<b>2.95 %</b>	<b>–</b>	<b>– %</b>

**Disclosure template 2 taxonomy-aligned economic activities - GAR stock - Turnover**

31/12/2024 GROUP in RON thousands		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	9,650	0.02 %	9,650	0.02 %	–	– %
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	242,067	0.47 %	242,067	0.47 %	–	– %
8	<b>Total applicable KPI</b>	<b>251,717</b>	<b>0.48 %</b>	<b>251,717</b>	<b>0.48 %</b>	<b>–</b>	<b>– %</b>

**Disclosure template 2 taxonomy-aligned economic activities - GAR flow - CapEx**

31/12/2024 GROUP in RON thousands		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	15,582	0.09 %	15,582	0.10 %	–	– %
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	705,316	4.09 %	705,316	4.09 %	–	– %
8	<b>Total applicable KPI</b>	<b>720,898</b>	<b>4.18 %</b>	<b>720,898</b>	<b>4.18 %</b>	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - GAR flow - Turnover**

31/12/2024 GROUP in RON thousands		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	6,114	0.04 %	6,114	0.04 %	–	– %
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	94,885	0.55 %	94,885	0.55 %	–	– %
8	<b>Total applicable KPI</b>	<b>100,999</b>	<b>0.59 %</b>	<b>100,999</b>	<b>0.59 %</b>	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees stock - CapEx**

31/12/2024 GROUP in RON thousands		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	12,340	0.27 %	12,340	0.27 %	–	– %
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	157,125	3.39 %	157,125	3.39 %	–	– %
8	<b>Total applicable KPI</b>	<b>169,465</b>	<b>3.66 %</b>	<b>169,465</b>	<b>3.66 %</b>	<b>–</b>	<b>– %</b>

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees stock - Turnover**

31/12/2024 GROUP in RON thousands		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	4,842	0.10 %	4,842	0.10 %	–	– %
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	62,066	1.34 %	62,066	1.34 %	–	– %
8	<b>Total applicable KPI</b>	<b>66,908</b>	<b>1.44 %</b>	<b>66,908</b>	<b>1.44 %</b>	<b>–</b>	<b>– %</b>

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees flow - CapEx**

31/12/2024 GROUP in RON thousands		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	12,340	3.24 %	12,340	3.24 %	–	– %
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	120,121	31.57 %	120,121	31.57 %	–	– %
8	<b>Total applicable KPI</b>	<b>132,461</b>	<b>34.81 %</b>	<b>132,461</b>	<b>34.81 %</b>	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees flow - Turnover**

31/12/2024 GROUP in RON thousands		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	4,842	1.27 %	4,842	1.27 %	–	– %
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	47,955	12.60 %	47,955	12.60 %	–	– %
8	<b>Total applicable KPI</b>	<b>52,797</b>	<b>13.88 %</b>	<b>52,797</b>	<b>13.88 %</b>	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - GAR stock - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - GAR stock - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - GAR flow - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - GAR flow - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees stock - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees stock - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees flow - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 2 taxonomy-aligned economic activities - KPI financial guarantees flow - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]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[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	0	– %	0	– %	–	– %
8	<b>Total applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - GAR stock - CapEx**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	15,582	1.02 %	15,582	1.02 %	—	— %
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	<b>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</b>	<b>1,517,758</b>	<b>98.98 %</b>	<b>1,517,758</b>	<b>98.98 %</b>	—	— %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>1,533,340</b>	<b>100.00 %</b>	<b>1,533,340</b>	<b>100.00 %</b>	—	— %

**Disclosure template 3 taxonomy-aligned economic activities - GAR stock - turnover**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	9,650	3.83 %	9,650	3.83 %	—	— %
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	<b>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</b>	<b>242,067</b>	<b>96.17 %</b>	<b>242,067</b>	<b>96.17 %</b>	—	— %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>251,717</b>	<b>100.00 %</b>	<b>251,717</b>	<b>100.00 %</b>	—	— %

**Disclosure template 3 taxonomy-aligned economic activities - GAR flow - CapEx**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	15,582	2.16 %	15,582	2.16 %	–	– %
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	<b>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</b>	<b>705,316</b>	<b>97.84 %</b>	<b>705,316</b>	<b>97.84 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>720,898</b>	<b>100.00 %</b>	<b>720,898</b>	<b>100.00 %</b>	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - GAR flow - turnover**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	6,114	6.05 %	6,114	6.05 %	–	– %
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	<b>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</b>	<b>94,885</b>	<b>93.95 %</b>	<b>94,885</b>	<b>93.95 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>100,999</b>	<b>100.00 %</b>	<b>100,999</b>	<b>100.00 %</b>	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees stock - CapEx**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	12,340	7.28 %	12,340	7.28 %	–	– %
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	<b>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</b>	<b>157,125</b>	<b>92.72 %</b>	<b>157,125</b>	<b>92.72 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>169,465</b>	<b>100.00 %</b>	<b>169,465</b>	<b>100.00 %</b>	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees stock - turnover**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	4,842	7.24 %	4,842	7.24 %	–	– %
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	<b>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</b>	<b>62,066</b>	<b>92.76 %</b>	<b>62,066</b>	<b>92.76 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>66,908</b>	<b>100.00 %</b>	<b>66,908</b>	<b>100.00 %</b>	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees flow - CapEx**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	12,340	9.32 %	12,340	9.32 %	–	– %
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	<b>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</b>	<b>120,121</b>	<b>90.68 %</b>	<b>120,121</b>	<b>90.68 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>132,461</b>	<b>100.00 %</b>	<b>132,461</b>	<b>100.00 %</b>	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees flow - turnover**

31/12/2024		Proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
<b>in RON thousands</b>							
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 4.30 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	4,842	9.17 %	4,842	9.17 %	–	– %
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	<b>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</b>	<b>47,955</b>	<b>90.83 %</b>	<b>47,955</b>	<b>90.83 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>52,797</b>	<b>100.00 %</b>	<b>52,797</b>	<b>100.00 %</b>	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - GAR stock - CapEx**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - GAR stock - turnover**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - GAR flow - CapEx**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - GAR flow - turnover**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees stock - CapEx**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees stock - turnover**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees flow - CapEx**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 3 taxonomy-aligned economic activities - KPI financial guarantees flow - turnover**

31/12/2023 GROUP in RON thousands		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[1]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[1]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[1]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[1]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	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR stock - CapEx**

31/12/2024 GROUP in RON thousands		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	42,577	0.08 %	42,577	0.08 %	—	— %
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	81	— %	81	— %	—	— %
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	<b>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</b>	<b>7,968,153</b>	<b>15.32 %</b>	<b>7,968,153</b>	<b>15.32 %</b>	—	— %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>8,010,811</b>	<b>15.40 %</b>	<b>8,010,811</b>	<b>15.40 %</b>	—	— %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR stock - turnover**

31/12/2024 GROUP in RON thousands		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	17,325	0.03 %	17,325	0.03 %	—	— %
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	28,303	0.05 %	28,303	0.05 %	—	— %
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	—	— %	0	— %	—	— %
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	<b>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</b>	<b>7,768,165</b>	<b>14.93 %</b>	<b>7,768,165</b>	<b>14.93 %</b>	—	— %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>7,813,793</b>	<b>15.02 %</b>	<b>7,813,793</b>	<b>15.02 %</b>	—	— %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR flow - CapEx**

31/12/2024 GROUP in RON thousands		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	3,754	0.02 %	3,754	0.02 %	–	– %
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	19	– %	19	– %	–	– %
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	<b>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</b>	<b>1,677,668</b>	<b>9.72 %</b>	<b>1,677,668</b>	<b>9.72 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>1,681,442</b>	<b>9.74 %</b>	<b>1,681,442</b>	<b>9.74 %</b>	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR flow - turnover**

31/12/2024 GROUP in RON thousands		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	4,130	0.02 %	4,130	0.02 %	–	– %
4	Amount and proportion of taxonomy eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5,917	0.03 %	5,917	0.03 %	–	– %
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	–	– %	0	– %	–	– %
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	<b>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</b>	<b>1,675,478</b>	<b>9.71 %</b>	<b>1,675,478</b>	<b>9.71 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>1,685,525</b>	<b>9.77 %</b>	<b>1,685,525</b>	<b>9.77 %</b>	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees stock - CapEx**

31/12/2024 GROUP in RON thousands		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	2,968	0.06 %	2,968	0.06 %	–	– %
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	–	– %	0	– %	–	– %
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	<b>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</b>	<b>125,970</b>	<b>2.72 %</b>	<b>125,970</b>	<b>2.72 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>128,938</b>	<b>2.78 %</b>	<b>128,938</b>	<b>2.78 %</b>	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees stock - turnover**

31/12/2024 GROUP in RON thousands		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	4,686	0.10 %	4,686	0.10 %	–	– %
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	–	– %	0	– %	–	– %
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	<b>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</b>	<b>159,242</b>	<b>3.44 %</b>	<b>159,242</b>	<b>3.44 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>163,928</b>	<b>3.54 %</b>	<b>163,928</b>	<b>3.54 %</b>	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees flow - CapEx**

31/12/2024 GROUP in RON thousands		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	2,968	0.78 %	2,968	0.78 %	–	– %
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	–	– %	0	– %	–	– %
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	<b>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</b>	<b>1,562</b>	<b>0.41 %</b>	<b>1,562</b>	<b>0.41 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>4,530</b>	<b>1.19 %</b>	<b>4,530</b>	<b>1.19 %</b>	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees flow - turnover**

31/12/2024 GROUP in RON thousands		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	4,686	1.23 %	4,686	1.23 %	–	– %
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	–	– %	0	– %	–	– %
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	<b>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</b>	<b>1,718</b>	<b>0.45 %</b>	<b>1,718</b>	<b>0.45 %</b>	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy aligned economic activities in the denominator of the applicable KPI</b>	<b>6,404</b>	<b>1.68 %</b>	<b>6,404</b>	<b>1.68 %</b>	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR stock - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR stock - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR flow - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - GAR flow - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees stock - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees stock - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees flow - CapEx**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

**Disclosure template 4 taxonomy-eligible but not taxonomy-aligned economic activities - KPI financial guarantees flow - turnover**

31/12/2023 BANK in RON thousands		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[1]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[1]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[1]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[1]eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	– %	–	– %	–	– %
5	Amount and proportion of taxonomy[1]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	–	– %	0	– %	–	– %
6	Amount and proportion of taxonomy[1]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	<b>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</b>	–	– %	–	– %	–	– %
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy[1]aligned economic activities in the denominator of the applicable KPI</b>	–	– %	–	– %	–	– %

### Disclosure template 5 taxonomy-non-eligible activities - GAR stock - CapEx

31/12/2024		
	in RON thousands	
		Amount Procent
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	27 – %
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	<b>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</b>	<b>42,477,787 81.65 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>42,477,814 81.65 %</b>

### Disclosure template 5 taxonomy-non-eligible activities - GAR stock - turnover

31/12/2024		
	in RON thousands	
		Amount Procent
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	27 – %
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	<b>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</b>	<b>43,954,365 84.49 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>43,954,392 84.49 %</b>

**Disclosure template 5 taxonomy-non-eligible activities - GAR flow - CapEx**

31/12/2024		
	in RON thousands	
		Amount Procent
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	6 - %
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	<b>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</b>	<b>14,855,695 86.08 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>14,855,701 86.08 %</b>

**Disclosure template 5 taxonomy-non-eligible activities - GAR flow - turnover**

31/12/2024		
	in RON thousands	
		Amount Procent
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	6 - %
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	<b>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</b>	<b>15,471,510 89.65 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>15,471,517 89.65 %</b>

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees stock - CapEx

31/12/2024		
in RON thousands		
	Amount	Procent
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	<b>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</b>	<b>4,332,637 93.56 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>4,332,637 93.56 %</b>

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees stock - turnover

31/12/2024		
in RON thousands		
	Amount	Procent
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	<b>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</b>	<b>4,400,158 95.01 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	<b>4,400,158 95.01 %</b>

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees flow - CapEx

31/12/2024		
	in RON thousands	
		Amount Procent
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	<b>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</b>	<b>243,488 64.00 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>243,488 64.00 %</b>

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees flow - turnover

31/12/2024		
	in RON thousands	
		Amount Procent
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	<b>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</b>	<b>321,278 84.44 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>321,278 84.44 %</b>

**Disclosure template 5 taxonomy-non-eligible activities - KPI assets under management stock - CapEX**

31/12/2024		
	in RON thousands	
		Amount Procent
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	<b>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</b>	<b>5,666,813 100.00 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>5,666,813 100.00 %</b>

**Disclosure template 5 taxonomy-non-eligible activities - KPI assets under management stock - turnover**

31/12/2024		
	in RON thousands	
		Amount Procent
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	<b>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</b>	<b>5,666,813 100.00 %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>5,666,813 100.00 %</b>

### Disclosure template 5 taxonomy-non-eligible activities - GAR stock - CapEx

31/12/2023		
	in RON thousands	
		Amount Procent
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	<b>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</b>	– – %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	– – %

### Disclosure template 5 taxonomy-non-eligible activities - GAR stock - turnover

31/12/2023		
	in RON thousands	
		Amount Procent
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	<b>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</b>	– – %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	– – %

### Disclosure template 5 taxonomy-non-eligible activities - GAR flow - CapEx

31/12/2023		
	in RON thousands	
		Amount Procent
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	<b>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</b>	– – %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	– – %

### Disclosure template 5 taxonomy-non-eligible activities - GAR flow - turnover

31/12/2023		
	in RON thousands	
		Amount Procent
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	<b>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</b>	– – %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	– – %

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees stock - CapEx

31/12/2023		
	in RON thousands	
		Amount Procent
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	<b>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</b>	– – %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	– – %

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees stock - turnover

31/12/2023		
	in RON thousands	
		Amount Procent
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	<b>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</b>	– – %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	– – %

### Disclosure template 5 taxonomy-non-eligible activities - KPI financial guarantees flow - CapEx

31/12/2023		
in RON thousands		
	Amount	Procent
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	<b>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</b>	<b>– %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>– %</b>

### Disclosure template 5 taxonomy-non-eligible activities - KPI assets under management stock - turnover

31/12/2023		
in RON thousands		
	Amount	Procent
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	<b>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</b>	<b>– %</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>– %</b>


### Disclosure template 5 taxonomy-non-eligible activities - KPI assets under management flow - CapEx

31/12/2023			
in RON thousands		Amount	Procent
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	<b>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</b>	–	– %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	–	– %

### Disclosure template 5 taxonomy-non-eligible activities - KPI assets under management flow - turnover

31/12/2023			
in RON thousands		Amount	Procent
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	<b>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</b>	–	– %
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	–	– %

This Report was analysed and approved by the Management Board of Raiffeisen Bank S.A in the meeting from 18 March 2025.

Alina Rus  
  
 Vice President of the Board of Directors  
 Raiffeisen Bank S.A.

## INDEPENDENT LIMITED ASSURANCE REPORT

### ON THE SUSTAINABILITY STATEMENT FOR THE FINANCIAL YEAR 2024

To the Shareholders of Raiffeisen Bank S.A.

#### Limited Assurance Conclusion

We have conducted a limited assurance engagement on the consolidated Sustainability Statement included in Note 11 from the Administrators' Report of Raiffeisen Bank S.A. (the "Bank"), and its subsidiaries (the "Group"), with registered office in Calea Floreasca, no. 246 D, District 1, Bucharest, Romania, identified by unique tax registration code RO 57756924, as at December 31, 2024 and for the period from January 1, 2024 to December 31, 2024 (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 Group to identify the information reported in the Sustainability Statement is in accordance with the description set out in chapter 1, section "SBM-2: Interests and views of stakeholders" and sub-chapters "Description of material impacts, risks and opportunities" and sub-chapter "Impact, risk and opportunity management" ("Double Materiality Assessment Process"); and
- Compliance of the relevant taxonomy disclosures detailed in chapter 4, sub-chapter "Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation" of the Sustainability Statement with the applicable reporting requirements of Article 8 of EU Regulation 852/2020 (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.

#### Other Matter

The comparative information included in the Sustainability Statement of the Bank was not subject to an assurance engagement on sustainability information prepared in accordance with the requirements of the Sustainability Legislation. Our conclusion is not modified in respect of this matter.

#### Identification of Applicable Criteria

The Sustainability Statement was prepared by the Management 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 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 4, sub-chapter “Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation” of the Sustainability Statement with Article 8 of EU Regulation 852/2020 (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, management of the Bank is 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, management of the Bank interprets 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.

Management 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 4, sub-chapter “Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation”, in compliance with Article 8 of EU Regulation 852/2020 (the “Taxonomy Regulation”);
- designing, implementing and maintaining such internal controls that management determines 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’s 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 Bank'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 management (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 statements;
- 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, 9<sup>th</sup> Floor, District 1  
Bucharest, Romania  
27 March 2025