

Non-Financial Statement

Raiffeisen Bank Romania 2023

1. Our business model

1.1 About Raiffeisen Bank

Raiffeisen Bank Romania is part of the Raiffeisen Bank International AG (RBI) Group, one of Austria's largest providers of corporate and investment banking services and a leading universal bank in Central and Eastern Europe (CEE).

The Group's 12 subsidiaries operate in Austria and Central and Eastern European countries, offering a comprehensive portfolio of financial services, including leasing, asset management, and mergers and acquisitions.

Raiffeisen Bank International

2023	2022	2021
Approx. 45,000 employees 18,6 million customers 1,500 banking units	Approx. 44,000 employees 17,6 million customers 1,770 banking units	Approx. 46,000 employees 19 million customers 1,770 banking units

1.2 Mission, vision and values

For more than 30 years we have been supporting the Romanian economy by offering financial products and services developed to meet the needs of our customers. With responsibility as a fundamental principle, we indirectly contribute to the growth and development of Romanian society, knowing that the investments we make today will be reflected in the future.

In doing so, our mission is to support the development of sustainable and thriving communities, to understand the needs of our clients and help them reach their full potential, and to provide security, guidance and easy-to-use financial services.

Collaboration

We work together. If we collaborate, discuss, listen and help each other, we will always have the desired results. We will create an environment of understanding, respect and trust, in which we encourage diversity and teamwork.

Learning

We are eager to learn. This way we come to know personal progress and learn from experiences, education and sharing knowledge. Sometimes, experimenting can lead to mistakes, but this way we will be able to become even better, because learning and curiosity help us innovate.

Responsibility

We act responsibly. We take responsibility for our actions, for significant changes. Individually or as a team, we make decisions responsibly and we are accountable for the results of our work. We are aware of the consequences of our actions and we are responsible members of society, supporting sustainable business.

Proactivity

We are proactive. We look towards the future and we lead the change. We focus on opportunities, not on threats and we transform indecision into decisions and reactivity into proactivity. Through courage and determination, we make a difference, because even slow progress today will lead to great results tomorrow.

1.3 Economic performance

The balance sheet of 2023 indicates a positive evolution towards financial planning and sustainable lending in the Romanian economy. Raiffeisen Bank Romania registered a 130% increase in investment plans, optional pensions and life insurance with savings component and record guarantees from the European Investment Fund that allow financing Romanian SMEs with over EUR 650 million in the coming years. The solid performances are supported both by the existence of a new, strategic direction that proposes personalized financial planning services to Romanians, through direct, transparent and relevant dialogue, as well as by continuing to finance the real economy and supporting sustainable businesses.

Description	2023	2022	2021
	thousands euro		
Direct economic value generated	781,343	623,161	506,721
Revenues	781,343	623,161	506,721
Economic value distributed	-622,310	-538,966	-400,968
Operating costs	-192,988	-177,758	-176,959
Employees wages and benefits	-164,448	-149,701	-124,744
Payments to shareholders	-137,847	-84,101	-69,264
Payments to the government/state budget	-124,747	-125,126	-28,721
Community investment	-2,280	-1,487	-2,280
Economic value retained	159,033	84,195	105,753

Description	2023	2022	2021
thousand euro			
Profit and loss			
Net interest income	561,672	477,683	506,721
Net fee and commission income	114,783	105,423	106,857
Net trading income	76,557	66,926	73,243
Administrative expenses	-357,435	(327,459)	(301,703)
Profit before income tax	423,907	295,703	205,018
Profit/(loss) after tax, before net income from the sale of discontinued operations	347,618	250,369	160,243
Net profit for the financial year	347,618	250,369	160,243
Number of ordinary shares	12,000	12,000	12,000
Earnings per share (thousand euros/share)	28,97	20,86	13,35
Balance sheet			
Loans and advances to banks at amortized cost	99,557	57,980	304,132
Loans and advances to customers	8,321,673	7,991,658	6,617,315
Deposits from banks	99,491	116,850	72,262
Loans from banks and other financial institutions	351	797	1,740
Deposits from customers	10,953,418	9,961,054	10,032,418
Equity (including minorities and profit)	1,501,381	1,268,540	1,050,689
Balance sheet total	14,103,176	12,534,412	11,955,584
Regulatory information			
Risk-weighted assets, including market risk	6,485,711	6,050,871	5,375,723
Total own funds	1,387,179	1,301,037	1,142,407
Total own funds requirements (RWA*8%)	518,857	484,070	430,058
Excess coverage ratio (Own funds capital requirements) = Total own funds excess	868,322	816,967	712,349
Tier 1 Capital ratio (Before Profit Incorporation)	18,77%	18,65%	18,01%
Total Capital ratio (Before Profit Incorporation)	21,39%	21,50%	21,25%
Performance Indicators			

Return on equity (ROE) before tax	33,48%	28,23%	18,61%
Return on equity (ROE) after tax	27,51%	23,93%	14,94%
Cost/income ratio	43,32%	45,94%	48,82%
Return on assets (ROA) before tax	3,19%	2,36%	1,78%
Risk/earnings ratio	-1,26%	7,43%	10,46%

1.4 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 with the purpose of reaching the envisaged objectives through implementing the adopted strategy, having an ongoing fair behavior 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.

Shareholding

Raiffeisen Bank Romania Shareholding Structure	2023
Raiffeisen SEE Region Holding GmbH	99,925%
Other shareholders (individuals and legal entities)	0,075%

In 2023, there were no changes in the Bank's shareholding. The shareholding structure is entirely private. There are no state entities in the shareholding structure of the company.

Raiffeisen Bank Romania Management

The General Meeting of Shareholders (GSM)

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 following 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 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.

Administrative Structures

The administration of Raiffeisen Bank S.A. is performed by the dual management system consisting of the Management Board and the Supervisory Board. The dual management system allows for 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 (SB)

The Supervisory Board exercises an ongoing control over the Bank's current management activity conducted by the Management Board. The Supervisory Board consists of 8 members appointed by the General Meeting of Shareholders within four-year mandates, being possible to be re-elected for additional mandates.

Supervisory Board structure by gender and age

2023	Women		Men		Total	
	Nr.	%	Nr.	%	Nr.	%
<30 years	0	0	0	0	0	0
30-50 years	0	0	1	12,5	1	12,5
>50 years	1	12,5	6	75	7	87,5
Total	1	12,5	7	87,5	8	100

The Supervisory Board has set up a number of 4 committees, namely:

- Audit Committee
- Nomination Committee
- Remuneration Committee
- Supervisory Board Risk Committee.

During 2023, 4 Supervisory Board meetings took place and their decisions were made by the unanimous votes of the attending members. Also, a number of 43 decisions were made by circulation.

The Management Board

The Management Board ensures the managing of the Bank's current business and it consists of 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.

The Management Board structure by gender and age

2023	Women		Men		Total	
	Nr.	%	Nr.	%	Nr.	%
<30 years	0	0	0	0	0	0
30-50 years	1	14,29	4	57,14	5	71,43
>50 years	0	0	2	28,57	2	28,57
Total	1	14,29	6	85,71	7	100

Competences delegated to the Management Board and its membership can be found here.

During 2023, 53 Management Board meetings took place and their decisions were made by the unanimous votes of the attending members. Also, a number of 22 decisions were made by circulation.

1.5 Business Ethics and responsibility

By implementing solid practices and policies, we are committed to responsible banking and helping to promote a positive organizational culture among employees, customers, suppliers, and other stakeholders. Within the Bank, the Compliance Department oversees and ensures an ethical business environment and prioritizes responsible business practices in all Bank operations.

In addition to complying with the legislation in force, and the regulations of the Corporate Governance Code of the Bucharest Stock Exchange, our activity is guided by the provisions of the Code of Conduct implemented at the Group level.

The Bank expects all employees to act responsibly, and not to engage in any inappropriate behavior, especially intentionally, violating or asking others to violate the Code of Conduct. Employees are advised to express their concerns and promptly report any fraudulent attempts or possible violations of laws or regulations to their managers. Any violation of the Code of Conduct may result in consequences under employment law, including early termination of employment.

The company also expects all suppliers and partners of the Bank to comply with the Code of Conduct or other identical or similar rules, regulations, and standards.

All 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.

Two channels are therefore available to them to submit complaints, while remaining anonymous:

- The Whistleblowing platform - Whispli - (managed at RBI Group level) where only a limited number of people from RBI Group Compliance or RBI Group Internal Audit will have access to the submitted complaint;
- Whistleblowing E-mail – whistle.blowing@raiffeisen.ro - dedicated local e-mail address.

Beyond the existence of a formal, organisational framework, reporting misconduct is, however, an individual responsibility. Internal rules and procedures are perhaps less important than doing things responsibly and fairly for the team and the organisation.

During the reporting period, a total of 12 whistleblowing complaints were received - concerning issues related to non-compliance with the internal regulatory framework. Five of these whistleblowing reports were upheld and investigation reports were issued, and the employees concerned received warnings. At the same time, DIAASF reiterated the importance of compliance with the internal regulatory framework.

Transparency on products and services

The commercial promotion of our products and services complies with national and international regulations in force. The bank has developed a strict framework of policies aimed at providing our customers with complete information, and at the same time protecting them from possible losses. It is beneficial for both us and the customer that the risks associated with accessing products and services are clearly explained to him.

Correct and responsible marketing communications are extremely important in this regard, because we want to offer customers the opportunity to make informed decisions, in accordance with everyone's needs and possibilities, knowing all the details and responsibilities of each party.

Conflict of interest

At Raiffeisen Bank Romania level, specific policies are defined regarding Conflicts of Interest, both for the Bank's staff and for the Governing Bodies (Management and Supervisory Boards). Governing bodies are responsible for establishing, approving, and overseeing the effective implementation of conflicts of interest policies.

Conflicts of interest are monitored to prevent bribery and corruption, as well as to prevent any other conduct that could have a negative impact on the Bank's customers and partners. The conflicts of interest internal policies are intended to help identify, assess, manage, and mitigate or prevent current and potential conflicts of interest, including those related to the financial services provided by the Bank as well as the private, personal interests of members of the management bodies, which could adversely affect the performance of their duties and responsibilities.

Internal policies require employees and management bodies to immediately report any situation that could lead to a conflict of interest resulting from close personal relationships, additional employment contracts, participation in

events, gifts, invitations, and transactions with financial instruments. Conflicts of interest could also arise in connection to acts of corruption, fraud, and market abuse.

Where conflicts of interest arise, RBRO assesses their materiality and takes appropriate mitigating action.

If a member of the Management Board intends to accept a position as a member of the Supervisory Board/Management Board or as a director of companies outside the Group, the prior approval of the Supervisory Board is required.

The prior approval of the Supervisory Board of Raiffeisen Bank Romania is also required in case the members of the management bodies intend to engage in other activities on their own account or on behalf of a third party or to associate with another company as a partner/manager. Appointment to the aforementioned positions shall be made with the prior approval of the Compliance Department.

The Compliance Directorate acts as the function responsible for assessing possible conflicts of interest in relation to members of the governing bodies. The Supervisory Board of Raiffeisen Bank Romania acts as the final decision maker and the one who assumes the implicit risks resulting from the implementation of the proposed mitigation measures (and/or the residual risks that may be accepted related to the respective conflict of interest).

In 2023, the Bank registered 555 complaints from employees/ partners regarding potential conflicts of interest at the company level. Based on the complaints received, the Bank conducted specific internal assessments and took measures to manage and monitor conflicts of interest in line with the internal regulatory and legislative framework. Of the 555 referrals, 20 were confirmed.

Anti-corruption and anti-fraud policy

Raiffeisen Bank Romania (RBRO) a policy of "zero tolerance" when it comes to illegal or unethical business behaviors such as fraud, bribery and corruption. In RBRO, the anti-corruption activity is managed by the Compliance Directorate, through the Investigations, Anti-Fraud, Anticorruption and Financial Services Department and aims at the following aspects:

- Promoting high standards of ethical and moral conduct within the Bank, based on compliance with legislation, local regulations, standards imposed by the RBI Group and internal procedures and implementation of applicable legislation;
- Implementing the legislation in force and the group standard on preventing and combating corruption and bribery and monitoring their compliance.

The Bank's activity in preventing and combating corruption, fraud, and bribery is governed by the Anti-Corruption and Anti-Bribery Procedure (ABC), revised in January 2023, and an Anti-Fraud Policy, updated in February 2022.

Corruption and bribery can take many forms, including the offer or acceptance of direct or indirect payments, excessive gifts, donations, sponsorships, preferential payments, or facilitation of services. Employees are permitted to accept or offer gifts and entertainment that are appropriate to the position only under certain circumstances, subject to limitations, approvals, and registration requirements defined in the Bank's internal rules, but are strictly prohibited from offering or receiving cash or equivalent gifts.

In 2023, RBRO assessed corruption risks in Romanian operations across 4 dimensions:

- Failure to report/manage conflicts of interest
- Bribery of external parties by bank employees
- Bribery of bank employees by external parties
- Economic extortion by employees

All these risks were assessed as low, given the data reported in previous years and the following measures taken by the bank:

- RBRO has implemented local regulations and the RBI Group Anti-Corruption Standard (Compliance Handbook, Ethics Rules, Anti-Corruption Procedure, Whistleblowing Policy, Conflict of Interest Management Policy for Financial Instruments, etc.);
- Implementing each employee's obligation to disclose potential conflicts of interest;
- Implementation of verification procedures, in terms of compliance and conflicts of interest, for each external candidate for a position associated with a grade greater than or equal to ten (in the recruitment process) or internal (in the process of internal relocation – promotion, return from CIC, lateral moves involving coordination functions and change of direct superior);
- Implementing validation procedures, in terms of compliance and conflicts of interest, for each external candidate (in the recruitment process) or internal candidate (undergoing internal transfer - promotion);
- Mandatory completion of courses on compliance requirements by all bank employees;
- Implementation of compliance and conflict of interest screening procedures for all private individuals and legal entities the Bank intends to do business with (suppliers, consultants, etc.);
- Implementation of compliance and conflict of interest screening procedures for all requests for sponsorship and/or charitable actions.
- Key controls of activities with a high risk of corruption: Procurement, Sponsorship & Donations, Recruitment.

At the same time, during 2023, 30 anti-fraud and anticorruption reports were sent to the network/headquarters, of which 1 referred to conflict of interest and 29 pointed out anti-fraud aspects.

In 2023, 9 information notices were sent in the monthly newsletter (2 related to anti-corruption, anti-bribery and conflicts of interest and 7 related to anti-fraud) on the obligation to comply with the rules of ethics and conduct.

In addition to the mandatory courses on Antifraud and Anticorruption, all bank employees have the obligation to read, complete and sign the declaration of compliance confirming their knowledge of the obligations they must comply with in terms of internal and legal regulations.

In 2023, 100% of the bank's new suppliers were informed about anti-corruption policies and procedures. All new suppliers must confirm that they understand and agree to anti-corruption policies as part of the process of starting the collaboration with the bank.

In 2023, 100% of our employees were informed about anti-corruption policies and procedures, and 99.29% of employees were trained on anti-corruption policies and procedures.

In 2023, there were not:

- Confirmed incidents of corruption;
- Confirmed incidents leading to the dismissal or disciplinary sanction of employees for corruption;
- Confirmed incidents leading to termination or interruption of employment due to corruption;
- Legal actions/public proceedings against the organization or its employees, based on corruption allegations.

Anti-competitive behavior

The Bank complies with the rules of fair competition and the rules governing market conduct at national and international levels as an important prerequisite for sustainable development.

The Bank is committed to promoting and upholding honest and legally compliant behavior in the field of competition, encouraging an effective competitive environment in the financial-banking sector, and is committed to this end to ensure compliance with competition rules within the Bank. Compliance with competition rules is an important and ongoing concern within the Bank.

The competition rules provide for two fundamental proscriptions, both of which can be embodied in seemingly unilateral conduct and cartel agreements:

- Prohibition of any anti-competitive agreements, decisions of associations, or concerted practices;
- Prohibition of abuse of a dominant position held by an enterprise or group of enterprises.

Compliance with competition rules is the responsibility of each bank employee.

In 2023, there was no legal action targeting the Bank's anti-competitive conduct or violations of anti-trust and monopoly laws, in which the organization was identified as a participant.

Political contributions

In accordance with ethical principles and its sponsorship policy, the Bank does not make direct or indirect political contributions, nor does it provide sponsorship in cash or in-kind to political parties or politicians.

Know-your-client policy anti money laundering/ terrorist financing prevention

The policy aims to establish a general framework for the effective conduct of Know Your Customer (KYC) and anti-money laundering/ countering the financing of terrorism (AML/CFST) activities to ensure proper management of money laundering/ terrorist financing risk, compliance with legislative, regulatory and Group requirements, ensure compliance with prudent, sound practices and prevent the Bank from being intentionally or unintentionally used to conduct illicit activities by its customers.

The policy sets out the overall framework for the governance, identification, assessment, monitoring, mitigation, and reporting of money laundering/ terrorist financing risk associated with the Bank's activities, including in relation to the development of new products/ services/ activities or significant changes to current ones, and for ensuring an organizational risk culture.

In Raiffeisen Bank Romania, the Compliance Officer designated at the Senior Management level is responsible for coordinating the implementation of internal policies and procedures for the application of Law 129/2019 as amended and supplemented for the prevention and combating of money laundering, as well as for the amendment and completion of certain regulatory acts, and is represented by the person holding the position of Chairman of the Management Board.

Responsibility for the establishment and implementation of the organizational framework aimed at preventing money laundering lies with the Compliance Directorate, headed by the Director of the Compliance Directorate, who also holds the position of Compliance Officer. The Bank has implemented appropriate monitoring tools and IT applications to ensure effective AML/CFT activity, using appropriate parameters defined based on national and international standards and in accordance with instructions issued by the National Office for Preventing and Combating Money Laundering. Specific scenarios and alerts are defined and implemented as additional monitoring tools to identify unusual transactions on customer accounts.

The Bank has established appropriate internal procedures that promote high standards of customer knowledge and defined key elements in relation to, among others:

- Rules for accepting clients;
- Know-your-client (KYC) measures);
- The process to identify and verify client identity;
- Risk-based customer assessment;
- Establishing, implementing, and maintaining internal regulations and controls to ensure ML&TF risk mitigation;
- Monitoring customers and transactions throughout the business relationship;
- Periodic updating of the information held about the client and permanent updating of the records drawn up at the beginning of the relationship with the client, as well as their verification, etc.

The Bank does not open and operate anonymous accounts or accounts with fictitious names for which the identity of the holder is not known and properly declared. The Bank ensures that employees are regularly trained regarding the relevant legal provisions on customer due diligence, prevention of and fight against money laundering, as well as relevant personal data protection requirements.

The main purpose of the training programs is to develop the skills of the Bank's employees, promote high ethical and professional standards, prevent the Bank from being used for illicit activities, and ensure that banking is conducted in compliance with legal and regulatory requirements. The Bank will continuously conduct KYC/ AML training programs to prevent money laundering/ terrorist financing so that responsible personnel are properly trained. The information is available to all Bank employees on the Money Laundering Prevention and Control/Compliance Department intranet page.

Human rights

The Bank supports the protection of human rights stipulated in the European Convention on Human Rights as well as in the Universal Declaration of Human Rights.

The Bank undertakes not to engage in business that does not comply with these principles, not to directly or indirectly finance any transactions, projects, or parties, or cooperate with any business partner (client, supplier) that does not comply with these standards or is alleged to have violated human rights.

As part of the Raiffeisen Group, a signatory to the United Nations Global Compact, we are committed to consistently comply with the ten responsible business principles, two of which are directly aimed at respecting fundamental human rights: businesses should support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

The Code of Conduct reinforces the Bank's alignment with the principles of respect for human rights. Raiffeisen Bank aims to actively promote a culture of respect for human rights.

During the reporting period, training sessions were conducted on the Bank's policies and procedures in the field of human rights, thus 4,791 employees completed a total of 11,325 hours of training. In addition, 4,856 employees completed a total of 1,369 hours of training on the diversity and inclusion pillars.

1.6 Information security and data protection

In its activity, Raiffeisen Bank pays maximum attention to the security of the apps and services offered, having as main objective to ensure a safe and reliable banking experience for each user. In this regard, we are continuously working on improving security systems and implementing the latest available technologies.

Our top priority is to protect our customers against any form of cyberattacks. Through the protection measures we apply, we strictly comply with both national regulations on information security and European legislative frameworks.

During 2023, the number of fraud attempts against customers has seen an upward trend and their methods are more complex, so it is important to always be vigilant and informed about the new tactics.

We constantly provide customers with information to help them protect themselves against existing risks, especially when using online services. We offer in the mobile application and on the Bank's website a dedicated section presenting the measures we take for the safety of their activities, as well as useful tips and steps to follow to avoid being victims of fraud.

Protection of personal data

Information security threats and personal data protection, however, are aspects that can generate negative impact in the absence of implementing strong measures and practices to ensure the protection of electronic networks and devices against attacks and damage caused by any unauthorized access.

The protection of personal data is a continuous concern for Raiffeisen Bank Romania. 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. The purpose of these steps is the desire for continuous improvement in the field of data security and customer service. At the company level, there are internal policies and procedures that regulate how the confidentiality and data security of any data subject is ensured.

In order to ensure compliance with the applicable legislation, the Bank has appointed a Data Protection Officer ("DPO"), establishing the obligation to consult him for all aspects related to the protection of personal data, including:

- Advising internal rules and procedures, including any changes with an impact on the processing and protection of personal data
- Design of new flows/processes/services or banking products/operations involving the processing and protection of personal data
- Ensuring compliance with the rights of the individuals concerned and/or complaints regarding the Bank's compliance with the legal provisions on personal data protection
- Carrying out any impact analysis in the field of personal data processing and protection
- Investigation of any security incident with impact on the processing and protection of personal data.

Information regarding the processing of personal data by the Bank can be consulted at any time on the page dedicated to our Policy on personal data processing and data confidentiality, <https://www.raiffeisen.ro/despre->

noi/politica-de-confidentialitate/, customers also having the opportunity to ask questions to the DPO by sending a message to the dpo@raiffeisen.ro.

The specific control activities regarding the protection of personal data are carried out in accordance with the provisions and recommendations included in the general data protection governance framework, in accordance with the regulations issued by the Group on the strategy and governance of personal data and takes into account principles, policies and standards accepted at the level of the organization. They comply with the principles and rules applicable to the processing of personal data carried out by Raiffeisen Bank, by establishing the requirements to be observed by Raiffeisen Bank employees when processing personal data in the performance of their job duties (including in the context of human resources activities).

In 2023, 29 incidents of unauthorized disclosures of personal data were identified, which were generated by operational errors regarding the transmission of personal data and / or the performance of personal data processing operations without the prior express consent of the individuals concerned.

At the same time, in 2023, there were 10 pending legal actions and 9 actions concluded with final court decisions, regarding alleged violations of the legislation on the processing of personal data, which concerned aspects related to data processing through filing systems such as Credit Bureaus.

1.7. Risk management

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

The risk management function is independent of the commercial one and focuses on the management and control of the following risks: credit risk, market risk, liquidity risk, operational risk, reputational risk.

The Management Board has overall responsibility for the establishment and oversight of the Bank's risk management framework. In this respect, it established the Assets & Liabilities Committee (ALCO), Credit Committee, Problem Loans Committee and Risk 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 analyze 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 the 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, Raiffeisen Bank reports the Leverage Ratio, the Liquidity Cover Ratio and Net Stable Funding Ratio to the National Bank of Romania (NBR).

In 2014, the Bank also completed the implementation and reporting of the European Banking Authority (EBA) standards concerning forbearance and non-performing exposures. Since 2015, the Bank also applies the NBR and EBA regulations on recovery and resolution, and since 2018, it applies IFRS 9 provisions.

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

The Bank is currently developing and implementing tools to identify, measure and manage social and environmental risk.

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 explains them. Based on these signs, customer portfolio is split into risk groups and actions/strategies are proposed for the customers considered problematic.

Raiffeisen Bank S.A. received NBR's approval to determine the capital requirement for credit risk according to internal rating-based (IRB) models approach starting 2009, July 1st.

As regards the retail portfolio, Raiffeisen Bank received NBR's approval to determine the capital requirement for credit risk according to advanced internal rating-based models approach (AIRB) starting 2013, December 1st.

Market risk

Regarding market risk, the Bank currently uses the standard approach for capital requirement calculation. The market risk management is currently implemented through a market risk limits and warning levels 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.

Liquidity risk

The Management Board defines the liquidity risk strategy based on recommendations made by the units responsible for liquidity and funding management in cooperation with the area responsible for monitoring and controlling of liquidity risk.

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

Operational risk

Starting with January 1st, 2010, Raiffeisen Bank determines and reports the capital requirement for operational risk using the standard approach that was approved by the National Bank of Romania in November 2009.

This approval was based on the operational risk management framework developed by Raiffeisen Bank by implementing an operational risk management model based on three defense lines and on certain advanced tools, such as: operational risk incidents database, operational risk indicators, risk scenarios, risk assessment matrix. Both the operational risk management tools and processes are continuously improved, being aligned with the operational risk management framework implemented at the Group level.

Reputational risk

Within the Bank, reputational risk management 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 describes the roles and responsibilities regarding reputational risk, and also the tools used to ensure proper management and control of this risk.

Tools used for assessing and managing reputational risk:

- Reputational risk indicators (indicators that measure the perception and behavior of the customers – i.e., number of complaints; indicators that measure the public perception in the mass media; and indicators reflecting the relationship with government authorities);
- Collecting and reporting of reputational risk events, which are managed using specific flows and actions;
- Assessment of reputational risk as part of the Bank's risk profile.

Reputational risk is a priority for the Bank, therefore we continuously focus to improve the management process, especially in terms of raising all the employees' level of awareness through specialized training programs, but also to periodically review the specific reputational risk indicators, taking into account changes in both the Bank's strategy and the external environment.

Workforce risks

Creating and maintaining jobs is a central concern for the Bank, as they have an indirect impact on security, stability, and prosperity in society. This must be weighed against the need to automate some operations to provide competitive and customer-friendly services, by including an increasing number of digital products. These changes require new skills and experiences from employees, and the need for transformation places training and professional development as an essential activity embedded in workflows and processes.

At the same time, change can lead to uncertainty and anxiety. The potential risks of stress and sedentary office work have been addressed through a variety of provisions and opportunities in the areas of healthcare, personal well-being, and sports. At the same time, given the context we faced during 2020-2022, we saw an opportunity to continue remote work to positively influence the work-life balance of our employees.

At the same time, we recognize diversity, inclusion, and equal opportunities as key aspects of our employer status, and we are aware that we must be a role model for other economic actors in the Bank's ecosystem. All this, together with the training and professional and personal development programs we implement, allows our team to access and grow their potential. In doing so, we contribute to increasing employee motivation and reducing the risks generated by staff turnover, improving retention.

Environmental and social risk in lending policy

Raiffeisen Bank Romania has been applying ESG (Environment, Social, Governance) risk management principles since 2014, when the Social and Environmental Risk Policy was developed and implemented.

The basic principles of the policy are:

- Financing those projects that are environmentally and socially viable and sustainable in the long term;
- Minimizing environmental and social risk for both the bank and our partners (customers and/or suppliers);
- Compliance with national and international requirements and standards regarding environmental and social risks.

At the corporate client level, an ESG score has been developed for clients by measuring the impact of ESG-related risks through individual scores.

Regular reviews are carried out for loans to bank customers, including from an ESG perspective. Clients are asked to inform the Bank as soon as they have significant disputes or incidents related to ESG issues.

2. Our responsibility to the economy

2.1. Materiality analysis

Raiffeisen Romania recognizes the value of the materiality analysis in sustainability reporting. This analysis consists of identifying the material topics underlying non-financial reporting. Material topics are those topics that reflect the impact (positive and negative) generated by the Bank's activities and business relationships on the economy, society, and the environment, including human rights.

Through the materiality analysis process, Raiffeisen Bank Romania is achieving two key goals. First, it allows the identification of non-financial indicators that are included in the sustainability report. Secondly, this analysis helps us gain a deeper understanding of the risks and opportunities that arise from an ESG perspective, and this understanding allows the Bank to improve its stakeholder engagement and communication processes, fostering transparency, trust, and accountability.

For this reporting exercise, we have used the results of the materiality analysis conducted between January and February 2023

The materiality analysis was based on identifying potentially material topics, i.e. those topics on which Raiffeisen Romania, through its business activities and relationships, could generate an impact (positive and/or negative) from an economic, social, and environmental point of view, including from a human rights perspective. The list of potential material topics was designed based on an analysis of the Bank's business and business relationships, the latest studies/reports on sustainability trends, the national and European legislative context (CSRD, SFDR, EU Taxonomy), as well as industry best practices and other sustainability reporting standards such as Sustainability Accounting Standards Board (SASB), Task Force on Climate-related Financial Disclosures (TCFD), draft European Sustainability Reporting Standards (ESRS).

The materiality analysis process was carried out in line with the requirements of GRI Standard 3. Thus, in order to ensure that no potentially material issues were omitted and to validate the significance threshold set, we conducted

a consultation/validation process with experts in the field in April 2023. This meeting was attended by 9 sustainability experts from various fields such as responsible investment, circularity, community investment and sustainable development. The meeting was moderated by a third party and, as a result of the meeting, no new areas/fields were identified where the Bank could generate/generates, through its business activity and relationships, a significant impact (positive or negative) on the environment, society and the economy.

The responses received were centralised and analysed, resulting in the following material themes:

Economic and governance topics

- Impact on the local economy
- Business ethics and responsibility
- Environmental risk management, including climate-related risks
- Environmental impact through lending policy
- Digitalization, information security, and data protection
- Supplier relations
- Sustainable lending

Social topics

- Inclusion and access to financial services and products
- Stakeholder transparency
- Fair working environment
- Financial education
- Volunteering and community investment

Environmental topics

- Tackling climate change
- Responsible resource consumption

2.2. Affiliations

Association/ Organisation	The company holds a position in the management structures	The company offers Substantial funding beyond membership fees	The company considers membership in this organization to be strategic
Employers' associations			
The Council of Banking Employers in Romania (CPBR)	Zdenek Romanek, Member of the CPBR Board of Directors	No	Yes
Employers' Confederation "Concordia" (CPC)	No	No	Yes
Financial Services Employers Federation	No	No	Yes
Banking associations			

Romanian Association of Banks (RAB)	Mircea Busuioceanu, member in the Board of Directors	Yes	Yes
Romanian Association for Electronic Payments (APER0)	No	No	Yes
Romanian Factoring Association (ARF)	Cristina Kalinov, member in the Board of Directors ARF	No	Yes
Fund Managers Association (AAF)	No	No	Yes
Credit Bureau	Vladimir Nikolov Kalinov, member of the Board of Directors	No	Yes
Turnaround Management Association (TMA)	Mircea Busuioceanu, founding member	No	Yes
Business associations			
The Coalition for the Development of Romania (CDR)	Cristian Sporiş, CDR Steering Committee Member	No	Yes
Foreign Investors Council (FIC)	No	No	Yes
Romanian Business Leaders	No	Yes	Yes
Austrian Business Club Bucharest	No	Yes	Yes
Aspen Institute Romania (ASPEN)	Cristian Sporiş, Member of Board of Directors	Yes	Yes
Romania Green Building Council (RoGBC)	No	No	Yes
Chambers of Commerce			
American Chamber of Commerce in Romania (AmCham)	Cristian Sporis, President	Yes	Yes
Switzerland-Romania Chamber of Commerce	No	No	Yes
German-Romanian Chamber of Commerce (AHK)	No	No	Yes
Netherlands-Romanian Chamber of Commerce (NRCC)	No	Yes	Yes
German Economic Club Association (DWK)	No	No	Yes
Other partnerships with non-governmental organizations			
United Way	Zdenek Romanek, Board member	Yes	Yes
Green Revolution	Cristian Sporis, member of the Board of Directors	Yes	Yes
Romanian Diversity Chamber of Commerce	Alina Rus, member of the Board of Directors	No	Yes
Junior Achievement Romania	Bogdan Popa, member of the Board of Directors	Yes	Yes

Sustainable Romania Coalition	No	No	Yes

Since 2010, the Group has joined the world's largest social responsibility and sustainability initiative, the United Nations Global Compact. As such, we are committed to upholding and promoting the ten principles of the UNGC:

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor.

Principle 5: Businesses should uphold the effective abolition of child labor.

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

We also support and contribute to the achievement of the goals set by the 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, which includes 17 Sustainable Development Goals (SDGs) and 169 related targets and provides a common blueprint for peace and prosperity for people and planet, now and in the future.

In January 2021, Raiffeisen Bank International became a signatory to the UN Principles for Responsible Banking, a unique framework for a sustainable banking industry developed through a partnership between banks around the world and the United Nations Environment Finance Initiative (UNEP FI).

2.3. Sustainable lending

Sustainable lending continued to be a key aspect in 2023, both from the local perspective of Raiffeisen Bank Romania and at RBI Group level.

2.3.1 Sustainable lending for retail customers

We want to offer our individual customers products and services tailored to their needs, but at the same time contributing to the global goal of transition to a sustainable economy.

“Casa ta verde”

In terms of environmental impact, eco-homes help reduce carbon emissions, not only during construction but throughout their lifetime. We continue to encourage customers to apply for these green loans and stimulate these loans by offering a reduction in interest rates so that we achieve a positive and measurable impact on the environment. **In 2023, approximately 40% of mortgage loans were granted to financing buildings with energy performance class A (Green Mortgage).**

2.3.2 Sustainable lending for corporate clients

We want to support the transition of the Romanian economy to a sustainable economy, to create the premises for understanding, development and acceleration towards the European target "Net zero". Our actions converge to provide financing solutions that support and provide financial incentives for green finance. At the same time, we identify the need of corporate clients to understand and assimilate the changes generated in the business environment by introducing norms and regulations derived from the transition to a sustainable economy. In this regard, we have maintained the objective of having meetings focused on ESG topics with Corporate clients, reaching out to our clients in order to collaborate and support the achievement of their sustainability goals. We address corporate clients with customized products and services with an ESG component, and the green finance categories addressed in 2023 targeted:

- Green buildings;
- Transport ecologic;
- Circular economy;
- Renewable energy.

In order to identify sustainable transactions, RBI's ESG Regulation was completed and developed. The internal guide covers both dimensions – customer and commercial transaction – and focuses on correctly defining the greenwashing phenomenon in order to avoid it. The conditions and framing flow were made based on RBI Rules (RBI ESG Rulebook) and on the Working Procedure of Corporate Credit Applications.

As of December 31, 2023, the total value of the green product portfolio in the Corporate portfolio was EUR 508 million, resulting from 441 transactions.

Products for SME customers

Term Loan Invest (TLI - ESG)

TLI is intended to finance ESG projects in the renewable energy category, having as purpose the production of electricity using solar energy, which contributes to the sustainable development of the SME client's business. Within the Bank, there is a rule and procedure by which these loans are assessed for compliance with the requirements of the EU Taxonomy.

TLI Credit focuses on:

- Electricity production equipment using solar energy (photovoltaics);
- Integrated solutions for green energy production financed as a whole (batteries, installation works, transport installations).

The purpose of the loan is to transform the SME company into a "prosumer" (according to the legal definition - equipment producing max.400 KW), which optimizes its expenses generated by energy consumption for its own needs. There is also the option for the customer to remain in self-consumption.

In 2023, 25 TLI Photovoltaic loans worth €1.6 million were granted.

The Bank has also launched a support instrument, a dedicated platform, where prosumer SMEs can gain easy access to relevant and reliable information about photovoltaic systems, connect directly with experts and access favourable financing conditions for green loans. In 2023, SME Green Solutions Platform had 26,000 unique users.

Term Loan Capital Agribio (TLC)

In 2022, the Bank launched TLC Agribio, its first lending product aimed at encouraging and supporting sustainable agriculture through. This is another important step in supporting the entire ecosystem necessary for sustainable development in Romania. The loan is intended to finance the short/medium term needs of the purchase of raw materials/materials necessary for the establishment/maintenance of agricultural crops or vegetable/fruit crops. In the case of mixed farms (with both organic and conventional farming), the financing request will be approved in the loan application through 2 distinct facilities, one for organic farming and the other for conventional agriculture. The customer has the contractual obligation to keep in organic production the certified areas for which financing was requested, throughout the credit period.

Green and sustainability bonds

Raiffeisen Bank was the first bank in Romania to issue green bonds, and in 2022, the Sustainable Bond Framework was adopted, through which the bank allocates the funds raised through green bond and sustainability issues to sustainable projects, aligned with our sustainability strategy - green buildings, renewable energy projects, energy efficiency, transport and organic agriculture, pollution prevention and control projects, circular economy, sustainable agriculture, but also social projects – access to essential health services, education and infrastructure, affordable housing and financing of small and medium-sized enterprises in underdeveloped regions at national level. The Sustainable Bond Framework was assessed by the ESG (Environment, Social and Governance) rating agency, Sustainalytics, which confirmed the credibility and positive environmental impact of eligible projects defined in the Framework, as well as its alignment with the highest market standards (ICMA Principles for Sustainable, Green and

Social Bonds). In total, in the last 3 years, Raiffeisen Bank Romania has issued green and sustainability bonds worth approximately EUR 1.

Partnerships for sustainability

In 2023, Raiffeisen Bank continued its successful partnership with the EIB Group by signing three new guarantee agreements, through which the bank will support small and medium-sized enterprises (SMEs) to strengthen their resilience, competitiveness and contribution to the green transition. The new guarantee agreements will support loans of more than €650 million to SMEs over the next few years under more favourable financing conditions. Another important partnership was with the European Investment Fund (EIF), which granted Raiffeisen Bank Romania two guarantee schemes worth EUR 400 million to finance investments made by SMEs on the local market.

3. Our responsibility to society

3.1 Fair working environment

Through our human resources policies and programs, such as recruitment, compensation, retention, diversity and equal opportunities, anti-discrimination and human rights, training and professional development, the right to freedom of association and collective bargaining, or employee health and safety norms, we create a fair working environment where all our employees can feel valued and respected. Such policies have an impact not only on employee wellbeing, but also on society as a whole and on company performance.

We want our employees to feel good and be happy so that we, as an organization, can provide customers with the best financial expertise and top-notch digital solutions.

In 2023, our team consisted of 4,906 employees, 3,666 of whom were women, and 1,240 men.

Classification of employees, according to the work norm			
2023	Women	Men	Total
Full time	3,578	1,213	4,791
Part-time (<8h)	88	27	115
Total employees	3,666	1,240	4,906

Classification of employees, depending on the type of employment contract		
2023	Women	Men
Permanent	3,570	1,198
Fixed-term	96	42
Total employees	3,666	1,240

Employee turnover

Employee turnover				
Categories	New employees		Employees who left the company	
	Number	Percentage of average* of employees	Number	Percentage of average* employees
Gen				
Women	495	9,97%	618	12,45%
Men	240	4,83%	205	4,12%
Total	735	14,80%	823	16,57
Age group				
<30	423	8,52%	369	7,43%
30 - 50	300	6,04%	383	7,71%
>50	12	0,24%	71	1,43%
Total	735	14,80%	823	16,57%
Workstation				
Head Office	422	8,50%	397	7,99%
Network/Branches	313	6,30%	426	8,58%
Total	735	14,80%	823	16,57%

*average number of employees within Raiffeisen Bank Romania in 2023 = 4,965

Diversity and equal opportunities

Since 2018, through our workplace diversity policy, we have been ensuring that all our employees are given equal opportunities, while creating opportunities for groups that may be disadvantaged. Promoting and adopting diversity issues is part of Raiffeisen Bank Romania's social responsibility.

The aim of our policy is to attract, retain and inspire employees with a wide range of talents, fostering a culture that reflects our core values. This approach is designed to stimulate innovation and creativity, encourage critical thinking and cultivate a vibrant atmosphere that improves both performance and well-being. In addition, it aims to increase employee engagement and satisfaction. Just as important, our policy aims to strengthen the bond between our employees and the community we support.

At the end of 2019, a Diversity and Inclusion Officer was appointed within Raiffeisen Bank Romania, to act as a central point of contact for diversity management. She is working closely with relevant stakeholders to facilitate local implementation of diversity policies and strategies, in line with the Group's overall strategy. Because we strongly believe that diversity plays an important role both in a company's performance and in the well-being of society as a whole, we became signatories of the Diversity Charter in 2018, publicly pledging to respect and promote values such as equal opportunities, anti-discrimination and social inclusion. Through this commitment, we are connected to the European Platform of Diversity Charters, a reference body on good practices and resources for diversity management.

We strongly believe that diversity, including gender, is important to ensure a variety of opinions, experiences and perspectives that facilitate sound and inclusive decisions. In 2023, we conducted a dedicated Diversity and Inclusion survey across the organization. We took the pulse of diversity and perceived inclusion in the organization to reflect the valuable insights received through the survey into diversity management policy and strategy.

Our commitment to zero tolerance for discrimination and harassment is a firm one, and for any complaint or grievance of discrimination, employees are trained to use the email address: salariati.sesizari@raiffeisen.ro.

In 2023, there were no incidents of discrimination or harassment within Raiffeisen Bank Romania.

Diversity among employees, as of December 31, 2023

Employee category	Women				Men			
	<30	30-50	>50	Total	<30	30-50	>50	Total
B-1*	0 0%	9 0,18%	11 0,22%	20 0,40%	0 0%	20 0,40%	2 0,04%	22 0,44%
B-2**	1 0,02%	72 1,46%	17 0,34%	90 1,83%	0 0%	60 1,22%	6 0,12%	66 1,34%
Other management positions	9 0,18%	188 3,83%	58 1,18%	255 5,19%	5 0,10%	77 1,56%	11 0,22%	93 1,89%
Specialists	921 18,77%	1,949 39,72%	431 8,78%	3,301 67,28%	333 6,78%	631 12,86%	95 1,93%	1,059 21,58%
Total	931 18,97%	2,218 45,20%	517 10,53%	3,666 74,72%	338 6,88%	788 16,06%	114 2,32%	1,240 25,28%

*B-1 (Board-1) represents the first level of management, after Top-management/Directorate. Information about the structure of the Executive Board is included in the Corporate Governance section.

**B-2 (Board-2) is the second level of management, after Top-management/Directorate.

Note: The percentages were calculated relative to the total number of employees as of December 31, 2023 (4,906 people)

In 2023, 55.55% of management positions (B-1 and B-2) within Raiffeisen Bank Romania were held by women, the share of their representation increasing by over 3% compared to the previous year.

In 2023, the average age at Raiffeisen Bank Romania was 37.6 years.

Number of employees with disabilities

Employee category	2023		2022		2021	
	Women	Men	Women	Men	Women	Men
Other management positions	2	1	1	1	1	1
Specialists	20	8	16	7	11	6
Total	22	9	17	8	12	7

Remuneration and benefits policy

The Raiffeisen Bank S.A. remuneration system promotes fair and efficient risk management and does not encourage assuming risks over the tolerated levels. This is in line with the Bank's business strategy, goals, values, and interests and it incorporates measures to avoid conflict of interest.

The Raiffeisen Bank S.A. remuneration policies are approved by the Bank's Supervisory Board through the Remuneration Committee.

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

1. The compensation system supports the company's long-term business strategy and goals, its interests, and values by using the set of key performance indicators (KPI) of RBI and the key cultural competences.
2. The principles of compensation incorporate measures to avoid conflicts of interest.
3. The compensation policy and principles are in accordance with and 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).
4. Compensation is based on a functional structure and is linked to performance. Besides, special rules are applied to the personnel whose professional activity has a material impact on the risk profile.
5. Compensation is competitive, sustainable and reasonable, and it is defined in accordance with the relative value of work, market, and practice.
6. Fixed compensation is defined, in principle, in accordance with the market conditions.
7. The compensation structure (the variable payment proportion relative to fixed compensation) is balanced, which allows each employee to have an adequate level of remuneration based on the fixed salary.
8. All variable payment programs include minimum levels of performance and a maximum payment threshold.

9. Individual performance is the product of the 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.

10. The personnel employed in controlling functions is compensated independently from the business unit they supervise, has appropriate authority and their remuneration is determined on the basis of achieving their own goals without taking into consideration the results of the area they monitor. The fixed and variable remuneration structure should be in favor of the fixed remuneration.

If an employee is paid a variable compensation, this is done for measured performance. Performance is translated into results and behavior: "what" and "how", according to the performance management system. Therefore, all variable compensation structures are linked to performance management or a comparative system of setting the targets.

The ratio between the minimum wage for employment in the company and the minimum wage regulated at national level*, in 2023	Women	Men
	1,45	1,45

* The nationally regulated minimum wage of 3,300 lei was taken into account.

2023	Basic salary ratio between women and men	Gender pay ratio
B-1*	0,95	0,95
B-2**	0,97	0,97
Other management positions	1,01	1,01
Specialists	0,98	0,98

*B-1 (Board-1) represents the first level of management, after Top-management/Directorate. Information about the structure of the Executive Board is included in the Corporate Governance section.

**B-2 (Board-2) is the second level of management, after Top-management/Directorate

Both full-time and part-time employees receive the same benefits (eg medical subscription, retirement benefits, additional rest days, optional pension, meal vouchers, etc.), which are regulated by the Remuneration Policy and the Collective Labour Agreement.

All Bank employees (100%) benefit from the provisions of the Collective Labour Agreement.

The value of the benefits package as % of salary	2023	2022	2021
Specialists	8,4	6,8	6,8
Management	4,6	3,5	3,5
Top Management	1,8	1,4	1,4

Parental leave	2023	
	Men	Women
Number of employees who had the right to parental leave	1,240	3,666
Number of employees who have taken parental leave	3	344
Number of employees who returned to work (in 2023) after the end of parental leave	8	152
Number of employees who returned to work (in 2022) after the end of parental leave and were still employed after 12 months (in 2023)	5	108
Return to work rate	100%	74%
Retention	63%	86%

Professional development

Employee training and development is one of the strategic human resources directions through which Raiffeisen Bank aims to contribute directly to the performance of individual employees, their team, and, implicitly, to the performance of the organization.

During 2023, 4903 colleagues attended at least one training course, with an average number of training days per employee of 5,95.

In 2023, employee training was done online, through webinars, but also in physical format, through classroom courses, both by external providers and internal Bank trainers. In 2023 we ran development programmes derived from the organisation's strategy and aligned to the organisational culture. These aimed to strengthen both functional and leadership skills of employees and to increase employee engagement. The programmes supported were aimed at all employees in the organisation, both in the business segments and in the support areas, in order to increase the professional skills of the entire Raiffeisen Bank team.

The learning and development channels and tools we have made available to employees are varied: from technical courses and cross-cutting skills development programmes to certifications, conferences or workshops. In developing and delivering programmes we have aimed to support and facilitate the learning and education process of employees by providing quality content and using modern methods. We continued to optimise teaching methods and supporting technologies: experiential learning, interactive platforms and gamification techniques.

An important resource for development and continuous learning is the Hive. The content of the two existing categories, the Digital Academy and the Mortgage Academy, has been updated and enriched with new material, with a focus on diversifying content dedicated to training and improving the level of knowledge for the most appropriate advice to our clients

The Digital Academy is aimed at colleagues in branches, where relevant content about products and services available through digital channels is always at their fingertips. This way, they can better guide their customers in accessing and using them, facilitating the transition to digital banking. A total of 1558 colleagues (active as of December 2023) accessed and completed the modules available under this programme.

In 2023, we continued professional and leadership skills development programs for employees in central administration. The Leadership Growth Center program, attended by 121 colleagues, is addressed to managers, in order to support them in developing a set of critical skills in this role, such as:

- Internal negotiation
- conflict management
- Communication and empathy
- Performance evaluation and goal setting

Average number of hours of training per year per employee, by category						
Employees categories	2023		2022		2021	
	Men	Women	Men	Women	Men	Women
B-1*	108,08	121,66	51,71	35,72	54,68	66,80
B-2**	57,55	43,43	20,06	21,02	37,86	42,59
Other management positions	40,86	45,32	39,48	37,91	40,41	50,14
Specialists	36,12	50,41	36,53	53,20	40,46	61,38
Average number of hours of training	39,40	50,30	36,49	51,46	40,58	60,26

*B-1 (Board-1) represents the first level of management, after top-management/directorate.

Examples of training sessions offered to employees, depending on the topic of the session (in hours)	2023
Code of Conduct	11.325
Pillars of diversity and inclusion	1.369
Mortgage Academy	2.934
Digital Academy	9.799
Udemy	4.676
Practical course on prospecting and approaching SME clients	1.256
Sales Skills	8.952
Personal Financial Planning	12.076
Leadership Growth Center	848

**B-2 (Board-2) is the second level of management, after top-management/Directorate

Performance Management objective: to increase employee satisfaction, increase productivity and improve organizational performance. Agile performance management is an approach to performance management that emphasizes continuous feedback, continuous improvement and flexibility. In terms of the annual review process, we support both employees and managers to ensure it is a collaborative and productive conversation.

Performance dialogues continued in 2023, with support of digital tools. As of 2023, we have an integrated performance management, learning and development platform that provides a more comprehensive and simplified approach to performance management, helping employees develop their skills.

Performance evaluation and career development plan		
2023	Women	Men
	No.	No.
B-1*	21	21
B-2**	83	67
Other management positions	268	105
Specialists	3,145	988
Total	3,517	1,181

*B-1 (Board-1) represents the first level of management, after top-management/directorate.

**B-2 (Board-2) is the second level of management, after top-management/Directorate

Within Raiffeisen Bank Romania, employees who have at least 3 months seniority in the company are eligible for performance evaluation. Thus, in 2023, 95.76% of our employees benefited from a performance evaluation and a career development plan.

Recruitment

The recruitment team completed 1,312 recruitments and selections in 2023 by identifying suitable candidates, both inside and outside the organization.

Senior management employees recruited from local communities, 2023	Number	%
	42	100

Senior management = positions in the Board-1 category, persons reporting directly to the members of the Executive Board (top management).

Local community = Romania (persons born in Romania or persons with Romanian citizenship) Location of significant operations = all operations of the Bank in Romania.

Youth programs

In 2023, 3 trainee management programmes were run in the following business areas: BI, IT and Data science. These internship programmes were aimed at co-opting talent and skills training. Candidates were early-stage students, future technology specialists for businesses and beyond in the IT Division.

Following the recruitment and selection process, a total of:

- 5 in the BI departments
- 15 in the IT department
- 7 in the Advanced Analytics department

Their training process consisted of both a buddy allocation (dedicated partner), training sessions (from service providers) and a team project, through which the young people had the opportunity to apply the notions they had acquired in the programme (learning by doing).

Management trainee programs, with assignments in different departments in the Bank, including non-IT areas, were implemented in 2023 to support the business with resources trained in specific specialties, which can be transferred to related teams when opportunities arise. Understanding the culture, the domain, involvement in projects ensured that new colleagues were quickly integrated and had the opportunity to have relevant input both during the learning process and later after transfer to specialist positions.

We continued the traineeships at headquarters level. These are aimed at students or Masters students who want to familiarize themselves with the spirit and culture of a multinational organization. During an internship, young people are introduced to the workflows of a banking entity.

3.1.1 Occupational health and safety

At the level of the organization, the occupational health and safety (OHS) management system is achieved through the conformity assessment of the OHS activity, i.e. through management involvement and employee consultation, through the OHS strategy, plans and procedures.

Our continued concern for Occupational Health and Safety coupled with our digitisation strategy has guided us towards automating the OHS training/testing process and electronic signature of training records.

The OHS management system was implemented in accordance with the Health and Safety Law no. 319/2006 and the Methodological Rules for the application of the legal provisions by Government Decision no. 1425/2006.

Within Raiffeisen Bank, there is an Internal Service for Occupational Health and Safety (OHS), which aims to ensure the best conditions in the work process, to protect life, physical and mental integrity, to preserve the health of employees or other persons participating in the work process.

Responsibilities of the internal service:

- Organizes and carries out the occupational health and safety activity;
- Elaborates and carries out the general induction training for the Bank's employees;
- Identifies the risks of work-related accidents and occupational disease and proposes measures to assess them (with the help of the occupational physician and healthcare providers);
- Keeps records of work-related accidents in the Bank's units, as well as of occupational diseases;
- Collaborates in the research, registration, and bookkeeping of work-related accidents at the Territorial Labor Inspectorates and at the General Labor Inspectorate;
- Prepares the documentation for complying with the legislation and norms regarding maternity protection;
- Collaborates in the development of rules, procedures, regulations, and instructions in the field of occupational health and safety and organizes first aid courses.
- Analyzes and evaluates the risks of accidents and occupational diseases. This is a crucial step in the overall OHS management process with regard to the strategy for selecting appropriate security measures, aiming at intrinsic prevention, choosing the optimal protection measures, and providing information on risks. Access to information is done through the e-learning platform: Compulsory courses – OHS training.

All employees are trained and have the obligation to carry out their activity in such a way as to not expose themselves or other people participating in the work process to the risk of injury or occupational disease. When a hazard is observed, the employee is trained and informed to strictly follow the next steps:

- Turn off the equipment and/or halt the activity;
- Evacuate the personnel from the danger zone;
- Notify specialized services and their superiors.

Ensuring access to information and communication of relevant information on occupational health and safety of employees is carried out via the Bank's Intranet/Division - President - OHS Team, as well as on a half-yearly basis via the e-Learning platform based on the established topics.

Employees can report dangerous situations concerning their safety in the workplace to the dedicated address: protectia.muncii@raiffeisen.ro.

The organization also has an Occupational Health and Safety Committee (OSHC) consisting of eight employee and eight employer representatives. The committee meets quarterly and whenever necessary. The designated employees, representatives of the internal prevention and protection service, and their representatives are invited to attend the meetings of the OSHC. Labor inspectors are also invited to attend. The President and the Secretary of the CSSM, in consultation with the workers' representatives, draw up the agenda of each meeting and send it to the members of the Committee and to the Territorial Labour Inspectorate at least 5 days before the date set for the Committee meeting.

The company's risks are identified through the method developed by the National Research and Development Institute for Occupational Safety (INCDPM): The method of assessing the risks of occupational injury and illness. The model developed within I.N.C.D.P.M, systematically addresses the causality of these events, allowing the development of a pragmatic tool to identify all risk factors in a system.

Workplace accidents happen most often through carelessness when employees are coming to or leaving the office - at pedestrian crossings, in traffic, when using public transport, or in office buildings due to slippery floors or going down the stairs.

In 2023, Raiffeisen Bank Romania recorded 12 work-related accidents. These were traffic or route accidents.

Work related accidents 2023	Number	
	Women	Men
Deaths caused by work-related accidents	0	0
Incidents with a high probability of causing serious injury (e.g. explosions, road accidents, etc.)	0	0
Injury rate due to work-related accidents	7	5

Only data on the Bank's employees were taken into account in the information presented. The Bank does not currently monitor occupational health and safety issues at the level of contractors working in the Bank's premises/agencies.

3.2 Volunteering and community investment

Raiffeisen Bank defines sponsorships as a community investment and therefore must be in line with the following 3 principles:

- are SMART investments: specific, measurable, realistic, relevant, time-bound
- are best practice projects
- have a positive impact on the quality of life of beneficiaries.

Our sponsorship policy aims to:

- ensure that education accounts for the largest share of the community investment budget
- provide support in increasing the fundraising and impact project implementation capacity of the company's community partners engage Raiffeisen Bank employees in volunteering in community projects supported by the Bank

Community investment

2023 represented for Raiffeisen Bank a year for growth and consolidation of community partnerships. In the last year, we have confronted with crisis situations, globally and regionally, and have determined us to react to the urgent needs of the Romanian community. We focused our attention on how we can respond, proactively and strategically, to the needs of Romanian communities and how we can mitigate future situations of social crisis.

Starting from our previous strategic directions, such as education, urban ecology or sport as a healthy lifestyle, we have reshaped the community involvement strategy on 3 pillars: healthy and sustainable lifestyle, skills development for the future and sustainable business transformation, complemented by continued involvement in art and culture as well as a new pillar represented by diversity and inclusion.

In 2023, we completely redesigned one of the bank's flagship programs – Raiffeisen Communities, to support and stimulate local sustainable community development projects. An important change of the program is given by the value invested by Raiffeisen Bank in the financing fund, granting EUR 1 million in projects aimed at sustainable transformation of Romanian communities. But the most important change of the program is the accelerator component for NGOs through which community partners will be able to increase their capacity to work in communities and invest in their organizational strength. The funded organizations benefit from acceleration and mentoring, including practical courses to increase the capacity to implement the winning projects: financial management, fundraising, communication and developing a support network in the community. We chose this way of working because we are aware of the importance of the civic sector for strengthening active, educated and involved communities.

The main results of 2023 are:

- the total value of investments reported with the support of the LBG methodology exceeded EUR 4.3 million, a 3% increase in invested amount compared to the previous year;
- 93% of the allocated amount was managed by NGOs, and 7% of the amount was allocated to educational institutions;
- the time allocated by our colleagues to volunteer initiatives was 588 hours in financial education programs, but also blood donation or tree planting.

Total amount of investments in programs and Community projects (lei)	
2023	21.289.617
2022	6.819.875
2021	9.070.021

Together for society

One of the most used contribution mechanisms in Romania is the one dedicated to donations by direct debit. For over 12 years, the mechanism has been used by those who want to change the Romanian society for the better, because the mechanism is easy to use, transparent, reliable, and flexible. In the last year, 2,334 Raiffeisen Bank customers were active donors and donated more than RON 1,966,520 (approximately EUR 397,560) through Direct Debit. In addition, 449 donors with accounts with other banks have direct debit donation contracts managed by Raiffeisen Bank, the amounts donated by them in 2023 being RON 252,558 (approximately EUR 51,000).

Community partners

NGOs remain the main community partners, but once our attention to education programs gains more weight, we have also turned to supporting schools.

Proportion of the Bank's contributions to additional resources attracted by Community partners		
	Raiffeisen Bank Contribution (%)	Additional resources attracted (%)
2023	87	13
2022	65	35
2021	70	30

The people we help through our community projects

During 2023, more than 201,000 people were reported by community partners as beneficiaries of the community initiatives they implemented with the support of Raiffeisen Bank. These people benefited from support thanks to which they were able to gain new skills, but also learn new things and thus change their social behavior. Last but not least, organizations have also reported changes in the quality of life of the beneficiaries they work with.

Volunteering at Raiffeisen Bank

Through our volunteering policy, we encourage and support our employees to participate in volunteering actions in the communities they belong to, both individually and through corporate volunteering, both during working hours and in their free time.

The company provides 1 working day/year, for volunteer activities that employees can perform within community projects supported by the Bank.

The volunteering actions provided by Raiffeisen Bank are evaluated at the end of each year, based on the London Benchmarking Group methodology. Raiffeisen Bank volunteers receive at the end of each year a questionnaire that evaluates the volunteering activities provided, the volunteers' motivation and the impact that volunteering has on Raiffeisen Bank employees.

In 2023, 178 colleagues chose to volunteer and dedicated 588 hours to these activities.

3.3 Suppliers relations

The Bank manages its procurement process for goods and services essential to our operations according to the Procurement Procedure. The Procedure ensures a consistent, clear and effective approach for the Procurement Department in order to procure goods and services for supporting the Bank's activities, in a transparent and efficient manner. Suppliers have been classified into 3 categories, reflecting our specific business conducted in offices: IT, Non-IT, Premises Rentals. For the first two categories (IT and Non-IT), the selection of goods and services suppliers is made in accordance with Raiffeisen Bank's Procurement Procedure and Group Policy. The selection of suppliers for Premises Rentals is carried out in accordance with the Procedure for the Procurement of Rentals and Utilities. The flow of procurement activities, including initiation of purchase requests, pre-approval of expenses related to the requests, running of tender selections or tenders, issuing of orders and confirmation of receipt for goods/products is carried out in an internal IT application.

When signing the agreements, suppliers are required to acknowledge and sign the Supplier's Code of Conduct, unless they demonstrate that they have their own code and standards equivalent to the RBRO/RBI. The Supplier Code of Conduct includes a section dedicated to environmental mandatory standards of conduct and responsible practices, with a focus on environmental protection and resource and waste management, as well as sections dedicated to social and governance mandatory standards of conduct and responsible practices, covering freedom of association and the right to collective bargaining, adequate remuneration, working time, health and safety at work, diversity, inclusion and non-discriminatory treatment of own employees, prohibition of child and forced labour, prevention of corruption and financial crime, prevention of money laundering and terrorist financing, respect for the principles of free competition, sponsorship and political contributions, intellectual property, security and data protection.

Given that over 85% of our suppliers are local, the impact generated through our procurement practices is positive as we contribute to supporting and developing the local economy. This, in turn, creates jobs and increases economic activity of the community. At the same time, in order to contribute to a sustainable society, but also to prevent disruptions in the supply chain, suppliers need to be assessed against social and environmental criteria. Thus, in 2022, the Procurement Department sent a questionnaire to some of the Bank's suppliers to find out how they address and integrate sustainability aspects into their products and services. Following the analysis of the responses received, we identified a number of actions to be taken, including: extending the scope of the questionnaire to a larger number of suppliers; adapting the requirements and requesting additional information for certain indicators to improve the quality of the assessment; re-assessing suppliers against ESG criteria.

Suppliers*	2023	2022	2021
Local suppliers and service providers**	1,295	1,446	1,337
Other suppliers and service providers	154	126	121
Total	1,449	1,572	1,458

*Supplier: Natural or legal entity that supplies the Bank with a good/product or provides a service

**Local Supplier: Supplier based in or registered in Romania

Supplier expenditure	2023 (lei)
Local suppliers and service providers	835,611,214.43
Other suppliers and service providers	248,007,353.86
Total	1,083,618,568.29

4. Our responsibility for the environment

At Raiffeisen Bank Romania, responsibility also extends to environmental protection. Although our direct environmental impact is low, as a financier, we play an important role in reducing the indirect impact of our Bank's portfolio through sustainable financing policies that support efforts to shift towards an economy that incorporates the principles of sustainable development.

Beyond complying with national legislative regulations, as part of Raiffeisen Bank International, we have adopted and strictly adhere to the environmental policy and internal Group-wide regulations. Thus, our commitments in this regard address issues such as energy efficiency, renewable energy consumption, sustainable transport and mobility and responsible procurement practices.

4.1 Fighting climate change

The main environmental risks we face in our day-to-day activities stem from the negative impact of the climate crisis on the entire economic sector: the dependence on non-renewable natural energy resources, the adoption of inadequate or disproportionate measures compared to the speed of environmental change, and the unwillingness of the economic sector to adapt to the current context and implement action plans to combat the effects and negative impacts of climate change. Moreover, a major national risk is also posed by frequent legislative changes in this area.

Energy

		MWh	tep	GJ
Electricity from suppliers	2021	15,600.00	1,341.60	56,160.00
	2022	14,877.56	1,279.47	53,559.21
	2023	14,314.06	1,231	51,530.61

The share of electricity from renewable sources in Raiffeisen Bank Romania's total electricity consumption for 2023 was 50.50%

		MWh	toe	GJ
Energy for heating (gas)	2021	10,632.72	914.41	38,277.79
	2022	13,012.37	1,119.06	46,844.53
	2023	11,068.73	951.91	39,847.42

Year	2021			2022			2023		
Unit of measurement	t	tep	GJ	t	tep	GJ	t	tep	GJ
Diesel	330.09	335.04	14,061.90	334.08	339.09	14,231.6	315.50	320.23	13,440.67
Gasoline	8.13	8.54	353.70	26.89	28.23	1,169.98	63.12	66.28	2,745.72

Conversion factors

Electricity 1 MWh = 0,086 tep

Natural gas 1 MWh = 0,086 tep

Gasoline 1 t = 1,050 tep

Diesel 1 t = 1,015 tep

Gasoline density = 0,72 t/m³

Diesel density = 0,82 t/m³

1 t diesel = 42,6 GJ

1 t gasoline = 43,5 GJ

1 MWh = 3,6 GJ Transport

Transportation for employees	2023	2022	2021
Distance traveled with company cars (km)	6,523,000	6,111,277	5,767,969

In 2023, activity has fully resumed as in the pre-pandemic period, explaining the increase in business travel.

4.2. Responsible resource consumption

Materials

Resource type	2021	2022	2023
Printing paper (kg)	245,488	197,290	204,508

ATM/ MFM paper rolls (kg)	Data not monitored	Data not monitored	52.275
Printed materials (kg)	129,296	2,550	3,880
PVC total (kg)	Data not monitored	5,284.174	5,290.178
Recycled PVC (kg)	Data not monitored	2.081	1,097.514
Toners (pcs)	634	4,078	3,856*

* reused toners

Waste

Recycled waste (kg)	2021	2022	2023
Paper	41,871	184,821	141,049.51
Glass	Data not monitored	85	2,577
Plastic	2,427	38,935	4,886.89
Iron	Data not monitored	6,441	4,160
WEEE	13,392	14,921	5,190

Waste directed to disposal (kg)	2021	2022	2023
Household waste	2,045,259	5,331,145	1,899,724.09

Other materials/wastes diverted from disposal	2023
refurbishment	3,060 kg DEEE
repurposing	109 pcs DEEE, 277 pcs furniture

Note: Raiffeisen Bank Romania publishes annually a sustainability report developed based on the Global Reporting Initiative (GRI) Standards methodology. The sustainability report for the financial year 2023 will be published after this statement and will be available on the bank's website.

5. Regulatory disclosure requirement in accordance with Article 8 of the EU Taxonomy Regulation (EU Regulation 2020/852)

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 Regulation requires undertakings covered by the Non-Financial Reporting Directive (NFRD)* to publish information on how and to what extent their economic activities qualify as environmentally sustainable under the Taxonomy Regulation. Raiffeisen Bank Romania is thus required to disclose the Taxonomy eligibility and Taxonomy alignment of its economic activities for the 2023 financial year.

**NFRD = Non-Financial Reporting Directive 2014/95/EU, Corporate Sustainability Directive (CSRD) (EU) 2022/2464*

5.1. Details about templates and covered exposures as well as information on data sources and current data limitations

Raiffeisen Bank Romania approach for determining Taxonomy-eligible and Taxonomy-aligned economic activities, assets and economic sector

Total covered assets are identified as per requirements of the full Green Asset Ratio disclosure. Exposures towards central banks, supranational institutions, the central government, and assets held for trading are excluded. The remaining covered assets form the denominator in the formula for calculating the Green Asset Ratio (GAR).

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

- Taxonomy-eligible and Taxonomy-aligned economic activities of NFRD undertakings
- 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 cancelation of the debt and held for sale.

In addition to the exposures and assets already excluded from the denominator, derivatives (not held for trading), on-demand interbank loans, cash and cash-related assets and other assets (e.g., goodwill, commodities) are also excluded from the numerator. Further, no exposures to non-EU or to small and medium-sized enterprises may be taken into consideration at present. If the purpose is known at transaction level and is consistent with the defined activities of the EU Taxonomy Regulation or the supplementary Delegated Regulation – for example, a property loan (acquisition and ownership of a building) –, Raiffeisen Bank Romania considers exposures to the extent that Taxonomy eligibility and Taxonomy alignment can be demonstrated for the underlying transaction.

The relevant Taxonomy KPIs for general purpose transactions regarding investment (CAPEX) and turnover key figures for non-financial counterparties as well as the Taxonomy-specific KPIs of the financial counterparties were collected internally as part of the data collection project and by an external data provider, following the Raiffeisen Bank International approach.

Given that financial counterparties do not publish their Taxonomy-aligned information for the 2023 financial year until 2024, these cannot be included for this year's disclosure. A similar limitation can be observed for the Taxonomy eligibility in relation to the four new environmental objectives, where financial and non-financial counterparties only have to disclose official information on Taxonomy eligibility as of 2024 (for the 2023 financial year).

Due to still limited structured data availability and the limitations described previously, RBRO's entire relevant portfolio could not be considered fully for the GAR assessment. It is expected that the share of Taxonomy-eligible

and Taxonomy-aligned exposures will change accordingly and increase in the future, as more information will be disclosed by customers.

Exposures to Taxonomy-aligned economic activities for the “climate change mitigation” and “climate change adaptation” environmental objectives (GAR (stock))

In accordance with the instructions set out in Annex V of the Delegated Regulation, the exposures to be included in the numerator encompass banking book loans and advances to NFRD-relevant clients, households (limited to loans collateralized by residential real estate and loans granted for home renovation purposes), and loans and advances to local governments.

All retail exposures relevant to the EU Taxonomy were analyzed under the understanding until now of the EU Taxonomy objective “climate change mitigation” and included in the CAPEX as well as in the turnover GAR.

For the 2023 financial year, Raiffeisen Bank Romania has started to analyze retail exposures in detail, particularly house purchase, where identified, for example, thresholds for Nearly Zero Energy Buildings (NZEB).

By reference to internally available data, Raiffeisen Bank Romania followed the RBI Group’s approach for NFRD client base, which was determined according to the following criteria:

- a) the country in which the counterparty is registered must be an EU country.
- b) the business partner’s total assets (on consolidated basis) must be more than or equal to € 20 million or its total revenue (turnover) must be more than or equal to € 40 million. For insurance and reinsurance undertakings, the gross premiums written are used instead of revenue and the gross operating result for the other financial institutions.
- c) the customer is either a capital-market oriented company, a credit institution, or an insurance undertaking.
- d) the customer has more than 500 employees on an average basis (on consolidated basis).

Raiffeisen Bank Romania followed RBI’s internal approach to improve the previous data quality regarding the identification of NFRD undertakings for the 2023 financial year with the support of an external data provider. According to the interpretation in the frequently asked questions (FAQs) published by the European Commission in December 2021, the disclosure of Taxonomy-eligible and Taxonomy-aligned exposures must be based on actual information provided by the financial or non-financial undertaking. 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 for the “climate change mitigation” and “climate change adaptation” environmental objectives (GAR (flows))

The KPI “GAR KPI flow”, which is to be reported for the first time for the 2023 financial year, is calculated in line with “GAR KPI stock”. However, unlike „GAR KPI stock“, it only takes into account those positions that were newly concluded in the 2023 financial year.

Exposures to Taxonomy-eligible economic activities/covered assets for the four new environmental objectives

Due to the limited availability of structured data for the four new environmental objectives, Raiffeisen Bank Romania relevant portfolio could not be incorporated in this evaluation. However, the data availability on the Taxonomy eligibility of the new Taxonomy environmental objectives is expected to improve significantly next year, as customers will also be obliged to disclose such information then.

Exposures to Taxonomy-eligible and Taxonomy-aligned economic activities/ cover assets for nuclear and gas economic activities

During 2022, the European Commission extended the EU Taxonomy to include six economic activities in the nuclear and gas sector, which came into force for the first time on 1 January 2023. Companies operating in these sectors therefore also started to publish EU Taxonomy data on Taxonomy eligibility and Taxonomy alignment for their relevant nuclear and gas activities for the first time in the course of 2023.

5.2 ANNEX

Note for the tables below: - /0 = no exposures identified

5.2.2 Annex VI under Article 8 Taxonomy Regulation

Annex VI under Article 8 Taxonomy Regulation - CapEx based disclosure

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation - CapEx based disclosure

		Total environmentally sustainable assets	KPI****	% coverage (over total assets)***
Main KPI	Green asset ratio (GAR) stock	303.72	4.2%	51.19%
		Total environmentally sustainable activities	KPI	% coverage (over total assets)
<i>Additional KPIs</i>	<i>GAR (flow)</i>	74.94	1.0%	62.60%
	<i>Trading book*</i>	-		
	<i>Financial guarantees</i>	48.43	4.9%	
	<i>Assets under management</i>			
	<i>Fees and commissions income**</i>			

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

**Fees and commissions income from services other than lending and AuM

Institutions shall disclose forward looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI over banks' total assets

****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

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

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.

2. GAR sector information - under Article 8 Taxonomy Regulation - CapEx based disclosure

a	b	c	e	f	h	i	k	l	n	o	q	r												
													Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
													Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)													
1	0610 - Extraction of crude petroleum	4.7	1.0	-	-	-	-	-	4.7	1.0	-	-												
2	2910 - Manufacture of motor vehicles	0.2	0.0	-	-	-	-	-	0.2	0.0	-	-												
3	2932 - Manufacture of other parts and accessories for motor vehicles	15.1	3.3	-	-	-	-	-	15.1	3.3	-	-												
4	3511 - Production of electricity	0.0	0.0	-	-	-	-	-	0.0	0.0	-	-												
5	3513 - Distribution of electricity	1.6	1.5	-	-	-	-	-	1.6	1.5	-	-												
6	3514 - Trade of electricity	22.9	21.2	-	-	-	-	-	22.9	21.2	-	-												
7	3522 - Distribution of gaseous fuels through mains	63.0	61.5	-	-	-	-	-	63.0	61.5	-	-												
8	3523 - Trade of gas through mains	81.9	79.9	-	-	-	-	-	81.9	79.9	-	-												
9	4120 - Construction of residential and non-residential buildings	0.0	0.0	-	-	-	-	-	0.0	0.0	-	-												
10	4621 - Wholesale of grain, unmanufactured tobacco, seeds and other agricultural products	15.6	14.5	-	-	-	-	-	15.6	14.5	-	-												
11	4673 - Wholesale of wood, construction materials and sanitary equipment	0.3	0.2	-	-	-	-	-	0.3	0.2	-	-												

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.

4. GAR KPI flow - under Article 8 Taxonomy Regulation - CapEx based disclosure

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Disclosure reference date T															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-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 specialised lending		Of which transitional		Of which enabling	Of which specialised lending		Of which transitional		Of which enabling	Of which specialised lending		Of which transitional		Of which enabling		
1 GAR - Covered assets in both numerator and denominator																
2 Loans and advances, debt securities and equity instruments not Hft eligible for GAR calculation	2.0%	1.0%	0.1%	0.0%	0.8%	-	-	-	-	-	2.0%	1.04%	0.1%	0.0%	0.8%	1.04%
3 Financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21 Non-financial corporations	1.0%	0.9%	0.0%	0.01%	0.8%	-	-	-	-	-	1.0%	0.9%	-	0.00	0.01	0.9%
22 NFCs subject to NFRD disclosure obligations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Loans and advances	1.0%	0.9%	0.0%	0.01%	0.8%	-	-	-	-	-	1.0%	0.9%	-	0.00	0.01	0.9%
24 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 Households	1.1%	0.1%	0.1%	-	-	-	-	-	-	-	1.1%	0.1%	0.1%	-	-	0.1%
27 of which loans collateralised by residential immovable property	1.1%	0.1%	0.1%	-	-	-	-	-	-	-	1.1%	0.1%	0.1%	-	-	0.1%
28 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49 Total GAR assets	2.0%	1.0%	0.1%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	2.0%	1.04%	0.1%	0.0%	0.8%	1.04%

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

5. KPI off-balance sheet exposures - under Article 8 Taxonomy Regulation - CapEx based disclosure

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Disclosure reference date T														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
% (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-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)				
		Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling			
1	Financial guarantees (FinGuar KPI)	6.0%	4.9%	0.0%	0.1%	2.1%	0.0%	0.0%	0.0%	0.0%	0.0%	6.0%	4.9%	0.0%	0.1%	2.1%
2	Assets under management (AuM KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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

Annex VI under Article 8 Taxonomy Regulation - Turnover based disclosure
0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation - Turnover based disclosure

		Total environmentally sustainable assets	KPI****	% coverage (over total assets)***
Main KPI	Green asset ratio (GAR) stock	152.50	2.1%	51.19%
		Total environmentally sustainable activities	KPI	% coverage (over total assets)
Additional KPIs	GAR (flow)	20.30	0.3%	62.60%
	Trading book*	-		
	Financial guarantees	12.36	1.3%	
	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 this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI over banks' total assets

****based on the Turnover KPI of the counterparty

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

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.

2. GAR sector information - under Article 8 Taxonomy Regulation - Turnover based disclosure

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount		Gross carrying amount	
	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
1	0610 - Extraction of crude petroleum	1.9	0.0	-	-	-	-	1.9	0.0	-	-	
2	2910 - Manufacture of motor vehicles	0.2	0.0	-	-	-	-	0.2	0.0	-	-	
3	2932 - Manufacture of other parts and accessories for motor vehicles	14.8	1.5	-	-	-	-	14.8	1.5	-	-	
4	3511 - Production of electricity	0.0	0.0	-	-	-	-	0.0	0.0	-	-	
5	3513 - Distribution of electricity	0.5	0.4	-	-	-	-	0.5	0.4	-	-	
6	3514 - Trade of electricity	7.6	5.6	-	-	-	-	7.6	5.6	-	-	
7	3522 - Distribution of gaseous fuels through mains	10.0	10.0	-	-	-	-	10.0	10.0	-	-	
8	3523 - Trade of gas through mains	13.0	13.0	-	-	-	-	13.0	13.0	-	-	
9	4120 - Construction of residential and non-residential buildings	0.0	0.0	-	-	-	-	0.0	0.0	-	-	
10	4621 - Wholesale of grain, unmanufactured tobacco, seeds and animal	1.4	1.4	-	-	-	-	1.4	1.4	-	-	
11	4673 - Wholesale of wood, construction materials and sanitary equipm	0.2	0.2	-	-	-	-	0.2	0.2	-	-	

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.

4. GAR KPI flow - under Article 8 Taxonomy Regulation - Turnover based disclosure

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Disclosure reference date T															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-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 specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling		
1 GAR - Covered assets in both numerator and denominator																
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	1.2%	0.3%	0.1%	-	0.1%	-	-	-	-	-	1.2%	0.3%	0.1%	0.0%	0.1%	0.3%
3 Financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21 Non-financial corporations	0.2%	0.1%	-	-	0.1%	-	-	-	-	-	0.2%	0.1%	-	-	0.1%	0.1%
22 NFCs subject to NFRD disclosure obligations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23 Loans and advances	0.2%	0.1%	-	-	0.1%	-	-	-	-	-	0.2%	0.1%	-	-	0.1%	0.1%
24 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 Households	1.1%	0.1%	0.1%	-	-	-	-	-	-	-	1.1%	0.1%	0.1%	-	-	0.1%
27 of which loans collateralised by residential immovable property	1.1%	0.1%	0.1%	-	-	-	-	-	-	-	1.1%	0.1%	0.1%	-	-	0.1%
28 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49 Total GAR assets	1.2%	0.3%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	0.3%	0.1%	0.0%	0.1%	0.3%

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

5. KPI off-balance sheet exposures - under Article 8 Taxonomy Regulation - Turnover based disclosure

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Disclosure reference date T														
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
% (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-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)				
		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling			
1 Financial guarantees (FinGuar KPI)	2.1%	1.3%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	2.1%	1.3%	0.0%	0.0%	0.8%
2 Assets under management (AuM KPI)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

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

5.2.3 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

1. Table CAPEX

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	no
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	no
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	no
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	no
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	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

5.2.3. Exposures to Taxonomy (non-)eligible and Taxonomy (non-)aligned economic activities/ covered assets for nuclear and gas economic activities (Turnover) in accordance with Annex XII

1. Table Turnover

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	no
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	no
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	no
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	no
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	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