

No: 1659

To: **FINANCIAL SUPERVISORY AUTHORITY (FSA)** – Financial instruments and investments sector**BUCHAREST STOCK EXCHANGE**

2025 Annual Report as per:	FSA Regulation no.5/2018
Report date	30.04.2026
Name of the issuer	LIBRA INTERNET BANK S.A.
Headquarters	6-6A Calea Vitan, Phoenix Tower, District 3- Bucharest
Phone / Fax No	Tel. +40 (0) 21 208.8000;
Unique Registration Code with the Trade Register	RO 8119644
Order number in the Trade Register	J1996000334403
Subscribed and paid-in share capital	512.622.000 lei
The regulated market where the instruments are traded	Bucharest Stock Exchange
LEI CODE	315700WKDD4ZSRL7HW38

Content: 2025 Annual Report of Libra Internet Bank S.A.,

Libra Internet Bank SA announced that it published the financial results for 2025.

Individual and Separate Financial Statements for the year ended at 31st of December 2025 are prepared in accordance with International Financial Reporting Standards as adopted by the European Union

2025 Annual Report of Libra Internet Bank S.A is available both on the BVB website and on the bank's website at: <https://www.librabank.ro/obligatiuni>.

Melinda Cepi**Director of Financial-Accounting Division**

ANNUAL REPORT

LIBRA INTERNET BANK S.A.

31 december 2025

Drawn up according the FSA Regulation no.5/2018

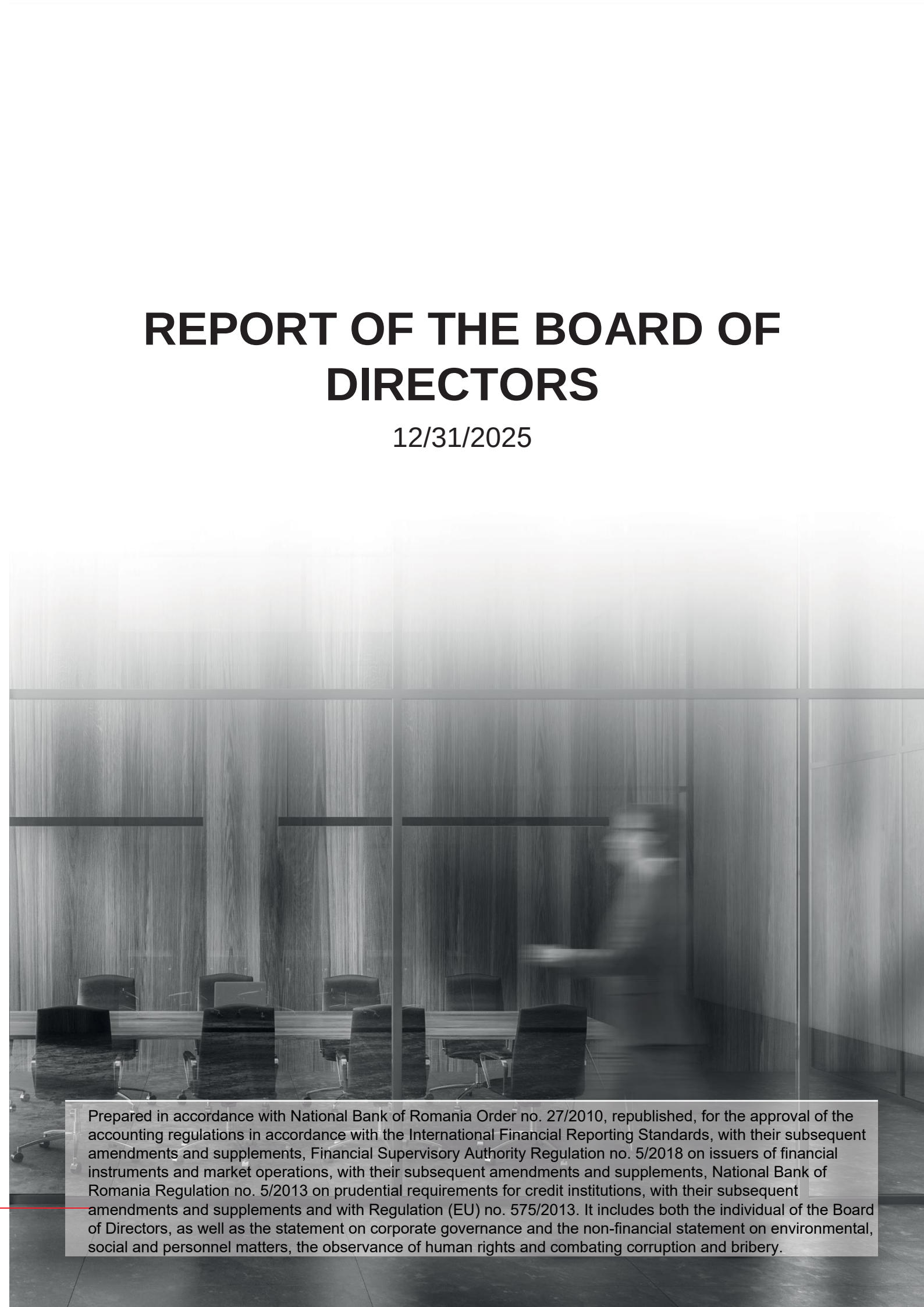
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REPORT OF THE BOARD OF DIRECTORS

12/31/2025



Prepared in accordance with National Bank of Romania Order no. 27/2010, republished, for the approval of the accounting regulations in accordance with the International Financial Reporting Standards, with their subsequent amendments and supplements, Financial Supervisory Authority Regulation no. 5/2018 on issuers of financial instruments and market operations, with their subsequent amendments and supplements, National Bank of Romania Regulation no. 5/2013 on prudential requirements for credit institutions, with their subsequent amendments and supplements and with Regulation (EU) no. 575/2013. It includes both the individual of the Board of Directors, as well as the statement on corporate governance and the non-financial statement on environmental, social and personnel matters, the observance of human rights and combating corruption and bribery.

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The Annual Report in accordance with ASF Regulation ASF no. 5/_2018, Annex 15 for the 2025 financial year (**"the Report"**)

Date of the report: 24.04.2026

Name of the company: Libra Internet Bank SA (**"the Bank"**)

Registered office: Vitan Road, no. 6-6A, Section B, C, Fl. 1, 6, 9, 13, Building Phoenix Tower, District 3, Bucharest

Unique tax registration code: RO8119644

Order number with the Trade Register: J1996000334403

Telephone /fax number: 40 21 208 80 00/ +40 21 230 65 65 Subscribed and paid-in share capital: 512,622,000 RON

The regulated market on which the issued securities are traded: Bucharest Stock Exchange.

The main characteristics of the securities:

1. **LIBRA30E** issuance of subordinated, registered, dematerialised, unsecured and non-convertible bonds, denominated in EUR, with an individual nominal value of EUR 500/bond and a total nominal value of EUR 4,296,500 over 10 years with an interest rate of 5%/year;
2. **LIBRA28E** issuance of MREL-eligible senior dematerialized, unsecured and non-convertible registered bonds with a nominal value of EUR 100,000/bond and a total nominal value of EUR 40,000,000 over 7 years with an interest rate of 4.25%/year;
3. **LIBRA32E** issuance of subordinated, registered, dematerialised, unsecured and non-convertible bonds, denominated in EUR, with an individual nominal value of EUR 500/bond and a total nominal value of EUR 4,262,000 over 10 years with an interest rate of 6.5%/year.

1. Purpose of the Report

The purpose of this Report is to ensure compliance with the requirements for publication, in order to provide an adequate level of transparency to market participants, by publishing information regarding:

- The performance of the Bank's activities and its financial position
- The practices, procedures and structure of Corporate Governance
- The policy on selection and recruitment of members of the management structures, the diversity policy, as well as the remuneration policy
- The impact of the company's activity with regard to environmental, social and personnel aspects, respect for human rights and the fight against corruption and bribery
- The main risks and uncertainties faced by the company, the objectives and policies regarding risk management, as well as the processes for assessing capital and risk, in order to provide a complete picture of the risk profile. In this context, the Report provides a complex overall view of the current risk profile, as well as of the process of managing risks at the level of Libra Internet Bank.

2. Publication requirements

This Report of the Board of Directors meets the requirements for publication requested by:

- Law no. 24/2017 on issuers of financial instruments and market operations, as subsequently amended and supplemented

- Regulation of the Financial Supervisory Authority (ASF) no. 5/2018 on issuers of financial instruments and market operations, as subsequently amended and supplemented
- Order of the National Bank of Romania (NBR) no. 27/2010 for the approval of the accounting regulations in line with the International Financial Reporting Standards, republished, as subsequently amended and supplemented
- The provisions of NBR Regulation no. 5/2013 on prudential requirements for credit institutions and Part Eight of Regulation (EU) no. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending EU Regulation no. 648/2012, hereinafter referred to as the CRR.

The information in this report is also presented in accordance with the guidelines and regulations published separately by EBA ("European Banking Authority").

Coordination of the preparation of the report is the responsibility of the Finance- Accounting Division.

3. Analysis of the activity of LIBRA INTERNET BANK SA

3.1 General considerations

Libra Internet Bank S.A. ("the Bank") was established on 25 November 1996 and operates under authorisation no. 000.025 Series B of 24 January 1997 issued by the National Bank of Romania.

From the legal point of view, Libra Internet Bank S.A. is a private joint-stock company, wholly owned, established in accordance with Law no. 31/1990 on commercial companies and is registered with the Trade Register under no. J1996000334403, having tax identification code RO 8119644, and is a member of the Romanian Banking Association. The Bank's head office is located at: Bank at: Phoenix Tower, Vitan Road no. 6-6A, District 3, Bucharest, Romania.

The Report of the Board of Directors is drawn up in accordance with NBR Order no. 27/2010, republished, as subsequently amended and supplemented, for the approval of the accounting regulations in line with the International Financial Reporting Standards, applicable to credit institutions - Articles 12-17.

Throughout the year 2024, the Bank has carried out its activity in accordance with the Articles of Association approved by the shareholders, as well as with the applicable legislation, the core activity being "Other activities of monetary intermediation – CAEN 6419".

During the financial year 2025, all the operations of the Bank, together with those of the clients and on behalf of the clients, were recorded in the Bank's registers on the basis of supporting documents drawn up in accordance with the Law on accounting no. 82/1991, republished and supplemented by the amendments included in National Bank of Romania Order no. 27/2010, republished, for the approval of the accounting regulations in line with the International Financial Reporting Standards, applicable to credit institutions.

As at 31 December 2025, LIBRA INTERNET BANK S.A. was operating through 59 branches, of which 28 located in Bucharest and Ilfov and 31 in the major cities of Romania.

During the course of the year 2025 there were no mergers, reorganizations significant and disposals of assets significant.

The gross value of investments in the year 2025 in projects of tangible and intangible assets for the current activity and for supporting the growth of the business as budgeted has been of 4,840,092 RON versus 4,315,333 RON in the year 2024 (with increase by 12% compared with the previous year).

3.1.1 Elements of evaluation general of the activity

The external auditor of the Bank, Deloitte Audit SRL, carried out the annual audit of the separate and individual financial statements for the financial year ended on 31 December 2025.

Starting with 2020, the Bank prepares both individual financial statements and separate financial statements, taking into account its significant participation in the establishment of the associate entity Libra Development IFN S.A (during the course of the year 2020).

In the statements financial individual, the Bank presents the investment in the associate at a value equal to 49% of the value of its equity, while in the separate financial statements the investment is presented at cost (with the related impairment test being performed).

This report of the Administrator makes reference to the statements financial separate of the Bank.

The audit opinion states that the separate financial statements give a true and fair view of the separate financial position of the Bank at the date of 31 December 2025 as well as of its separate financial performance and separate cash flows for the financial year then ended, in accordance with the International Financial Reporting Standards as adopted by the European Union.

The main results of the assessment of LIBRA INTERNET BANK SA are expressed in the economic and financial indicators below:

Economic and financial indicators	2025	2024
Net assets	13,902,382,857	12,714,653,618
Turnover	1,204,971,241	1,128,859,740
Net result	324,048,123	270,221,847
Market share in terms of assets	1.45%	1.44%
Total equity ratio	24.32%	21.53%
Liquidity coverage indicator	285.48%	300.39%
ROA (net profit/total assets)	2.43%	2.26%
ROE (net income / equity)	20.35%	20.09%
Cost/revenue	53.09%	46.93%
Gross loans/Deposits	69.38%	64.41%
Immediate liquidity	42.68%	46.49%

The comparison with the main financial indicators of the budget is presented in the table below:

	Actual 2025	Budgeted 2025	Change (%)
Net assets	13,902,382,857	13,643,217,778	1.90%
Gross loans	8,693,566,682	8,700,000,000	-0.74%
Deposits from the customers	11,671,054,227	11,298,701,300	3.3%
Own funds	1,754,175,739	1,730,025,248	1.40%
Net income from interest	666,240,372	679,345,128	-1.93%
Net income from commissions	86,801,476	51,327,494	69.11%
Other net operating income net	83,794,911	65,650,925	27.64%
Administrative expenses	454,154,086	430,758,285	5.42%
Expenses with provisions related to the loans	49,476,904	55,271,019	-10.48%
Net profit	324,048,123	299,897,631	8.50%

3.1.2 Evaluation of the technical element of LIBRA INTERNET BANK S.A.

On the date of 31 December 2025, Libra Internet Bank S.A. was conducting its activity through a network own of 59 branches, of which 28 in Bucharest and Ilfov, the rest in the main cities of Romania. The Bank also has at its disposal two IT operating centres in Craiova and Cluj-Napoca.

The Bank does not own its own ATMs in operation, but uses the EURONET network, which operates 572 ATMs, of which 59 are installed at the Bank's premises. At the same time, the Bank ended the year 2025 with 10,417 POS terminals installed at merchants.

From the point of view of the IT system, Libra Internet Bank S.A. uses the centralized T24 system from Temenos. The Bank is present on the market with innovative products and services, some of these being offered for the first time in Romania.

Description of the main products produced and/or services provided

The Bank mainly offers lending products segmented by business lines and fields of activity and deposits which are improved constantly taking into account the needs of clients and market conditions.

Additionally, Bank offers clients also a platform Internet Banking available 24 hours a day, 7 days a week with many features, a platform which represents a powerful tool, but at the same time also user-friendly for clients.

Having a strong focus on digitalization, two other online banking services offered by the Bank are the application Mobile Banking (an application for all banking operations) and the service for online card payments, intended for eCommerce clients, Libra Pay.

The products and services offered by the Bank are addressed to both individuals and legal entities, focusing on five main areas of activity from a point of view of lending and of attracting of resources: Real Estate (real estate developer clients), Corporate (legal-entity clients), Liberal professions (clients doctors, hospitals, medical clinics and medical offices, notaries, lawyers, pharmacists) and Agribusiness (clients from agriculture) and Individuals.

The Bank's commercial strategy monitors the results on the following sales segments (business lines):

- Individuals,
- Small companies (SME clients, liberal professions and agriculture),
- Large companies (companies with a turnover above 5 million EUR),
- Digital,
- Treasury,
- Others and GM (other unallocated areas and General Management).

Structure of the portfolio of loans by segments at the end of the year 2025 is summarized in the table below

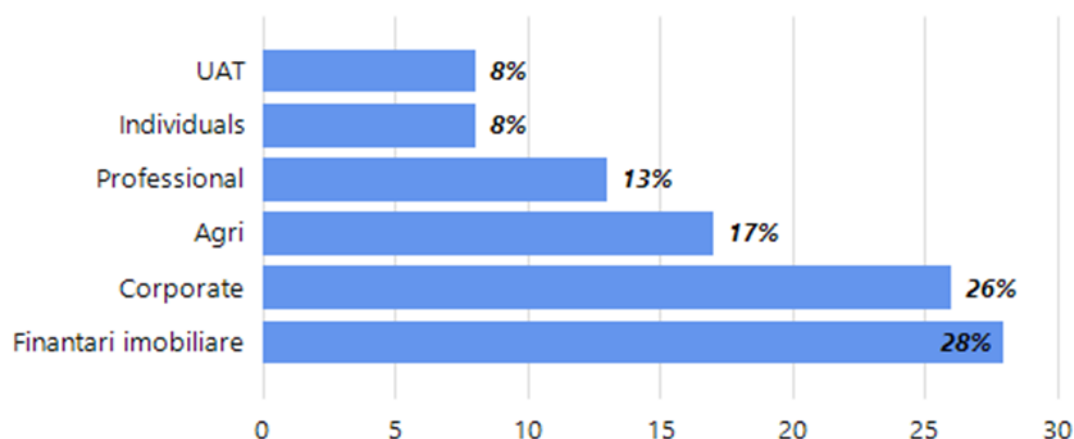
Credits	2025	2024
Individuals	8%	11%
Small-sized companies	31%	33%
Large companies	61%	56%
Treasury	0%	0%
Others and GM	0%	0%
TOTAL	100%	100%

The structure of the deposit portfolio from non-bank customers by segments is presented in the table below:

Deposits	2025	2024
Individuals	35%	33%
Small-sized companies	30%	31%
Large companies	35%	35%
Treasury	0%	0%
Others and GM	0%	1%
TOTAL	100%	100%

From the point of view of lending sectors, the structure of loan sales at the end of the year 2025 is as follows:

Portofoliu credite



The main activities carried out by the Bank in the year 2025 were: raising of resources, placing resources, lending, cards, solutions electronic for payment Libra Pay and collaborations for payment with various Fintechs in the field of collections and payments.

The Bank's total revenues for the last two years – defined as the sum of net interest income, net fee income, net income from foreign exchange transactions, income from financial instruments at fair value and other income – are presented in the table below, broken down by segments:

Total revenues	2025	2024
Individuals	-45,108,100	-50,404,866
Small-sized companies	231,370,633	223,075,537
Large companies	398,438,670	365,900,515
Treasury	252,378,928	224,827,374
Others and GM	-243,370	2,906,061
TOTAL	836,836,759	766,304,620

We note that the figures above do not include the transfer prices between business segments.
For the next time horizon, the courses of action will be:

- Sustainable growth of the client portfolio and extending the presence in the Bank's strategic segments.
- Diversifying and developing the portfolio of products and services, in order to generate additional sources of income.
- Consolidating commercial relationships with existing clients and intensifying cross-selling and up-selling activities.
- Increasing client satisfaction and loyalty, by simplifying interaction with the Bank and developing value-added services.
- Accelerating the growth of the digital channel by attracting new clients into the digital ecosystem, increasing the use of digital tools and fully digitizing lending processes, with a focus on the retail & micro segments, for a fast, simple and scalable experience.
- Improving the efficiency of commercial processes and sales channels, including through the adoption of digital solutions.

New products

In May 2025, Libra was among the first banks on the market to launch the RoPay for Business service, which ensures the settlement of transactions in 10 seconds, has reduced costs and integrates easily into the digital infrastructure of any business.

In June 2025, the Bank introduced physical cards with a tactile design, dedicated to persons with disabilities, in order to facilitate accessibility and the independent use of payment instruments.

In September 2025, the Click to Pay Mastercard solution was implemented, which allows online payments to be made quickly and safely, without entering card data at enrolled merchants.

In November 2025, Libra and Investment and Development Bank signed a guaranteed agreement through which the financing of SMEs and administrative-territorial units (ATUs) is supported.

3.1.3 Evaluation of the technical- material supply activity

This element is not significant for the Bank.

3.1.4 Evaluation of the sales activity

Sales within the Bank are carried out only on the Romanian market through the five business segments described above: Individuals, Small Companies (which includes the sales force dedicated to microenterprises, clients in agriculture and those in liberal professions), Large Companies, Treasury and Others.

Sales activity takes place in a highly competitive environment, in which banks have developed and have adapted their offers in line with market requirements, with the impact of exogenous factors on the real economy, as well as the pressure of an increasingly more evident competition on the financial market and banking. In the last period, the development of the banking system has materialized both through the diversification of banking products and services and through the increase in the speed of settlement of banking instruments and in the degree of technologization. Libra Internet Bank S.A. in this context constantly focuses its attention on the automation of products, operational flows and digitalization.

Description of any dependence significant with regard to a single client or with regard to a group of clients whose loss would have a negative impact on the Bank's income.

Not the case.

3.1.5 Assessment of aspects related to employees/staff

At the end of year 2025, the Bank had 1,386 employees, up by more than 5% compared with 2024, continuing the strategic objective of strengthening the technical teams, thus supporting development, innovation and sustainable growth.

In RON	31 December 2025		31 December 2025		31 December 2023	
	No. of employees	Salary costs	No. of employees	Salary costs	No. of employees	Salary costs
Operational staff	1.229	212.353.522	1.146	168.331.949	953	130.565.914
Management staff	157	75.708.044	168	65.009.822	147	60.511.553
	1.386	288.061.566	1.314	233.341.771	1.100	191.077.467

The activity of personnel in the Bank is provided by the Division of Human Resources which supervises the processes of recruitment and selection, the evaluation of performance, retention and rewarding of employees as well all professional development and training programmes, to increase employee motivation and commitment.

The evaluation of professional performance is addressed to all the Bank's employees and is carried out annually by measuring the achievement of objectives of business (KPI), but also of the abilities necessary for fulfilling responsibilities. The process of performance evaluation is transparent for all employees.

The process of remuneration and of implementing benefits is managed by the Human Resources Division and is based on the following principles: motivating employees and maximising their performance, attracting and retaining talent within the Bank, supporting the Bank's organisational culture and promoting its values, aligning remuneration with profitability, risk, capital adequacy, liquidity and sustainable growth, compliance with the legal framework in force, transparency and internal fairness. Measures are taken into consideration to avoid conflicts of interest and the assumption of excessive risks by employees.

The component variable of the total remuneration takes into account several elements, such as sales or operational bonus, bonuses for the recognition of exceptional results exceptional, bonus for involvement in projects, team motivation bonus, loyalty bonus and other types of allowances.

Variable remuneration is not guaranteed, being correlated with the sound management of risks and with the principle of remuneration based on performance, thus including the possibility of not paying any component of it.

For roles that have a significant impact on the Bank's risk profile ("Identified Staff"), the Bank complies with the local and European legislation in force. The variable component does not exceed 100% of the fixed component of the total remuneration for each person in the category of Identified Staff.

For Identified Staff who could benefit from remuneration variable, the variable component cannot exceed 100% of the fixed component of the remuneration annual total. When determining the ratio, the sum of all the components of variable remuneration that could be granted (including the deferred component due for the reference year and deferred for the following years) is considered and is divided by the sum of all components of fixed remuneration granted for the same reference year.

The annual variable component is calculated and granted starting from the year immediately following the results' reference date. From the total amount of variable remuneration, an up-front component (or advance payment) of 60% is allocated to the respective person, as follows: 50% in cash (the cash component of the annual bonus) and 50% in phantom shares (the non-cash component of the annual bonus).

A substantial part, which in all cases represents 40% of the variable remuneration component, is deferred over a period of 4 years and is adequately correlated with the nature of the activity, its risks and the activities of the staff member concerned. The deferred component is recorded in the form of a provision.

	31 December 2025	31 December 2024	31 December 2023
Expense/(income) with short-term benefits (personnel expenses)	11,802,069	10,592,958	12,162,654
Deferred long-term benefit expense/(income) (other operating expenses)	3,143,935	3,295,868	2,946,025
TOTAL	14,946,004	13,888,826	15,108,679

3.1.6 Assessment of aspects related to the impact of the Bank's core activity on the environment

According to the details in the Non-financial Statement in Chapter 4. 4.

3.1.7 Assessment of research and development activity

The research activity is not a significant element for the Bank.

The development activity took into account the objectives set by the activity plan and the Budget of the year 2025 by continuing the processes of automation, streamlining and digitalization of the processes in the bank.

3.1.8 Assessment of the Bank's activity regarding risk management

The control internal of the Bank observes 3 fundamental functions: the risk management function, the compliance function and the internal audit function. The control functions are independent of one another, from an organizational point of view, and of the operational and support functions that they monitor and control.

The function of risk management is a central component of the system of internal control of the Bank, in the direct subordination of the Deputy Chief Executive Officer. This function is ensured by the Bank through the Risk Management Division, the Bank, in the exercise of its of managing of risks it carries out its activity in accordance with the legal provisions and the banking-specific regulations (European and national), having as its purpose:

- i. Maintaining and developing a risk culture. The risk management division promotes a risk culture at institution level, through a series of complementary activities, such as:
 - Continuous and periodic monitoring of risks, in accordance with the Risk Profile and strategy;
 - Informing employees with regard to good practices in management of risks.
- ii. Maintaining and developing a framework for management of risks. The Bank has a role central in maintaining and updating the risk management framework through:
 - Implementing policies, procedures, limits and controls that ensure the identification, assessment, monitoring, mitigation and reporting of risks related to the institution's activities at the level of the business lines and at the overall level of the credit institution;
 - Developing forward-looking and backward-looking tools for the identification and measurement of risks;
 - Establishing and managing periodic and transparent reporting mechanisms so that the management body and all relevant banking institutions have timely, accurate, concise, intelligible and meaningful reports and can exchange relevant information through the identification, measurement or assessment and monitoring of risks;

iii. Drawing up and implementing a policy for the approval of new products and changes to existing products through:

- Periodic checks carried out at the level of all entities within the Bank;
- Promoting the responsibility of the Bank's employees with regard to managing risks and reducing them by managing self-control activities;
- Testing employees targets both the level of theoretical and practical training and the ability to identify and report incidents or vulnerabilities that may expose the Bank to risk.

In order to keep risk within acceptable limits and to obtain results that compensate the assumed risk, in accordance with the Bank's strategy and business model, the risk management function implements and manages an effective and comprehensive risk management framework. This framework includes elements such as organizational structure, policies, methodologies, processes and controls, all aligned with the principles and guidelines of the risk strategy. The main objective is to ensure rigorous risk management through identification, assessment, measurement, control and monitoring/reporting.

Establishing and monitoring risk limits that translate the Bank's risk appetite into an operational level, periodic reporting of their classification, identification of upper limits and the actions to be taken.

The Board of Directors approves and oversees the appetite for risk, after the definition of the objectives, the strategies and key risk indicators; the time horizons relevant for the objectives and types of risks and the intervals over which the Bank is willing to assume them for achieving the objectives. The vision of the Board of Directors regarding the appetite for risk is applied on a regular basis and is embedded in the organizational culture.

The main significant risks to which is exposed the Bank are: risk of credit, the risk operational, market risk, liquidity risk, strategic risk and compliance risk.

Credit risk is the main risk to which the Bank is exposed as a result of its core mission and the nature of its activities. The bank is exposed to this risk as a result of transactions with customers and other counterparties. With regard to customer exposures, all new exposures are approved by a credit committee, sub-committee or the Board of Directors, following an in-depth analysis of potential borrowers.

Operational risk is the risk of loss that results from the use of inadequate internal processes, people or systems or from their failure to perform their function properly, or from external events. It includes legal risk, fraud risk, model risk, IT risk, and the risk associated with outsourced activities.

Market risk is the risk of losses on on-balance-sheet and off-balance-sheet positions due to adverse fluctuations in the market (in relation to the portfolio Bank, the risk of the foreign exchange rate and the risk of the interest rate).

Liquidity risk represents the current or future risk of a negative impact on profits and capital, determined by the credit institution's inability to meet its obligations at maturity.

Strategic risk (including business risk) is defined as the current or future risk of negative income and capital losses due to changes in the business environment or unfavourable business decisions, the implementation in into effect in an improper manner of decisions or the lack of reaction to changes in the environment of business.

Risk of compliance is the risk current or future of loss of profit and capital, which may lead to fines, damages and / or termination of contracts or which may affect the reputation of the bank as a result of violations or non-observance of the legal and regulatory framework, recommended practices or ethical standards.

As at 31 December 2025 the profile internal of risk of the bank is presented in the table shown further below:

Credit Risk (CR)	Medium Low
Residual Risk (RR)	Low
Concentration Risk (CCR)	Medium
Liquidity Risk (LR)	Medium Low
Foreign currency lending risk of borrowers not hedged against currency risk (FXL)	Low
Market Risk (MR)	Low
Interest rate risk outside the trading book (IRR)	Medium
Operational Risk (OR)	Medium Low
Outsourcing Risk (EX)	Medium Low
IT&C Risk (IT)	Medium Low
Compliance Risk (COM)	Medium Low
Reputational Risk (REP)	Medium Low
Strategic Risk (including business risk) (STR)	Low
TOTAL Score Profile	Within the Risk Appetite

Compliance function

The compliance function reports directly to the Deputy Chief Executive Officer and, as part of the Bank's internal control system, has the role of identifying, assessing, monitoring and reporting the Bank's management aspects related to the compliance risk associated with its activities. It also contributes to promoting a sound organizational culture in matters of compliance, ensuring observance of internal rules and standards, as well as the code of conduct established at industry or market level. At the same time, the compliance function provides relevant information regarding developments in this field.

Compliance plans establish the activities to be carried out on the basis of an annual program submitted to the Management Body for approval. This program includes at least the following: implementation and review of specific policies and procedures; assessment of compliance risks; testing and training of staff with regard to aspects related to compliance.

Function of Anti-fraud

The Anti-fraud function reports directly to the Deputy Chief Executive Officer. The activity carried out within this function aims to ensure a stable and secure environment for Libra Internet Bank SA and its clients, by applying an effective approach to the prevention and combating of fraud, as well as by promoting an organizational culture oriented towards protecting the Bank's reputation and values.

The anti-fraud activity aims at:

- Implementing effective controls to prevent and detect fraud and other illegal activities carried out to the detriment of the Bank;
- Clarifying, in the relationship with the Bank's partners and collaborators, that any illegal activity, as well as obtaining a personal benefit in an illegal or immoral manner, is strictly prohibited;
- Ensuring an appropriate framework for employees and clients to report or communicate suspicions of fraud or fraudulent, corrupt or criminal behaviour.
- Ensuring the complete and fair investigation of all activities suspected of fraud.

The purpose of this function is to define the principles of fraud risk management, to establish the concepts and requirements specific to the field, as well as the methods of assessing actions, inactions or omissions likely to constitute frauds. At the same time, the general directions regarding the management of frauds within Libra Internet Bank SA are outlined, in accordance with the applicable legal regulations.

Internal audit function

The function of internal audit is subordinated to the Board of Directors, and, from an administrative point of view, it is subordinated to the Chief Executive Officer. The internal audit activity is strictly monitored by the Audit Committee, which analyses and debates all reports prepared by the Internal Audit Division and in turn makes proposals to the Board of Directors.

3.1.9 Elements of outlook regarding the activity of the Bank

Given the high degree of uncertainty regarding the impact of tax changes on economic growth, in a context in which domestic and international developments may cause the authorities to adopt new budget adjustment measures in order to achieve a deficit target of approximately 6% of GDP in the year 2026, the Bank has proposed a set of measures for the year 2026 and the period immediately following, aimed at strengthening operational resilience, optimizing costs and maintaining a sustainable development trajectory.

Profitable Growth: Consolidating the market position by capitalizing on solid expertise and sustainably expanding operations.

- **Focus on Niche Segments:** Paying increased attention to traditional segments, such as liberal professions, agriculture, real estate, SMEs, where the Bank has solid experience and a high degree of specialization in these fields.
- **Strengthening the Position through Organic Growth and Partnerships:** Strengthening the Bank's position through organic growth and assessment of opportunities for new partnerships that complement the range of products and services.

Accelerated Digitalization: The Bank has continued to accelerate the digital transformation process by integrating state-of-the-art technologies

- **Optimization of the Lending Process:** Implementing digital solutions to improve operational efficiency and customer experience, ensuring a faster and more efficient lending process.
- **Digitalization and Technological Innovation:** Continuing the use of advanced technologies, such as artificial intelligence, to improve the digital experience, reduce operational effort and enable the provision of fast, secure and customized services tailored to clients' needs.

Human Capital Development: Attracting and retaining talent in technical and support areas in order to provide clients with fast, diverse and customized services.

- **Strengthening Teams:** Continuing efforts to attract talent in technical areas, targeting the strengthening of IT and Quality Management teams. The professional and personal development of employees is essential in order to maintain a high level of performance.
- **Organizational Culture:** Promoting a culture of innovation and continuous learning. Encouraging employees to be proactive in identifying new opportunities and solutions, providing them with the resources and support needed to develop their skills and knowledge.

3.2 Tangible assets

The tangible and intangible assets of the Bank are at a very low level of below 1% (0.4%) of total assets, the Bank's policy Being to invest exclusively in projects essential for the optimization of operations.

Their situation as at 31,12,2025, compared with the year 2024 is presented below :

In RON	2025	2024	2023
Tangible assets	44,105,909	51,341,936	53,423,017
Intangible assets	1,460,587	2,611,783	3,285,911
Total	45,566,496	53,953,719	56,708,928

The situation of property, plant and equipment by main groups for accounting and depreciation is presented below:

	2025		2024	
Buildings	1,614,257	3.66%	1,852,870	3.61%
IT equipment and others	6,028,744	13.67%	4,251,127	8.28%
Motor vehicles	601,607	1.36%	77,262	0.15%
Assets in progress	359,311	0.81%	1,368,124	2.66%
Right of use from lease operations	35,501,990	80.49%	43,792,553	85.30%
Total	44,105,909	100%	51,341,936	100%

The tangible assets of the Bank include mainly the right of use under lease contracts and the assets used by the branches and the head office of the Bank, all of these operating in rented premises.

3.3 Market of securities issued by the bank

During the years 2023, 2024 and 2025 Libra Internet Bank S.A. did not issue bonds.

In 2022, the Bank successfully placed the third issue of LIBRA32E registered, dematerialized, unsecured and non-convertible bonds, denominated in EUR, with an individual nominal value of EUR 500/bond and a total nominal value of EUR 4,262,000 over 10 years with an interest rate of 6.5%/year.

In 2021, the Bank successfully placed the second issuance of MREL (minimum requirement for own funds and eligible liabilities) LIBRA28E registered, dematerialized, unsecured and non-convertible senior bonds in amount of EUR 40,000,000 over 7 years with an interest rate of 4.25%/year.

The first LIBRA30E bond issue (from 2020) in amount of EUR 4,296,500 over 10 years, with an interest rate of 5% is traded on the Multilateral Trading System (MTS) of the Bucharest Stock Exchange, and the LIBRA28E and LIBRA32E bond issues are traded on the main segment of the Bucharest Stock Exchange, Corporate Bonds category.

The bank pays the interest coupons and the principal related to these issues according to the Prospectuses (LIBRA28E, LIBRA32E) and Memorandum (LIBRA30E). As of 31 December 2025, there were no outstanding payment obligations resulting from these issues.

In the last three years the Bank has granted dividends both from the profit of the current year, as well as from Other reserves from profit, the total value of these being presented in the table below:

	2025	2024	2023
Net profit realized	324,048,123	270,221,847	317,291,869
Total dividends distributed	-	100,000,000	100,000,000

In January 2024, the Bank increased the share capital by RON 50,006 million, by incorporating the reserves from the profits of the years 2018 and 2019, the issue of additional shares being allocated proportionally to the shareholders in accordance with their holdings on the reference date, 15 December 2023. In July 2024, the shareholders approved the distribution of dividends of 100 million RON in cash.

3.4 Corporate governance and Management of the Bank

Corporate governance represents the totality of the principles that underpin the framework for the management and control of the Bank's activity.

Given the trading of the three bond issues on the Regulated Market administered by Bucharest Stock Exchange and on the Multilateral Trading System administered by BVB, corporate governance of the Bank complies with both the principles of the Corporate Governance Code of Bucharest Stock Exchange and the principles of corporate governance that apply to bond issuers on the SMT market (with the particularities arising from the fact that the Bank's shares are not admitted to trading). In addition, the Bank complies with the legal regulations applicable in the field of corporate governance laid down by the legislation in force, including the legislation in the banking field.

Libra Internet Bank S.A. is managed under a unitary split system (the Chief Executive Officer and the Chairman of the Board of Directors being distinct persons), in compliance with the objectives of corporate governance, the transparency of relevant corporate information, the protection of the interests of the various categories of participants and the principles of an efficient operation on the banking market.

Libra Internet Bank S.A. is a Romanian legal entity organized as a joint-stock company, subject to the legislation in force in Romania. The banking operations carried out by the Bank are provided for in its articles of association, are authorized by the National Bank of Romania and are laid down in Government Emergency Ordinance No. 99/2006 on credit institutions and capital adequacy.

The General Meeting of Shareholders (GMS) is the supreme governing body of the Bank, having the powers provided by law and the bank's articles of association. The duties of the General Meeting of Shareholders, the manner of convening, meeting and decision-making are laid down in the bank's articles of association.

The body of management of the Bank (the Board of Directors and the Management Committee) has the duties and responsibilities provided for in the legal regulations in force and in the articles of association of the Bank. According to the articles of association, the management and administration of the Bank is entrusted to the Board of Directors made up of seven directors, of whom one chairman and two vice-chairmen. The majority of the members of the Board of Directors are non-executive directors.

The directors are appointed by AGA and have the duties provided for in the legal regulations in force and in the articles of association of the Bank.

Under the authority of the Board of Directors operate, on a permanent basis, the Audit Committee and the Risk Management Committee, whose composition, governance rules and duties are established in the Bank's internal regulations.

The Board of Directors delegates the management of the Bank to four Directors, appointing one of them as Chief Executive Officer. The other three Directors hold the position of Chief Executive Officer (Deputy). The Chairman of the Board of Directors may not be the Chief Executive Officer of the Bank.

The executive directors may be appointed from among the directors or from outside the Board of Directors.

The four executive directors (the Chief Executive Officer and the three Deputy Chief Executive Officers) form together the Management Committee.

The Chief Executive Officer and the three Deputy Chief Executive Officers are directors of the Bank in the sense given to this term by company law (persons to whom management powers of the company have been delegated by the Board of Directors).

The Board of Directors (the management body in its supervisory function) of the Bank has the duties established by the Articles of Association, updated as of 24.04.2025, in Chapter 17 .

The Board of Directors may delegate part of the powers it holds in lending activity to the Credit Committee and/or the Subcommittee on Credits, but without in any way releasing its supervisory function from collectively exercising its duties and responsibilities.

The decisions of the Board of Directors and of the Management Committee are recorded in the minutes in which, where appropriate, responsibilities and deadlines for carrying out the respective decisions are established.

The Risk Management Division gives a negative or positive opinion on the decisions of the Management Committee and of the Board of Directors, taken under the conditions laid down in the articles of association. The endorsement of the Risk Management Division is brought to the attention of the governing body which takes the decision and does not hinder the decision-making process.

The directors are responsible for taking all measures relating to the management of the company, within the limits of the scope of activity of the company and with due observance of the powers exclusive reserved by law or by the articles of association to the Board of Directors and the General Meeting of Shareholders.

During 2025, the Articles of Association did not undergo any changes, except for the recoding of the activities that may be carried out by the bank according to the Classification of Activities in the National Economy – CAEN Rev.3,

The minimum expected time

The members of the Board of Directors and of the Management Committee complete at the beginning of their term of office a declaration-commitment regarding the time minimum expected for effective participation for the exercise in an appropriate manner of the prerogatives. The declarations are sent to the Division Human Resources for safekeeping.

Organizational structure of the Bank

The divisions represent the first organizational level of this organizational structure and are directly subordinated to the Chief Executive Officer/deputy chief executive officers (members of the Management Committee) according to the organization charts attached to the Regulation on organization and operation. The divisions may include in their structure one or more departments/units.

Also, the structure of the Bank includes the Department of Information Security, subordinated to the director of the Risk Management Division and the Data Protection Officer, subordinated directly to the Chief Executive Officer. At the same time, we mention that responsibilities specific to exercising the role of Compliance Officer rest with a member of the Management Committee, appointed by decision of the Board of Directors.

The persons who lead the Divisions have the position of Division Director, and those who lead the departments/units have the position of Head of Department/ Coordinator of unit / Bank collective.

The division directors/heads of departments/the coordinators of units lead and are responsible for the entire activity of the divisions/departments/units which they coordinate, as well as for the proper fulfilment of any other tasks received and which are related to their area of responsibility. The prerogatives of the directors of divisions/heads of departments/units, as well as those of the executive staff, are stipulated in their job descriptions; the standard model of the job description is the annex to the Internal Organization Regulation.

The main duties of the divisions/departments/units/branches are described in Chapter III of the Regulation on Organization and Operation. Likewise, the divisions/departments/units of the Bank are assigned duties through the rules and procedures internal of the Bank and/or through the delegations of authority/the tasks assigned by the bodies statutory competent of the Bank.

The Chief Executive Officer, the Deputy Chief Executive Officers, the division directors and the heads of departments, as well as the branch managers are required to request the opinion of the Legal Division for any contract and/or new project involving the activity or business within the limits laid down by the procedures internal of the Bank. In addition, all the divisions and the units territorial of the Bank are involved in the identification of operational risk.

In the year 2025, in the Bank there were functioned nine (9) committees, one (1) subcommittee and one (1) commission:

- a) Management Committee (CD);
- b) The Cred Committee (CC), to which the Credit Subcommittee is subordinated;
- c) Risk Management Committee (RAC);
- d) Assets and Liabilities Management and Liquidity Management Committee (ALCO);
- e) Audit Committee;
- f) IT Committee;
- g) Security Committee;
- h) Occupational Health and Safety Committee;
- i) IT Changes Committee;
- j) Selection Commission;

The prerogatives, responsibilities and the working procedures of these committees are presented in the Regulation on Organization and Operation and in the Annex – Rules of governance of the committees. The Management Committee coordinates all the above-mentioned committees, with the exception of the Audit Committee and of the Risk Management Committee (which operates under the authority of the Board of Directors).

In order to ensure the conditions optimal for the adoption and implementation at the level of the Bank of the changes in legislation with a significant impact, the Compliance Division has the authority to request the establishment of working committees. These committees will be formed of representatives of the divisions/departments affected by the respective changes, as well as of those who have the necessary competence for their implementation.

The management body may also approve, at the level of the Bank, for various projects, the establishment of working groups or other ad hoc structures, whose composition, responsibilities and working method are determined by the decision establishing them.

The responsibilities of the secretaries of committees/subcommittees are the following:

- a) collecting the proposals submitted by the organizational structures to be submitted to the attention of the Committees;
- b) sending the proposals submitted to the decision committees to the Risk Management Division;
- c) drafting the minutes and monitoring their signing, according to the competences;
- d) obtaining the opinion of the Manager of the Risk Management Division/his/her substitute on the decisions of the Committees, in accordance with the provisions of Annex Governance Rules applicable to Committees;
- e) distributing the decisions of the people involved in their implementation/informing the people involved;
- f) monitoring the implementation of the Committees' decisions by the people responsible;
- g) informing the committees on the state of implementation of the decisions taken;
- h) preservation and archiving of decisions and related documentation;
- i) signing the extracts of the minutes, in order to release the proof of adoption of a decision by the Committee of which they are member.

In the case of the Credit Committee and the Credit Subcommittee, the opinion of the Manager of the Risk Management Division/his/her substitute is required for amounts greater than or equal to the limit of the amount considered material risk in force and for requests in which the Board of Directors is competent.

In the case of the Credit Committee and the Credit Subcommittee, responsibilities a), c), d), e) and i) fall to each analyst individually for the requests analysed, the respective secretaries being responsible only in the case of decisions of a general nature and for keeping in original all the decisions and related documentation filed by the analysts.

In the case of the Credit Committee and the Credit Subcommittee, points f), g) apply only to decisions of a general nature, and the information will take place at the deadline set by the Credit Committee and only for the cases in which the decisions taken have not been implemented.

Points b), d) and h) do not apply to the secretary of the Audit Committee. Point h) does not apply to the secretary of the Credit Committee and the Credit Subcommittee

The categories of staff of which activities of a professional nature have a impact significant on the profile of risk of the Bank ("**Identified Staff**") are established by the decision of the Management Committee of the Bank, based on the opinion of the coordinator of the risk management function, including the members of the Bank's management body, namely: the administrators of the Bank – non-executive members of the Board of Directors (or BoD) and the Bank's directors – members of the Management Committee (or MC) of the Bank ("senior management"), employees under management contracts.

Persons who hold key functions – members of staff who have a significant influence on the orientation of the credit institution, who are not members of the management body. This category of persons includes the coordinators of internal control functions, where they are not members of senior management, the persons designated to ensure the management of structures relating to risk management, internal audit and compliance, where the coordinators of internal control functions are members of senior management, as well as the persons designated to ensure the management of structures relating to legal, treasury, lending activities and any other activities that may expose the credit institution to significant risks. In this category, without being limited to this, the directors whose line of business accounts for a minimum of 20% of the portfolio structure (mainly loans) at the date of the policy review are included.

The process of appointing the persons who belong to the category of "Identified Staff"/"Persons who hold key functions" within Libra Internet Bank is detailed in the Policy on diversity, recruitment and selection, performance management (including the assessment of individual and collective suitability), and training for identified staff and key functions.

At the date of 31,12,2025 – **the Board of Directors** had the following structure:

First name Surname	Position held on the Board of Directors	Date of approval in office	Term of office
Radu Gratian Ghetea	Chairman	2019	4 years (with extension)
Cristina-Carmen Mahika-Voiconi	Vice-Chairman	1996	4 years (with extension)
Eugen Goga	Vice-Chairman	2007	4 years (with extension)
Ovidiu Petre Melinte	Member	2004	4 years (with extension)
Mihaela Sirbu	Member	2013	4 years (with extension)
Lucian Claudiu Anghel	Member	,2024	4 years
Andrei - Liviu Stamatian	Member	2025	4 years

In 2025 the term of office as administrator (non-executive, independent) of Mr Andrei-Liviu Stamatian began, after the prior approval of the National Bank of Romania for this appointment was obtained. The members of the Board of Directors do not hold any shares in the Bank's share capital.

The professional training of the administrators is as follows:

Radu Gratian Ghetea

School of Business INSEAD - the program of governance modern in the field of banking (2018-2019), Academia de Studii Economice, Doctorate in Economics - Accounting, Facultatea de Matematică - Universitatea București;

Ovidiu Petre Melinte

The program of MBA Romanian-Canadian - Master's degree in Business Administration, Institutul Politehnic București;

Cristina Carmen Mahika Voiconi

ASEBUSS - Master's degree in Business Administration, Academia de Studii Economice București;

Eugen Goga

ASEBUSS - Master's degree in Business Administration, Academia de Studii Economice București;

Mihaela Sirbu

Case Western Reserve University, Weatherhead School of Management - Master's degree in Business Administration, Academia de Studii Economice București;

Lucian Claudiu Anghel

Georgetown University Washington DC- Bank Risk Management, Henley Business School UK- Corporate governance

ASE -Faculty of Cybernetics, Statistics and Economic Informatics, Bucharest - Doctorate in Cybernetics and Economic Statistics

Andrei-Liviu Stamatian

INSEAD, France – Master's degree in Business Administration; Stanford University, CA, USA – Bachelor's degree in Economics and secondary specialization (minor) in Industrial Engineering

The executive management of the Bank is carried out in accordance with the legislation on banking in force, by **the Committee of Management** - composed of the following persons at the end of the year 2025:

Last name First name	Position held within the Management Committee	Seniority within the Management Committee	Duration of the current term
Cristina-Carmen Mahika-Voiconi	Chief Executive Officer	2004	4 years (with extension for the duration of the mandate as a member of the Board of Directors)
Eugen Goga	Deputy Chief Executive Officer	2007	4 years (with extension for the duration of the mandate as a member of the Board of Directors)
Ionel Umbreș	Deputy Chief Executive Officer	2018	4 years (with extension)
Lucian Claudiu Anghel	Deputy Chief Executive Officer	2024	4 years (with extension for the duration of the mandate as a member of the Board of Directors)

The members of the Management Committee do not hold any interests in the share capital of the Bank.

There are no ongoing litigations or administrative proceedings in the last 5 years, nor in the past, involving any member of the Board of Directors of the Bank or of the Management Committee.

The persons affiliated to the Bank are presented

All transactions with the parties affiliated have been concluded on terms similar to those of transactions with parties not affiliated, taking into consideration the rates of interest and the guarantees related. The transactions carried out with the parties affiliated are presented in a separate note to the separate and individual financial statements both for the year ended on 31,12,2025, as well for the comparative period.

Thus, in the year 2025 no have been identified situations that would run counter to the Bank with regard to insiders, persons exercising management responsibilities, as well as persons who have a close relationship with them, no transactions having been carried out in the year 2025 on their behalf in connection with the Bank's shares or debt securities or with derivative financial instruments or other financial instruments related thereto, as regards the Bank.

Conflict of interest

In order to prevent conflicts of interest, employees must avoid and refrain from any activity that is contrary to the interests of Libra Internet Bank S.A and/or those of its clients, being under an obligation to report any situation of a conflict-of-interest nature and to cooperate with the responsible organizational structures, in order to resolve and manage efficiently any such situations.

During the year 2025 no situations of a conflict-of-interest nature were identified between the members of the Management Body and the interests of the Bank, which would require informing the Băncii Naționale a României.

3.5 Financial and accounting position

3.5.1 Considerations regarding the Romanian banking system in 2025

In the year 2025, the Romanian banking system operated through 29 credit institutions, a number lower than in the previous year as a result of consolidation processes and mergers in the market. Total net assets continued their upward trend, recording an increase of approximately 9–10%, reaching a level of around 958 billion Romanian RON, supported by the positive evolution of deposits and lending.

According to BNR data, the total stock of non-government credit continued to grow in 2025, in line with the dynamics of previous years. The currency structure maintains the already familiar profile: lending in RON remains dominant and is expanding at a faster pace than lending in foreign currency.

The prudential indicators of the banking system remain at comfortable levels, although slight adjustments can be observed. The solvency ratio- stood at around 24%, slightly below the level of the previous year but well above the minimum requirements. The non-performing loans ratio- stood at around 2,7%, an evolution that reflects macroeconomic pressures.

In terms of profitability, the ROA and ROE indicators s-tayed relatively stable, at around 1,7% and 17–18%, respectively, an evolution influenced by the increase in the cost of risk and the gradual narrowing of margins. Even in this context, the banking sector continued to generate robust profits, supported by operational efficiency and the high level of net interest income.

Overall, the Romanian banking system performed well in 2025, maintaining a solid capital and liquidity position and continuing to provide support to the real economy. At the same time, the year was marked by significant consolidations in the market, which led to increased sector concentration and more efficient banking operations. Although some adjustments can be seen in asset quality and profitability, they fall within a context-of challenging macroeconomic conditions, without affecting the stability of the system.

	Dec-25	Dec-24	Variation
Number of credit institutions	29	32	-9.38%
Total net assets (RON billion)	957.6	881.8	8.60%
Assets of private equity institutions ¹ (% of total assets)	85.7	85.7	0%
Assets of institutions with foreign capital ² (% of total assets)	63.2	62.4	+1.28%
Solvency ratio ($\geq 8\%$) (%) [*]	24.36	24.91	-2.21%
Leverage ³ (%) [*]	8.55	8.57	-0.23%
Impaired receivables ⁴ (% of total loans)	1.18	0.94	+25.53%
ROA ⁷ (%)	1.68	1.68	0%
ROE ⁸ (%)	17.63	18.44	-4.39%
Rate of return on core business ⁹ (%)	200.50	196.76	+1.90%
Loans granted / Deposits attracted ¹⁰ (%)	67.30	67.61	-0.46%
Non-performing loan ratio as defined by EBA ¹¹ (%) [*]	2.69	2.48	8.47%

Source: NBR

3.5.2 Presentation of the bank's financial position in the year 2025

Throughout the year 2025, Libra Internet Bank S.A. focused on fulfilling its mission and achieving the strategic objectives set for this year.

The Bank continued to provide financial support to its clients, including companies, professionals, real estate projects, agriculture and individuals, while seeking to improve operational efficiency and increase productivity at all levels. This approach is aligned with the Bank's strategy for the period 2025-2027, which includes expanding lending activity, digitalizing processes and strengthening its market position through innovation and strategic partnerships.

The individual financial statements and separate financial statements of the Bank as of 31.12.2025 were prepared based on the Bank's summary trial balance.

3.5.2.1. Separate balance sheet

(In RON)		2025	2024	2023
Assets	Petty cash	61,953,218	89,282,554	101,127,160
	Financial assets at fair value through profit or loss	21,374,485	20,453,208	17,413,749
	Loans and advances at the National Bank of Romania	1,921,623,531	2,282,980,518	1,970,710,014
	Loans and advances to banks	915,792,479	959,943,957	602,745,556
	Loans and advances to customers	8,398,579,405	7,196,501,880	6,602,344,809
	Investment securities at amortized cost	2,357,090,250	1,967,390,959	1,696,152,460
	Investment in associates	9,800,000	9,800,000	9,800,000
	Assets held for sale	232,302	613,302	699,637
	Tangible assets	44,105,909	51,341,936	53,423,017
	Intangible assets	1,460,587	2,611,783	3,285,911
	Deferred tax assets	8,880,734	7,995,231	6,537,079
	Current tax assets	-	5,055,830	-
	Other assets	161,489,956	120,682,460	124,248,426
	Total assets	13,902,382,857	12,714,653,618	11,188,487,818
Liabilities	Customer deposits	11,671,054,227	10,827,475,936	9,460,439,836
	Deposits from other banks	1,936,730	853,213	49,016,014
	Loans from financial institutions	8,259,261	6,260,852	9,413,200
	Bonds issued	249,138,016	242,558,835	242,122,561
	Subordinated loan	76,217,279	74,259,371	39,618,772
	Provisions	50,941,339	45,662,759	39,861,820
	Current tax liabilities	5,077,510	-	6,824,786
	Other liabilities	85,582,754	87,455,036	81,285,059
	Total liabilities	12,148,207,118	11,284,526,002	9,928,582,048
Equity	Share capital	556,171,200	556,171,200	506,165,200
	Reserves	338,306,723	319,313,597	353,409,075
	Retained earnings	859,697,816	554,642,819	400,331,495
	Total equity	1,754,175,739	1,430,127,616	1,259,905,770
	Total liabilities and equity	13,902,382,857	12,714,653,618	11,188,487,818

3.5.2.2. Separate profit or loss account

(In RON)	2025	2024	2023
Interest income calculated using the effective interest method	969,863,468	914,795,542	843,315,442
Interest expense	-303,623,096	-296,533,618	-269,452,225
Net interest income	666,240,372	618,261,924	573,863,217
Fee and commission income	151,312,857	149,679,843	103,819,890
Fee and commission expense	-64,511,381	-66,021,228	-31,832,302
Net fee and commission income	86,801,476	83,658,615	71,987,588
Net income from financial instruments at FVTPL	2,315,217	3,278,965	3,146,251
Net gain from foreign exchange transactions and revaluation	72,365,270	54,065,995	47,237,676
Other operating income	9,114,424	7,039,121	7,484,792
Total operating income	836,836,759	766,304,620	703,719,524
Personnel expenses	-288,061,566	-233,341,771	-191,077,467
Amortization and depreciation	-20,187,146	-19,059,171	-18,008,907
Other operating expenses	-145,905,374	-117,919,659	-85,963,912
Total operating expenses	-454,154,086	-370,320,601	-295,050,286
Profit before impairments and tax	382,682,673	395,984,019	408,669,238
Net income (expenses) with Impairment losses on financial instruments	-2,820,144	-77,773,579	-41,457,788
Profit before tax	379,862,529	318,210,440	367,211,450
Corporate income tax expenses	-55,814,406	-47,988,593	-49,919,581
Net profit for the financial year	324,048,123	270,221,847	317,291,869
Other comprehensive income	-	-	-
Total comprehensive income for the financial year	324,048,123	270,221,847	317,291,869

3.5.2.3. Separate statement of cash flows

In RON	2025	2024
Cash flows from operating activities:		
Net profit	324,048,123	270,221,847
Adjustments for non-cash items:		
Depreciation and amortization	20,187,146	19,059,171
Loss from disposal of intangible assets and fixed assets	3,151	2,780
Net loss on sale of repossessed asset	-	-467,335
Net (income)/ expenses with provisions	5,303,179	5,889,413
Net loss from measuring financial instruments at fair value through profit or loss	-2,315,217	-3,278,965
Net (income)/expenses on impairment of financial instruments	51,606,760	112,285,799
Dividends	-1,881,698	-1,456,207
Interest expense	303,623,095	296,533,618
Interest income calculated using the effective interest method	-969,863,471	-914,795,542
Share of (gain)/loss from associates	-	-
Corporate income tax expense	55,814,406	47,988,593
Other adjustments	4,739,045	273,709
Total adjustments	-532,783,604	-437,964,966
In RON	2025	2024
Changes in:		
(Increase)/ Decrease of other assets	-31,560,214	-7,314,269
Increase/ (Decrease) of other liabilities	8,021,871	9,459,562
Increase/ (Decrease) of deposits from clients	844,958,065	1,368,306,478
Increase/ (Decrease) of deposits from other banks	69,598	-48,162,801
(Increase)/ Decrease of loans and advances to clients	- 1,250,671,920	- 708,822,190
Total changes	-429,182,600	-613,466,779
Tax paid	-46,566,570	-61,327,362
Assignment of contracts	-	5,336,294
Interest paid	-283,958,616	-280,004,144
Interest received	824,284,958	790,769,274
Net cash used in operating activities	144,158,307	900,497,721
Net cash from investment activity:		
Purchases of intangible assets	-653,627	-1,018,874
Purchases of property, plant and equipment	-4,197,453	-3,296,459
Sales of property, plant and equipment	382,344	218,162
Purchases of financial assets at fair value through profit	-	-
Purchases of securities	-949,972,226	-525,098,422
Sales of securities	582,731,550	272,857,755
Dividends received	1,881,698	1,456,207
Assets held for sale	381,000	467,335
Interest received on securities	125,140,567	101,851,729
Net cash used in investment activities	-244,005,148	-152,562,566
Cash flows from financing activities:		
Proceeds from subordinated loan	-	34,818,700
Payment of subordinated loan	-5,849,298	-4,005,662
Proceeds from bonds issued	-	-

In RON	2025	2024
Payments with bonds issued	-11,295,558	-11,050,515
Proceeds from borrowings from financial institutions	5,098,500	-
Repayments of borrowings from financial institutions	-3,496,135	-3,610,006
Lease payments	-19,510,065	-17,643,475
Proceeds from assignment of loans to NBFIs	-	-
Dividends paid	-	-100,026,250
Net cash from financing activities	-35,052,557	-101,517,208
Net increase/(decrease) in cash and cash equivalents	-423,517,010	646,417,948
Effect of exchange rate fluctuations on cash and cash equivalents held	-	-
Cash and cash equivalents at 1 January	3,357,255,561	2,710,837,612
Cash and cash equivalents at 31 December	2,934,073,382	3,357,255,561

In the year 2025, Libra Internet Bank recorded the highest profit in its history, in the amount of 324 million RON. Net assets increased by over 9% compared with the previous year and by 45% over the last five years, above the growth rate of the banking sector.

Operational efficiency remained at a solid level, supported by rigorous cost management and by the acceleration of process digitalization.

The gross loan portfolio recorded an advance of almost 17% compared with the end of 2024, a pace that exceeded the overall evolution of the banking system and reflected the Bank's ability to support the financing of the real economy.

Customer deposits increased by over 8%, reaching 11,5 billion RON, an increase above the sector average. The non-performing loan ratio, according to the EBA definition, stood at 2.24% in December 2025, up from 2.06% in 2024, but still below the banking system average, which was at the level of 2.69% in December.

In addition to the good financial performance, the Bank also ensured coverage of impaired loans with provisions at a level of 70.41%, in increase compared with 68.37% recorded as of 31 December 2024.

In 2025, Libra Internet Bank continued to develop new technological solutions and to provide support to customers, consolidating its position on the market through innovation and digitalization.

3.5.3. Analysis of operating costs

Operating expenses, including depreciation, recorded in 2025 an increase of over 22% compared with the year 2024. This evolution is generated mainly by the increase in other operating expenses, significantly influenced by the increase of the turnover tax from 2% to 4%, applicable starting with July 2025.

Personnel expenses continued the annual upward trend, as a result of the expansion of the base of employees by over 5% and of the associated benefits.

	2025	2024	2023	Variation 2025/2024
Personnel expenses	-288,061,566	-233,341,771	-191,077,467	23.45%
Depreciation and impairment	-20,187,148	-19,059,171	-18,008,907	5.91%
Other operating expenses	-145,905,374	-117,919,659	-85,963,912	23.73%
Total operating expenses	-454,154,086	-370,320,601	-295,050,286	22.63%

3.5.4. Asset and liability management

The strategy of Libra Internet Bank S.A. in managing liquidity falls within the general development strategy of the Bank, whose main strategic objectives are strengthening the position in the SME sector and that of the liberal professions, expansion in the agricultural segment, financing projects in the real estate field, managing the quality of the loan portfolio and controlling costs.

The main objective of Libra Internet Bank S.A. in managing liquidity is to adopt and maintain an optimal structure of the Bank's assets and liabilities, which allows:

- Maximizing the net interest income recorded by the Bank, at an asset-determined level;
- Aligning interest rates with market developments and adjusting them according to the liquidity needs of the Bank;
- Carrying out the activities of the Bank under optimal conditions, in accordance with the strategy established, with the avoidance, as far as possible, of the dysfunctions that may arise as a result of taking on high risks in the area of liquidity;
- Minimizing any negative effects that may arise during crises, with regard to the liquidity of the Bank.

More precisely, in the development plan of the Bank for 2025 for the management of assets and liabilities and liquidity management, the following aspects were taken into consideration:

The correlation quantitative and qualitative of the financial resources used by the bank (in particular between the resources attracted from natural persons and legal persons – depositors) with the volume of investments; in this sense, the following were taken into account:

- a) The dispersion of the sources attracted from as many depositors as possible, by currencies (in correlation with the structuring of placements by currencies) and by horizons of time appropriate (short, medium, long);
- b) Maintaining permanent communication with the stable clients of the Bank, suppliers of resources, in the category of large depositors, both at the level of the territorial units, as well as at the centralized level, so that the intentions and availability of these with regard to the investments carried out by the Bank;
- c) Together with the evolution of the resources attracted, there was analysed also the provision adequate of provisions for the funds own in order to maintain the stability financial of the Bank and creditworthiness; the requirement of the adequacy of own funds to the risks to which the bank is exposed was fulfilled.

Improvement of the policy for attracting resources in close correlation with the lending policy, by consolidating the link between the strategy for attracting resources and the lending strategy through:

- a) management of the margins between the interest rates of assets and liabilities;
- b) satisfactory management of liquid assets in correlation with the evolution of the attracted sources (in terms of the typology of clients, currencies and maturities);
- c) improvement of the activity of cross-selling

It is also pursued:

- Maintaining a low level of the volume of tangible fixed assets and of the costs generated by: outsourcing (requesting services provided by specialized companies for a series of activities), reducing the areas within the branch perimeter, renegotiating lease contracts or relocating the units in which the Bank carries out its activity;
- Extending the online sales channel;
- Establishing minimum levels of liquidity (expressed through liquidity indicators) and monitoring them at appropriate time intervals (intra-day or terms of very short, medium and long duration);
- Ensuring the segregation of duties and the independence of the functions that are operational and those regarding the monitoring of the liquidity situation of the Bank;

- Establishing and maintaining at least a minimum level of eligible financial assets that can be used in transactions for obtaining of liquidity (by transforming them into liquidity or by using them in collateralized transactions), under normal conditions and in liquidity crisis conditions, to the extent that the eligible financial assets are considered to be government bonds and certificates of deposit issued by the Ministry of Finance or by the National Bank of Romania;
- Carrying out activities exclusively in convertible currency;
- Increase of the card portfolio and of card payment services by card;
- Establishing and maintaining working lines with other banks that are the most active on the domestic market regarding activities interbank on the money market, the foreign exchange market, government securities and bonds in particular on the Romanian market or on the European market;
- Establishing and maintaining the steps for accessing of funding lines, guaranteed by European bodies. Assessing the implications that settlement activities may have on the liquidity position of the Bank and on other potential risks. To this end, Bank requests the provision of depositary and custody services only from institutions organized for the provision of services that are adequately regulated and supervised by the financial-banking supervisory authorities of the EU and EEA member states;
- Positioning the Bank at a high level in respect of new technologies for the purpose of streamlining processes in order to obtain low operating costs and entering into advantageous partnerships with Big Data analytics companies and FinTech companies.

The total net profit resulting from the activity of raising and placing funds, calculated based on the structure of assets and liabilities, was 666 million RON in 2025, compared to 618 million RON in 2024.

The efficient monitoring of the liquidity of the Bank was carried out on the basis of the liquidity management strategy, through the ongoing supervision of liquidity and forecast fluctuations, in correlation with the budget of the Bank approved annually and through the indicators, models and scenarios whose adequacy and complexity are reviewed periodically.

According to the strategy, Bank had to permanently maintain an adequate level of liquid assets, depending on the volume and the structure of the resources attracted.

The Bank consistently observed the limits laid down in its own strategy and risk profile, keeping the key indicators – including immediate liquidity indicators, the share of gross loans in total funds attracted and in total gross assets, liquidity indicators by maturity buckets, the internal liquidity indicator and the level of concentration of resources by depositors – within the approved parameters.

3.5.5. Attracted resources

The main resources attracted by the Bank in 2025 consisted of deposits and current accounts attracted from individuals and legal entities.

The structure of these resources is presented below:

Resources attracted from the clients (in RON)	2025	2024	Variation 2025/2024
Current accounts	4,355,725,823	4,279,744,127	1.78%
Individuals	812,967,776	736,048,803	10.45%
Legal entities	3,542,758,047	3,543,695,324	-0.03%
Total deposits	7,315,328,404	6,547,731,809	11.72%
Term deposits	7,061,509,629	6,260,012,068	12.80%
Collateral deposits	253,818,775	287,719,741	-11.78%
TOTAL CUSTOMER RESOURCES	11,671,054,227	10,827,475,936	7.79%

The volume of funds attracted from clients has increased by 8%, while the balance of gross loans has increased by almost 17%. The utilization ratio of gross loans/deposits is at 71.96%.

In addition to the resources attracted from clients in the form of deposits and current accounts, the Bank has resources attracted from foreign financial institutions: FEI and EFSE, Romanian banks.

The structure of the total resources of the Bank is presented below:

(In RON)	2025		2024	
Resource type	Volume	%	Volume	%
Treasury resources	335,551,287	2.79%	323,932.271	3.47%
Loans from financial institutions	8,259,261	0.07%	6,260.852	0.10%
Subordinated loan	76,217,279	0.63%	74,259.371	0.40%
Bond issues	249,138,016	2.08%	242,558.835	2.47%
Loans from banks	1,936,730	0.02%	853,213	0.5%
Customer resources	11,671,054,228	97.10%	10,827,475,936	96.53%
Current accounts	4,355,725,823	36.28%	4,279,744,127	38.75%
Customer deposits	7,315,328,404	60.93%	6,547,731,809	57.78%
TOTAL BORROWED FUNDS	12,006,605,514	100%	11,151,408,207	100%

At 31 December 2025, the ratio between the balance of loans gross and the balance of resources attracted from customers, as well as that between gross loans and total net assets met the budget limit and were as follows:

	2025	2024
Gross loans / Total resources attracted from customers	69.38%	64.41%
Gross loans/ Total net assets	62.53%	58.59%

3.5.6. Investments and lending activity

During the year 2025, the lending activity was carried out with the same business lines as in the year 2024. The segments of business of Bank are: individual persons, companies small (SMEs, liberal professions and agriculture), large companies (companies with a turnover above 4 million EUR), treasury, others and General Management.

The structure of the loans granted by these segments commercial for lending is presented below:

	2025	2024
Individuals	8%	11%
Small-sized companies	31%	33%
Large companies	61%	56%
Treasury	-	-
Others & GM	-	-
Total	100%	100%

The gross portfolio of gross loans as at 31 December 2025 amounts to 8,693,566,682 Romanian RON, with an increase of ~17% compared with 31 December 2024, when its value was 7,449,216,001 Romanian RON.

Presentation of the loan portfolio	31 Dec 2025	31 Dec 2024
Performing portfolio	8,432,435,500	7,227,177,744
Non-performing portfolio	261,131,182	222,038,256
Total loans gross	8,693,566,682	7,449,216,001
Minus: the provisions for credit risk	-294,987,277	-252,714,120
Total net loans	8,398,579,405	7,196,501,880

In the year 2025, the portfolio of net loans has increased by 17%, while the balance of provisions for the risk of credit has increased by 17% due to a prudent credit risk management policy.

The Bank holds assets financial at cost amortised ("AC") in the form of loans and advances granted to customers, loans and advances granted to banks and securities of debt. For financial assets measured at AC, the expected loss from impairment reduces the gross carrying amount and is recognised in profit or loss.

Starting from 1 January 2018, all banks, including LIBRA INTERNET BANK S.A., have begun to apply IFRS 9 – Financial Instruments, which introduces a new model for the recognition of impairment losses, called and the expected credit loss (ECL), where there is a approach “in three stages” which is based on the change in the credit quality of financial assets since initial recognition.

The table below presents information regarding the quality of the credit of the financial assets measured at amortised cost (including loans). Except where expressly stated otherwise, for financial assets, the amounts in the table represent gross carrying amounts. Customers are classified into 4 risk categories representing the following:

- **Standard** – all financial assets measured at amortised cost that are current or past due by less than 30 days and that are not on the Watch list;
- **>30 days** – all financial assets measured at amortised cost, past due by more than 30 days and that are not impaired;
- **Watchlist** – Financial assets measured at amortised cost that are identified as having increased credit risk based on the internal procedure and are classified either in Stage 2 or in Stage 3 – only if conditions of unlikelihood to pay are identified;
- **Loss** – Financial assets measured at amortised cost included in Stage 3.

The structure of financial instruments by stages of credit risk in 2025 is presented below:

2025				
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances to customers at amortized cost				
Current	7.457.163.752	511.041.069	28.363.922	7.996.568.744
<=30 days	68.655.482	86.037.352	19.385.913	474.078.747
<=90 days	-	9.537.844	161.441.287	170.979.131
<= 180 days	-	-	23.570.207	23.570.207
> 180 days	-	-	28.369.853	28.369.853
Total	7.825.819.234	606.616.265	261.131.182	8.693.566.682
Loss allowance	-59.053.228	-52.081.644	183.852.404	- 294.987.277
Book value	7.766.766.007	554.534.620	77.278.778	8.398.579.405

2025				
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances granted to customers				
Standard	7.825.819.235	-	-	7.825.819.235
>30 days	-	9.537.844	-	9.537.844
Watchlist	-	597.078.420	-	597.078.420
Loss	-	-	261.131.182	261.131.182
Loss allowance	-59.053.228	-52.081.644	-183.852.404	-294.987.277
Book value	7.766.766.007	554.534.620	77.278.778	8.398.579.405
2025				
RON	Stage 1	Stage 2	Stage 3	Total
Credit undertakings and financial guarantee agreements				
Standard	3.196.710.006	-	-	3.196.710.006
>30 days	-	217.187	-	217.187
Watchlist	-	103.507.643	-	103.507.643
Loss	-	-	174.339	174.339
Loss allowance	-2.884.066	-683.586	-5.510	-3.573.162
Book value	3.193.825.940	103.041.244	168.829	3.297.036.013

At 31 December 2025 the Bank held loans and advances to banks in the amount of 2,837,750,840 RON (31 December 2024: 3,243,264,505 RON). Among these, loans and advances to the National Bank totalled 2,072,036,773 RON (31 December 2024: 2,384,889,039 RON) holding the BBB rating - based on the ratings issued by Fitch.

On 31 December 2025, the investment securities at amortised cost consisted of 92% government securities issued by the Government of Romania and 8% municipal bonds, compared to 31 December 2024, when the structure was 92% government securities and 1.2% municipal bonds.

On 31 December 2025, the gross portfolio of investment securities at amortised cost held by Libra Internet Bank S.A. was structured 27% with maturity of up to one year, 68% with maturity between 1 and 5 years and 5% with maturity of more than 5 years.

The portfolio of shares held by the Bank in other commercial companies at the end of the year 2025 comprised 172 shares (2.56%) in Societatea De Transfer De Fonduri Și Decontări TRANSFOND S.A., 34 shares in Society for WorldWide Interbank Financial Telecommunication - S.W.I.F.T., 74,985 shares (0.18%) in Biroul de Credit S.A., 499,836 shares (0.98%) in Elvila S.A., 999 shares (9.99%) in SOPAS - Servicii Financiare & Leasing S.A., 731 shares in Visa Inc and 980,000 shares (49%) in the associate company LIBRA DEVELOPMENT IFN.

In 2025 the income from dividends have been in the amount of 1,881,698 RON while in the year 2024 were 1,456,207 RON.

3.5.7. Investments

Libra Internet Bank S.A. recorded investments in tangible and intangible asset projects for the current activity and for supporting the growth of the budgeted business.

The total investments made by Libra Internet Bank S.A. in 2025 in tangible and intangible asset projects amounted to 4,840,092 RON compared to 4,315,333 RON in 2024, the largest share being represented by IT equipment (58%) and software (14%).

With regard to the assessment of solvency, liquidity and the structure of assets we note the following important aspects:

- **The total capital ratio**, also called the solvency ratio, is calculated as the ratio of own funds to risk-weighted assets;
- **The cost-to-income ratio** is an efficiency ratio calculated as the ratio of operating expenses to total income;
- **Return on assets – ROA** is calculated as annual net profit divided by the average net assets of the year;
- **Return on Equity-ROE** is calculated as net profit for the financial year, divided by the average capital for the year;
- **The liquidity coverage ratio**, calculated as the ratio between the actual liquidity and the liquidity required according to the legal norms in force of the National Bank of Romania (LCR ratio)

Indicator name	Banking system December 2025	2025	2024	2023
Solvency ratio	2436%	24.32%	22.49%	18.22%
Return on Equity (ROE)	17.63%	20.35%	20.09%	26.52%
Return on Assets (ROA)	1.68%	2.43%	2.26%	3.04%
Leverage (%)	8.55%	10.49%	10.91%	9.35%
EBA defined NPE ratio (AQT 3,2)	2.69%	2.24%	2.06%	1.52%
Annual growth rate of increase in total assets	8.59%	9.34%	13.64%	15.1%
Ratio of loans to deposits	67.30%	69.38%	64.41%	69.62%
Indicator of coverage of the liquidity requirement (LCR) (LIQ_17)	n/a	285.48%	300.39%	234.94%
Indicator of immediate liquidity	n/a	42.68%	45.42%	43.63%

3.5.8. Structure of the shareholding and share capital

The share capital of the Bank, fully subscribed and paid in full, is in the amount of 512,622,000 RON and is divided into 23,301 registered shares with a nominal value of 22,000 RON each.

The accounting capital of Bank recorded in the balance sheet in the amount of 556,171,200 RON also includes the adjustment for inflation as a result of the application of International Accounting Standard IAS 29 for hyperinflationary economies in the period 1997-2003 in the amount of 43,549,200 RON.

On 31 December 2025 the shareholding structure remained unchanged compared to the previous year, being that resulting from the capital increase approved by the Resolution of the General Meeting of Shareholders no. 1 of 22.12.2023, registered with the Trade Register on 29.01.2024, namely:

Broadhurst Investments Limited	66.67525%
Romarta S.A.	27.5653405%
Andrei Siminel Cristian	5.7293678%
Other shareholders (<1%)	0.0300416%
Total	100.00%

3.5.9. Banking operations

In 2025, the total number of operations carried out by the bank decreased by 45.89%, and productivity decreased by 43.37%, as a result of the increase in the degree of automation of operations and the intensification of the use of online banking services.

The variation compared to the year 2024 is presented below:

	2025	2024	Variation
Number of operations	19,355,700	42,179,901	-54.11%
Productivity (number of operations per employee)	11,676	26,923	-56.63%
Banking operations using Internet Banking	12,689,058	10,859,185	16.85%
Banking operations using Internet Banking in total operations	61,45%	62,77%	-1.32%

3.5.10. Card activity

The activity of issuing cards

At the end of the year 2025 Libra Internet Bank S.A. has had 113,196 cards valid issued both for natural persons as well as for companies. There are 5 types of debit cards for natural persons, 4 types of debit cards for companies, 2 types of credit cards for natural persons and 1 type of credit card for legal entities.

	Cards of debit	Cards of credit
Individuals	76,738	1,321
Legal entities	34,951	186
TOTAL	111,689	1,507

The evolution of the operations of issuing cards in the year 2025 is presented in the table below:

	Issuance transactions 2025		Issuance transactions 2024		2025 vs 2024	
	Number	Value	Number	Value		
Card transactions						
Cash transactions	820,108	1,398,750,659	835,880	1,349,581,293	-1.89%	3.64%
Transactions at retailers	8,976,197	2,539,553,885	8,261,281	2,165,785,556	8.65%	17.2522%
Query transactions	186,751	n/a	146,746	n/a	27.26%	n/a
Miscellaneous transactions	242,067	209,466,236	242,526	212,296,037	-0.18%	-1.33%
Grand total	10,225,123	4,147,770,751	9,486,433	3,727,662,886	7.78%	11.27%

Card acceptance activity

The value of the transactions recorded in the card acceptance during the year 2025 increased by 25.18%, and their evolution by type of transactions is presented in the table below:

Transactions with Libra Internet Bank ATM / POS cards	ATM&POS Acceptance		ATM&POS Acceptance		2025 vs 2024	
	2025		2024			
	Number	Value	Number	Value	Number	Value
ATM transactions	758,535	992,453,310	563,245	663,681,650	34.67%	49.54%
POS transactions	21,427,961	3,497,065,574	18,863,982	2,922,812,239	13.59%	16.85%
Grand total	22,186,496	4,489,518,884	19,427,227	3,586,493,889	14.20%	25.18%

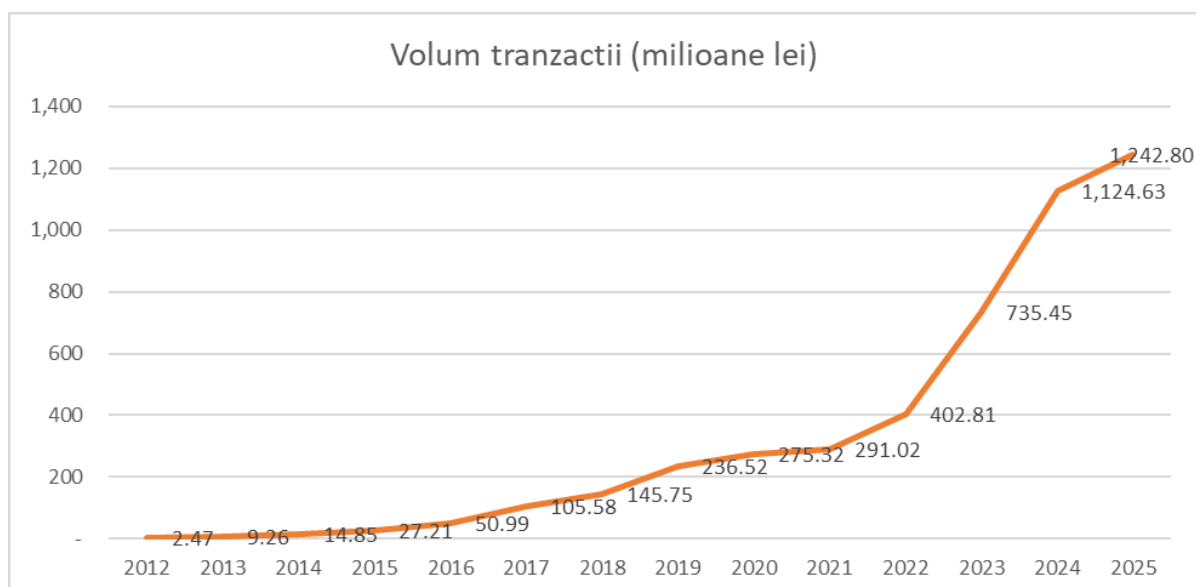
The value of the transactions recorded in 2025 at the e-commerce acquiring terminals has decreased by 2.39%, and their evolution compared with the year 2024 is presented below:

Total LibraPay Transactions at retailers (no portability)	E-commerce acceptance		E-commerce acceptance		2025 vs 2024	
	2025		2024			
	Number	Value	Number	Value	Number	Value
Librapay commercial transactions	1,926,198	688,945,221	2,259,330	705,786,447	-14.74%	-2.39%

3.5.11. eBusiness

The eBusiness division coordinates and manages the system electronic for payments Libra Pay and the system API Banking on the basis of which are provided also the services of collaboration with Fintech companies in the field of payments and collections.

LibraPay is a modern electronic payment system with the advantage of a fast settlement between buyer and seller, on the same day of the transaction, being defined by a triple principle for online payments: Security, Support, Simplicity. The evolution of this product is summarized in the chart below.



API (Application Programming Interface) Banking & Fintech partnerships represent a line of business for the bank that emerged as an opportunity considering technological advances, on the one hand, but also the potential for the development of new business models based on API integrations, on the other hand.

Technological advances largely influence also consumer behaviour, so that banking services are becoming more and more “embedded” in third-party environments (applications or other digital channels). The bank has identified this change as a business opportunity by providing API-based banking services to such third-party providers.

Consequently, Libra Internet Bank S.A. has managed to implement several partnerships with Fintech-type companies, such as: Revolut, Wise, Monese, TransferGo, Paysera, Paysafe and in 2025 several new partnerships were successfully implemented. such as Western Union Bank, Ebury Partners.

Information regarding the probable evolution of the bank according to the Budget for the year 2026

Business objectives for 2026

In 2026, Libra Internet Bank S.A. estimated an increase in net assets by 8% and in the loan portfolio by 14%, placing emphasis on traditional business lines, while at the same time maintaining a constant orientation towards new technologies.

The expansion of activity carried out under the conditions of maintaining a capital adequacy ratio of at least 22.11%, with an incentive system based on performance for optimizing sales efficiency.

The budget deficit remains at a high level, with the European Commission estimating a decrease from 8.4% of GDP in 2025 to 6.2% in 2026, as a result of the implemented fiscal consolidation packages. In parallel, inflation is forecast to follow a downward trajectory, but to remain above the desired levels, standing at 6.7% in 2025 and 5.9% in 2026. [profit.ro]

In this macroeconomic context marked by fiscal pressures and moderate consumption, customer behaviour remains difficult to anticipate, given the increasingly heightened sensitivity to price, lending conditions and the quality of digital services. Competition in the banking system is intensifying, with banks adopting increasingly competitive offers and accelerating the pace of innovation in order to meet customer expectations.

Faced with these challenges, the strategy of Libra Internet Bank focuses on strengthening its market position through innovation, digitalisation and strategic expansion of services, in order to maintain the attractiveness of its offering and support medium-term growth.

4. Non-financial statement

Description of Activity

Libra Internet Bank S.A. was established in 1996 and became operational one year later. Since May 2003, the Bank has been part of the American investment group New Century Holdings (NCH), one of the most important foreign investors in Romania. We are committed to generating lasting value for our customers. As the bank that has American shareholding, we are with one step ahead, we think in the future, and we aim constantly to surpass ourselves. Our goal is excellence in business and therefore we constantly strive to offer our customers access to impeccable services.

In 2025, Libra Internet Bank S.A. received the "Award for Leadership in the Age of AI" at the CEO's Gala organised by Wall-street.ro, for the Libra Voice artificial intelligence service within the mobile banking application and the "Award for Banking Product of the Year in the savings category" at the Awards Gala of Piața Financiară Magazine.

The organisational culture of the Bank is focused on seven defining values: the customer, high standards with respect to one's own activity, success as a motivating factor, the spirit of competition, inventiveness and innovation, the balance between work and personal life, as well as cooperation on ethical principles within the banking community.

At the end of 2025, Libra Internet Bank S.A. operated a network of 59 branches in the main development areas of Romania, combining innovative digital solutions with direct proximity to customers.

The Bank has a niche strategy, being specialised in fields such as the liberal professions, real estate and agribusiness sector. At the same time, Libra Internet Bank S.A. pays particular attention to modern technology and partnerships with fintech companies, establishing itself in recent years as the most active Romanian bank in the fintech field and one of the most dynamic banks in Romania.

The main target markets for Libra Internet Bank S.A. are:

- i. Entities in the field of liberal professions, especially in the medical field, regardless of their form of legal organization (natural persons, self-employed persons or legal entities);
- ii. Small and medium-sized enterprises, commercial companies and other types of economic entities with above-average volume of activity and financial performance (e.g. turnover > 5 MRON);
- iii. Small and medium-sized enterprises, commercial companies and other types of economic entities with a small volume of activity (e.g. turnover < 5 MRON);
- iv. Entities in the field of real estate developments;
- v. Companies with high turnover (e.g. turnover > 40 MRON);
- vi. Entities in the field of agriculture;
- vii. Economic entities operating in the field of e-commerce;
- viii. Access to foreign markets to attract resources through online channels.

Therefore, the Bank allocates resources, through standalone business lines, for the purpose of serving, the target markets with dedicated products and services, as follows:

a. **Corporate** – for small and medium-sized enterprises, commercial companies and other types of economic entities with activity volume and financial performance above average with the following subdivisions:

- Large corporate – for commercial companies with high turnover;
- Corporate – for commercial companies with medium and low turnover;
- SME (microfinance) – for commercial companies with low turnover volume (<5 million RON);
- Agribusiness – for entities in the field of agriculture.

b. **Real estate** – for real estate developers who themselves wish to initiate or to complete residential projects;

c. **Professionals** – for entities in the field of liberal professions;

d. **Retail** – for individual persons;

e. **eBusiness** – for economic entities that operate in the field of electronic commerce;

f. **Digital** – for online clients who open accounts online and operate exclusively online, including attracting deposits from abroad.

The main products and services banking put at the disposal of the clients are:

- Loans and other financing commitments;
- Operations at the clients' instruction at the counter (transfers, deposits, foreign exchange);
- Operations at the clients' instruction via internet banking (transfers, deposits, foreign exchange);
- Services for operating electronic payments;
- Issuance and acceptance of bank cards (debit and credit) and related operations (acceptance at physical and electronic merchants, acceptance at the Bank's own ATMs and those of other credit institutions);
- Online card payment processing services;
- Bancassurance services.

Thus, Libra Internet Bank S.A. serves almost 141,000 clients, both companies and natural persons:

Total clients*							
2022		2023		2024		2025	
Natural persons	Legal entities/s self-employed	Natural persons	Legal entities/self-employed	Natural persons	Legal entities/self-employed	Natural persons	Legal entities/self-employed
57,744	36,050	79,468	43,338	87,442	46,891	91,389	50,212

*clients with accounts active at the end of each year mentioned

Libra Internet Bank S.A. plays an essential role in financing the Romanian economy, focusing on the niches in which it is specialized. Among the supported fields is also the development of residential projects, where the Bank has contributed significantly to the construction of thousands of homes annually. In the last five years, the financing granted by Libra Internet Bank has supported the completion of more than 26,000 apartments, equivalent to a city able to accommodate more than 50,000 inhabitants.

Indicator	2021	2022	2023	2024	2025
Number of apartments built with financing from Libra Internet Bank S.A.	8,740	5,716	2,374	3,202	5,620

Customer satisfaction

The client represents the defining value for the organizational culture of Libra Internet Bank S.A., which is why the Bank pays the utmost attention to measuring the satisfaction of the clients and the feedback received from the clients, imposing a very short time frame for resolving complaints.

To measure customer satisfaction, the Bank carries out annual Net Promoter Score-type surveys in which several thousand respondents from among the Bank's clients take part.

Net Promoter Score is an indicator calculated on the basis of the answers to a single question: "On a scale from 1 to 10, how likely is it that you would recommend the services of Libra Internet Bank to a friend?"

A score that approaches 100 (maximum score) reflects a proportion of very satisfied customers who are most likely to mention the Bank's services favorably, frequently (promoters).

The evolution of the NPS score has continued to be at a very good level and reflects the high degree of attention that the Bank pays to its customers, as well as the suitability of the Bank's services and products to their needs.

Indicator	2021	2022	2023	2024	2025
Score	-	75	77	78	80

The survey in 2025 was carried out in the period 20-26 June, in the online environment, through the mobile banking application. Following the survey, 12,957 responses were collected from customers, the overall NPS score of Libra Internet Bank S.A. remaining at a very good level.

The Bank treats customer complaints with the utmost care, promptly investigating the reported situations and taking measures to remedy those issues and prevent negative developments. As far as possible, customers receive a reply on the next working day after the complaint is received.

Indicator	2021	2022	2023	2024	2025
Number of complaints	463	455	620	1,373	701

In 2024, the expansion of lending to individuals through the Family Start and Student Invest programs facilitated access to financing for a larger number of beneficiaries, which led to an increase in interactions with customers, including requests for clarification; however, although the total number of complaints increased, their share in the total number of requests decreased, reflecting a more efficient management of the relationship with customers, and in 2025, the absence of the Family Start and Student Invest programs, as well as the termination of the partnership with Revolut Bank, led to a decrease in the number of complaints.

Indicator	2021	2022	2023	2024	2025
Share of complaints in the total number of customers	0.46%	0.48%	0.50%	1.02%	0.50%

New technologies and innovation

Since 2011, together with the rebranding from “Libra Bank”, to “Libra Internet Bank”, the Bank has strengthened its position as a leader and innovator in digital banking, relying on a complete experience for the customer, around the online applications, on automation and speed in processing customer requests and operations and on the design of revolutionary products, acknowledged through numerous awards.

With a strong orientation towards technology, Libra Internet Bank S.A. was the first bank in Romania that launched the online account, in 2014 through which Romanians were able to open a bank account from a distance, without paperwork

After that in the year 2019 Libra Internet Bank S.A. became the first bank Romanian that exports banking technology as part of an international instant payments project (in partnership with Mastercard, Wirecard, NeoPay and Rakuten Viber), in 2020, Libra Internet Bank S.A. established itself as the first bank in Romania to launch projects of API Banking with international FinTech’s such as Revolut, Monese or Paysera, for the provision of their services on the territory of Romania. In 2021, was followed by the partnership with TransferGo, through which the users of TransferGo can make transfers instant to the holders of bank accounts in RON at the banks enrolled in the Instant Payments infrastructure in Romania but also with other international financial institutions such as Wise, Paysafe or the recent partnership concluded in 2024 together with Addiko Bank. The suite of services in the API Banking area was also extended in the course of 2024 with the API FX service, which allows foreign exchange operations to be carried out in a completely automated manner and available 24/7.

The applications of internet banking and mobile banking of the Bank have continued to be constantly improved, and the degree of use by customers has increased. Through these services, the Bank’s customers can carry out a very wide range of operations, from various transactions to data updates without having to come to the bank or to instant transfers between the cards issued by any bank in Romania.

In May 2024 the Bank introduced, for the first time for Romania, voice-based generative intelligence in the mobile banking application. Thus, the “**Libra Voice**” service allows clients to interact by voice in order to obtain information in audio and text format regarding the customer’s accounts and transactions, deposits and loans, as well as other analyses and information about the products and services in the Bank’s offering.

In October 2024, Libra Internet Bank was one of the first banks in Romania to successfully implement **the RoPay service**, developed by TRANSFOND. This instant payment system allows customers to make fast and secure transfers by scanning a QR code, without the need to enter banking details. RoPay is available free of charge to our customers and offers substantial benefits, such as processing transactions in less than 10 seconds, availability 24/7, including on weekends and public holidays, as well as reduced costs for payment processing

Additionally, starting from November 2024, the Bank offers business customers the possibility to carry out multi-currency exchanges in real time, through the Live FX platform, implemented through a partnership with Visa, one of the global leaders in digital payments. Applications for internet banking and mobile banking of the Bank remain the main channel for carrying out banking operations by the Bank’s customers, as can also be seen from the evolution of the indicator below.

Indicator	2021	2022	2023	2024	2025
Share of operations carried out through internet banking / mobile banking of total operations	57.9%	60.3%	61.79%	62.77%	61.45%

In 2025, the Bank continues to explore new technologies that allow rapid interventions and permanent adjustments of operational flows, with the objective of offering a premium experience to its customers and partners. Libra Internet Bank S.A. considers this technological context an opportunity to identify and capitalize on multiple advantages.

Process automation has remained an important priority for the Bank, aiming at streamlining activity and increasing operating speed for the benefit of customers. Efforts have focused on ensuring stability and improving existing processes through the integration of RPA, Machine Learning and Artificial Intelligence technologies.

Information Security

To ensure the protection of information, Libra Internet Bank S.A. has implemented an Information Security Management System, aligned with the international standard ISO/IEC 27001. This framework provides a structured and controlled approach for managing information security risks.

Within the Bank, policies, procedures and information security controls are implemented, aligned with the requirements of DORA (Regulation (EU) 2022/2554 on digital operational resilience) and with the principles of CIA - Confidentiality, Integrity, Availability and Authenticity, aiming to protect information, ensure continuity of activities and increase operational resilience.

Cyber threats are continuously monitored by the responsible structures, and the Bank's employees periodically benefit from information, awareness and testing programs in the field of cyber security. The Bank also carries out recurring information actions for customers, through its own website, the internet and mobile banking platforms, as well as through online communication channels, with an emphasis on preventing phishing attacks.

Protection of data of a personal nature

The processing and protection of data of a personal nature is a constant concern for Libra Internet Bank S.A., in relation to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). The Bank places emphasis on implementing the necessary measures for the protection of information through appropriate technical and organizational means, constantly adapted including on the basis of controls intended to ensure compliance with the legal framework and taking into account the best practices in the field. These efforts aim at continuous improvement in the areas of data security and the services offered to customers. At corporate level, there are internal policies and procedures that govern the processing of data of a personal nature under conditions of lawfulness, with emphasis on the way in which the confidentiality and security of all personal data are maintained.

In order to ensure compliance with legislation applicable, the Bank undertakes a series of actions:

- ensures compliance with the principle of transparency, by the publication and constant updating of a Policy on the processing and protection of personal data clear and detailed, accessible on the Bank's website to all data subjects, explaining the way in which personal data are collected, used and protected;
- ensures the training of the staff, by organizing periodic training sessions for employees, with the purpose of making them aware of the importance of data protection and of the correct procedures for managing it;
- ensures compliance with requests concerning the exercise of the rights of natural persons as regards the processing and the protection of personal data.

Risk Management

The internal control system in Libra Internet Bank SA was organized in compliance with the provisions of the Regulation of the National Bank of Romania no. 5 of 20 December 2013 on prudential requirements for credit institutions.

Internal control includes all measures adopted in the Bank for:

- keeping the Bank's assets safe and managing the risks related to banking activity;
- verifying the accuracy and reliability of accounting and management information;
- promoting operational efficiency and encouraging adherence to management policies.

In order to implement an effective and comprehensive control system for all areas of activity of the Bank, the three fundamental functions of the internal control system are organized:

- the risk management function, performed by the Risk Management Division. This function also includes the risk control function as part of the risk management function;
- the compliance function, performed by the Compliance Division;
- the internal audit function, performed by the Internal Audit Division.

Internal control represents the mechanism used on an ongoing basis for checking the activity of the Bank, both at central level, and also at the level of the departments/divisions/branches, based on procedures for work and for control applied at the level of each structure.

The functions of the internal control system are independent of one another from an organizational point of view and from the operational and support functions that they monitor and control.

The internal control system of the Bank comprises:

- the role and responsibilities of the management body regarding internal control;
- the identification and assessment of significant risks;
- control activities and the segregation of responsibilities;
- information and communication;
- monitoring activities and the remediation of deficiencies.

The internal control system is regulated by policies, rules and internal control procedures, general and pertaining to each function of internal control. The activities of control are defined for each level of organization of the Bank and involve:

- a) the establishment of control policies and procedures;
- b) verification of compliance with the established policies and procedures.

Significant risks, in the understanding of Libra Internet Bank, are risks with a significant impact on the position financial and/or reputational of the institution of credit. The assessment of risks constitutes an integral part of the Internal Process for the Assessment of Capital Adequacy to Risks. Through this process, all risks are identified to which is exposed the bank and the activities of management of these. The purpose of the assessment of risks is to identify the level of significance and the effects of the risks assumed by the Bank.

For risks considered significant, key risk indicators have been defined and strategies and measures have been drawn up tailored for each risk in part. Annually or at the time of the occurrence of significant changes in the business or regulatory environment, the Bank may resume the risk assessment process.

In its activity, the Bank carries out management processes for the following significant risks significant:

- Credit risk, with the risks associated with it: concentration risk, residual risk (from the use of credit risk mitigation techniques), risks generated by lending in foreign currency to borrowers exposed to foreign exchange risk, underestimation of credit risk in the context of using the standardised approach;
- Operational risk, with the risks associated with it: legal risk, IT&C risk, model risk and outsourcing risk;

- Market risk, having the following components: foreign exchange risk, interest rate risk outside the trading book (IRRBB);
- Liquidity risk (general liquidity risk, withdrawal risk, funding risk);
- Compliance risk;
- Fraud risk;
- Risk associated with the excessive use of leverage;
- Reputational risk;
- Conduct risk;
- Strategic risk (including the risk of conducting the business).

The risk of credit and the risks associated represent the risk current or future of a negative impact on profits and capital, as a result of the failure by the debtor to fulfil contractual obligations or of the failure of the debtor in meeting those set by the nature and complexity of the activity Libra Internet Bank S.A., credit risk represents the risk with the most significant impact on the Bank's financial position.

For the determination and assessment of exposures that may generate credit risk, the responsible departments prepare a detailed analysis of the counterparty, an analysis which takes into account:

- the type of credit facility requested;
- the creditworthiness of the company requesting the loan (qualitative and quantitative factors which score the counterparty's financial soundness);
- the company's repayment capacity, including the way in which it is exposed to foreign exchange risk by contracting loans in foreign currency;
- the company's history (the way in which the client has so far honoured its banking obligations, commercial obligations and debts to the state);
- the geographical area, the industry and the quality of the market in which the company operates;
- the experience and reputation of the company and its management;
- the level of collateral coverage, the type and liquidity thereof, as well as the Bank's history as regards the recovery of each type of collateral.

Following this analysis, the bodies competent to approve loans decide on the approval or rejection of the facility depending on the factors listed above.

Periodically, through specific reports, the Risk Management Division identifies the sources of materialization of credit risk and associated risks at the level of the Bank's portfolio, on the basis of various credit risk indicators and of a system of warning thresholds that allows the identification/monitoring of concentrations of credit risk in certain geographical areas, by product types, by client types, sales lines, types of collateral, type of analysis, in various currencies, etc.

Also, within the Bank periodic analyses of loans in progress are carried out by applying qualitative and quantitative indicators, in order to identify and manage the portfolio with credit risk, to clearly define the situations that lead to debtors being considered unlikely to pay and to set up adequate loss allowances.

Operational risk is the risk of loss resulting either from the use of inadequate internal processes, people or systems or from those that have not performed their function properly, or from external events. Fraud risk is dealt with under the procedure on the prevention, detection, investigation and deterrence of cases of fraud (the Anti-Fraud Procedure). Following the creation of the database of events generated by operational risk, an analysis is carried out of the losses due to this type of risk, classified into the following categories:

- internal fraud & external fraud;
- employment practices and workplace safety;
- clients, products and business practices;
- damage to tangible assets;
- interruption of activity and inadequate functioning of systems;
- the execution, delivery and management of processes.

The components of operational risk are:

- the management of risks associated with outsourced activities;
- risk related to IT technology – risks from IT and information security represent potential situations that may alter an asset's properties in terms of confidentiality, integrity and availability;
- legal (juridical) risk – risk of loss as a result both of the fines, penalties and sanctions to which the credit institution is liable in case of non-application or faulty application of legal or contractual provisions, and of the fact that the contractual rights and obligations of the credit institution and/or of its counterparty are not properly established;
- model risk – the possible loss that a credit institution could incur as a result of decisions that might be based mainly on the results of internal models, due to errors in the development, implementation or use of these models. Model risk may generate financial losses, an inappropriate process of making decisions business/strategic or may affect reputational risk.

Operational risk is managed actively by all entities within the Bank, on the basis of the framework for managing, drawn up by the Risk Management Division. The committees responsible for managing operational risk that receive reports regarding operational risk are the Security Committee (quarterly), the Management Committee (monthly) and the Risk Management Committee /Board of Directors (quarterly).

Market risk is the risk of incurring losses related to on-balance-sheet and off-balance-sheet positions, due to unfavourable market fluctuations in prices (for example: share prices, interest rates, foreign exchange rates etc.).

From the perspective of market risk in relation to the portfolio of the Bank, the following risks arise:

- foreign exchange risk;
- interest rate risk outside the trading book.

Foreign exchange risk – The main objective of the Bank in the field of market risk management is the minimization of potential losses that could be generated by adverse movements in exchange rates or interest rates, while offering a certain range of basic products and services to clients:

- spot foreign exchange transactions, forward transactions on exchange rates and foreign exchange SWAPs;
- transactions with government securities and other debt securities tradable OTC and for which there is a liquid market.

The generation of income from proprietary trading activities directly on the interbank market or on other organized markets does not represent a strategic direction for the development of the Bank's activity. Such activities are incidental and occasional in nature or may be carried out to the extent that trading activities arise from the need to ensure the provision of banking products and services to the Bank's own clients. In the area of market risk, the Bank assumes foreign exchange risk. The Bank does not carry out transactions with financial instruments that entail a price risk included in the trading portfolio, therefore, in this respect, the Bank does not assume any price risk.

Interest rate risk from activities outside the trading portfolio represents the current or future risk of a negative impact on profits and capital as a result of adverse changes in interest rates. The Bank does not strategically pursue the generation of income from the trading of instruments that are sensitive to interest rate developments (for example: trading securities) and, in this respect, the presence in the Bank's portfolio of such instruments will be incidental. The Bank does not use complex financial instruments, which is why its exposure to interest rate risk arises mainly from differences in maturities / repricing periods of its assets

The raising and placement of resources from/to non-bank customers constitutes the predominant activity within the operations carried out by Libra Internet Bank S.A..

The Bank determines the change in its economic value in relation to the variation in interest rates, using the standard methodology presented in the annex to BNR Regulation No. 5/2013 on prudential requirements for credit institutions. Thus, the interest differences received as a result of applying the interest rate differential to assets and liabilities that are sensitive to interest rate changes, allocated to maturity bands, are reassessed.

Liquidity risk is the risk current or future of negative impact on profits and capital, determined by the inability of the institution of credit to fulfil its obligations at the maturity thereof. The risk of liquidity is managed actively by the Division Treasury and the Division Management of Risks. The committees for managing the risk of liquidity are ALCO (at least monthly), the Committee of Management (at least monthly) and the Committee for Audit and Risk (at least quarterly).

The Bank has established scenarios of "stress testing", in order to monitor the capacity of the Bank to be able to cope with various situations unforeseen. These scenarios, the imposed limits and the reporting lines are established by the procedures regarding the management of unforeseen situations and by the strategy in the field of liquidity management.

The objective main of Libra Internet Bank S.A. in the field of the management of liquidity is made up of the adoption and the maintenance of an optimal structure of the Bank's assets and liabilities, a structure that allows:

- maximization of the net interest income recorded by the Bank at a given level of assets;
- correlation of interest rates with market developments and their adjustment according to the Bank's liquidity needs;
- carrying out the Bank's activity under optimal conditions, while avoiding as far as possible dysfunctions that could arise due to assuming excessively high risks in the field of liquidity;
- minimization of the effects negative that could possibly occur in the event of the occurrence of a situation of crisis from the perspective of the Bank's liquidity.

Compliance risk is the current or future risk of affecting profits and capital, which may lead to fines, damages and/or termination of contracts or which may affect the Bank's reputation, as a result of breaches or non-compliance with the legal and regulatory framework, with agreements, recommended practices or ethical standards.

Compliance risk is identified, assessed and monitored in accordance with the rules and procedures of the Compliance Division and within the risk assessment process.

The risk associated with the excessive use of leverage represents the risk arising from the institution's vulnerability to leverage or to contingent leverage that may require unplanned measures to correct the plan or the business, including the emergency sale of assets, which could lead to losses or to revaluations of the remaining assets. Leverage represents the relative size of the assets of an institution, of off-balance-sheet liabilities and liabilities contingent to make payments, to provide a performance or to offer real guarantees, including the obligations arising from financing received, commitments undertaken, derivative financial instruments or repo agreements, except for obligations that can be enforced only during the liquidation of an institution, in relation to the own funds of the respective institution.

The business model of Libra Internet Bank S.A. does not make the use of excessive leverage necessary, since the financial instruments traded by the Bank do not involve credit risk mitigation techniques other than collateral deposits and bank guarantee letters.

For the monitoring of the risk associated with the excessive use of leverage, the aim is to remain within the risk profile. The various dimensions and targets that the Bank uses to define the risk appetite, as part of the risk strategy for the risk associated with the excessive use of leverage, are detailed in the Risk Management Strategy.

Reputational risk represents the current or future risk of a negative impact on profits and capital determined by an unfavourable perception of the image of a credit institution by customers, the media, counterparties, shareholders, investors or supervisory authorities. In assessing reputational risk, the Bank takes into account:

- negative publicity, whether or not in line with reality, relating to business practices and/or persons connected to them;
- customers encountering problems in using certain products, without having sufficient information about them and without knowing the procedures for remedying those problems (for example: not knowing the rights and obligations of the parties to an electronic banking transaction).

Management of reputational risk is a permanent process, integrated into the sustainable development of the Bank's business. All employees of the Bank must be aware of the importance of this risk. In the collection of data and information relating to reputational risk, the Marketing Division plays an important role.

Strategic risk (including business risk) represents the current or future risk of a negative impact on profits and capital, determined by changes in the business environment or by unfavourable business decisions, by inadequate implementation of decisions or by the lack of response to changes in the business environment. The identification, assessment and monitoring of strategic risk is carried out by the Risk Management Division, from the perspective of compliance with the limits of risk set in within the Risk Management Strategy for risks and through the manner in which the strategic objectives of the Bank are fulfilled from the point of view of risk-taking.

Continuous training of employees

The Bank has maintained its essential role in the professional development of employees, encouraging participation in at least one training program during the year. Professional objectives are also discussed and assessed annually, based on clear and measurable performance indicators (KPI).

During 2025, various training programs for employees were carried out, both internal — delivered by trainers from within the organization — and external, in partnership with specialized providers. Depending on the specificity of the activity/topic, the courses were delivered online or in person.

Under the umbrella of #InvestInYourself and in the context of the permanent need for development in a constantly changing field, the Bank organized during 2025 a number of 13 masterclass-type sessions, delivered online. The sessions recorded an average participation of approximately 195 employees each and addressed topics relevant to the development of competences both at operational and at managerial level. Among the most appreciated topics were “Think Big – how to develop strategic thinking”, “Complex problems, creative solutions” and “Building long-term resilience”.

In addition to these initiatives, under the umbrella of the internal program “AI&I – Ready for the future”, dedicated to the responsible, safe and efficient use of artificial intelligence, two asynchronous courses were launched on the Libra Internet Bank LMS e-learning platform: the introductory course on Artificial Intelligence (AI), addressed to all employees, and Generative AI for Executives and Business Leaders, intended for managers. Both courses recorded a participation rate of 100%. In addition, 6 online sessions were organized with external providers, focused on the use of the Microsoft Copilot tool, at which approximately 380 participations were recorded.

To support the development of managerial competencies, the Bank continued the implementation of the Next Level Academy program, dedicated to Division Directors and Branch Directors, with approximately 60 unique participants, in 2025. The program has a multi-module structure and is carried out in collaboration with an external partner, over a period of three years (2024–2026).

At the same time, for department heads three in-person sessions of Effective Team Communication were organized, delivered with an external provider and based on the Process Communication Model (PCM) methodology – a model internationally recognized for understanding communication styles, sources of stress and individual motivations. The three sessions brought together 44 unique participants.

In preparation for the launch of the Libra Spotlight program, implemented in May and designed to give each division the opportunity to present monthly, primarily through the voice of the director, its activity, contributions and impact within the organization, an intensive Public Speaking training was also organized. The session, held in physical format and delivered with an external provider, targeted an initial group of 16 participants directly involved in the project.

The organization of trainings dedicated to colleagues in the sales area was continued, grouping participants according to their level of seniority, taking into account the recommendations of the directors and the specifics of each business division. The sessions were organized in physical format, in the classroom, with an external provider, under the name “Hunter’s Camp”, bringing together 85 unique participants. The aim: developing sales and cold calling skills in the B2B environment.

The synchronous learning sessions organized by the Bank included both delivery carried out with internal resources and the contribution of external providers. For the team of internal trainers, a Train the Trainers course was organized, delivered by an external provider and held in two series (one in physical format, in the classroom, and the other online), with 12 unique participants. In specific situations, employee training was supplemented by participation in courses offered by various external providers — such as Institutul Bancar Român — in addition to those initially planned by the Bank.

The continuous training of employees is supported by asynchronous materials, available on the internal e-learning platform, Libra Internet Bank LMS. In 2025, employees were able to go through in the LMS the training materials corresponding to the mandatory courses in areas such as Compliance, Operational Risk, IT Security, AML/CFT/International Sanctions, Operations, Business Continuity Plan, Anti-fraud and Consumer legislation (GEO 52/2016). These were supplemented by courses on Processing personal data (for the Management Board), Credit analysis, Creatio – Leads, Bank resolution, The path of a project – from idea to implementation, Information security (Management Board) and Responsible use of AI.

In 2025, the Libra Internet Bank LMS platform was enriched with a new series of tutorials and training materials dedicated to SCRUM teams. The development of the learning pillar intended for colleagues from the operational area also continued, as well as the expansion of the portfolio of courses for branches and of soft skills courses. The courses published on the internal learning platform are interactive, combining video materials, written content and applied testing. A perfect example in this respect is the LibrAGORA concept, launched in 2025, as an out-of-the-box format in the form of a tête-à-tête, with a friendly and conversational tone, recorded and posted on the e-learning platform. Learning takes place by following a Q&A-type dialogue, with questions relevant to the audience and concrete examples in the answers. In 2025, 2 LibrAGORA episodes were launched, with topics concerning banking products of the bank. The episodes enjoyed very good feedback which led to the decision to continue the series also in 2026. The LMS platform is in continuous development and will be supplemented with new learning resources over time.

Indicators	2021	2022	2023	2024	2025
Total hours of professional training	19,189	22,547	21,438	23,210	29,510
Employees included in the annual evaluation	709	743	804	963	1,176

Employer responsible and transparent

Starting with the year 2022, Libra Internet Bank S.A. established a new standard of salary transparency, becoming the first employer in the domestic banking sector that publishes gross salary ranges in recruitment announcements.

Libra Internet Bank S.A. pays increased attention to creating a work environment conducive to professional development and personal, in a climate comfortable, which fosters collaboration and encourages creativity and the implementation of new ideas. At the same time, Libra Internet Bank S.A. places emphasis on the development professional of employees, with more than 60% of the managerial positions in the Bank being filled by persons promoted from within.

Communication with employees

In addition to the attention given each time to customer satisfaction, the Bank also places emphasis on the satisfaction of its own employees, through concrete, periodic actions of communication and feedback collection.

In the year 2024, the internal communication and engagement platform Libra People was implemented, a strategic tool for strengthening the relationship with employees. The platform creates a virtual space dedicated to internal communication, promoting transparency and the active involvement of employees through interactions that contribute to the development of an open and dynamic organizational culture. In addition, through the platform, can be conducted quick surveys periodically that allow real-time monitoring of employees' perceptions and concerns regarding certain topics.

Within the platform, there were developed over the course of the year 2025 specific communities, such as the one dedicated to reading enthusiasts or to those involved in the mentoring program Libra Mentoring, or to colleagues who have the role of Buddy in the process of integrating new employees into the organization. All with the role of enhancing the sense of belonging and the level of engagement of colleagues. In addition, the platform has been enriched with an area specially dedicated to news, Libra News, so that employees have permanent access to news with an impact within the organization.

Furthermore, with the implementation of the onboarding program for new employees, the process of activation and collection of feedback has been optimized, thus ensuring close monitoring of its evolution from the very beginning of the professional journey. These complementary initiatives facilitate the rapid identification of the real needs of employees and contribute to continuous and efficient organizational adaptation.

In addition, with the aim of improving transparency regarding the activity in different areas of the organization and of facilitating dialogue between the organization and employees, starting from 2025 there was developed Libra Spotlight, a live, monthly event in which, on a rotating basis, representatives of the divisions in HO discuss openly about the activity within the division in which they operate and at the same time build a bridge of communication with the rest of the organization.

Programs for employees

In a traditional manner, the Bank organizes programs for employees, through which encourage the spirit of team and promote a healthy lifestyle. In the year 2025, the main programs for employees were:

- **"Libra Energize"** is a traditional internal competition in which the Bank's employees, organized in teams, compete in various sports events such as road or mountain running, cycling, swimming, climbing, kayaking, crossfit, archery, karting, mountain orienteering etc. In 2025, there took place the thirteenth edition of the program, bringing together 78 employees, grouped into 14 teams.
- **"Libra Cultural"** is a program dedicated employees passionate about art, in all its forms. The edition from 2025 has combined technology with art, having as objective learning through creative experimentation. Under the concept "Libra Cultural. You are the artist", employees have developed skill-sets through art and technology, becoming even themselves creators. Over the course of 4 sessions, over 100 participants have worked together with artists contemporary specialized in art generative, AI Art, mural and drawing in charcoal. The experience gave them the opportunity to explore the principles of collaboration, innovation and creativity, guided by artists renowned from Romania and from abroad.
- **"Libra Blitz Talk"** is a monthly video-podcast internal, launched back in 2021, which has become a space dedicated to the inspirational stories of the people from Libra. With a relaxed format, but with relevant topics, Blitz Talk functions at present both as an instrument for strengthening the culture of the organization, as well as a mechanism for motivating and of recognition of the performances of the guests and of the teams from which they come. Employees have the opportunity to -their discover colleagues in a different role , that of guests in an informal podcast, but with discussions that are substantial, held under the slogan "It's not small talk, it's Blitz Talk!". The editions are available on the Bank's internal communication platform, being published monthly (sometimes two per month) and announced throughout the entire organization. In 2025, 15 Blitz Talk editions were produced, with an average of almost 600 unique views per episode.

- **"Libra Mentoring"** is a mentoring program dedicated to the development of leadership skills. The 3,0 editions, carried out over a period of 12 months (starting in July 2025), is developed and implemented in accordance with EMCC – European Mentoring & Coaching Council criteria. The new edition started with 29 mentees, selected on the basis of clearly defined criteria, and 15 mentors who enrolled voluntarily, all with managerial roles and solid professional experience. The program includes training sessions, development missions built internally & oriented toward strengthening leadership competences, as well as monthly mentor–mentee meetings. Since 2024, "Libra Mentoring" has held ISCMP Silver accreditation granted by European Mentoring and Coaching Council Global, being the first program of this kind accredited in Romania according to EMCC standards.
- **"Share your Hobby"** is an internal program launched in 2023, through which the Bank's employees have the opportunity to share their passions in practical sessions held physically at the Bank's headquarters. In 2025, 16 workshops were organized, in which more than 200 employees participated. Participants explored varied hobbies, from creative activities — such as making kokedama, painting, creating pictures from lichens or building their own terrarium — to areas of artistic expression, such as theatre and improvisation techniques. The program also included activities oriented toward well-being and personal development, such as meditation sessions, as well as practical workshops with educational themes, such as financial education or the Italian language. The diversity of the workshops supported authentic connection between colleagues and the strengthening of the internal community.
- **"Libra Harmony"** is a concept continued also in 2025, focusing on the well-being of colleagues from Libra. Under the slogan "Balancing health & happiness", the program included actions both on-site and online, with the objective of promoting a solid balance between professional and personal life. Over the course of the year, 10 masterclasses were organized, which addressed essential topics for physical, emotional, and social health. Among these were sessions dedicated to managing stress and its impact on health, understanding the mechanisms of burnout, as well as stress detox techniques. Topics focused on sleep quality, emotional intelligence, strategies for managing emotional eating, as well as sessions regarding social anxiety or the importance of direct interpersonal connections were also included. In total, these activities generated more than 1700 participations, consolidating the Bank's commitment to a balanced and healthy working environment.
- **"Libra Spotlight"**, launched in May 2025, is a new program, created to strengthen interconnection between divisions and to provide a clearer perspective on how the contributions of each department come together in the optimal functioning of the bank. The program brings monthly to the-foreground a division, which presents its activity and its impact in the framework of live online sessions open to all colleagues. The format facilitates direct dialogue, increases transparency and supports a better mutual understanding between teams. In 2025, 8 sessions were organized, with an average of over 300 participants per edition and with very good feedback (level of recommendation 9.6/10). The sessions are recorded and subsequently available on the internal e-learning platform, which extends access and the visibility of information. The results have confirmed the relevance and added value of the program, which continues in 2026.

Ethics, conduct professional and combating corruption

Libra Internet Bank S.A. seeks to conduct its activities in an environment governed by principles sound. The fundamental principles of banking ethics, applicable to all employees of the Bank are: moral integrity, impartiality and non-discrimination, professionalism and transparency, compliance with the provisions of the legislation in force, confidentiality, prevention and combating acts of corruption, the exercise by the Bank's employees of prudent activity, social responsibility, avoidance of denigration, loyalty and honesty.

The principles promoted by the Bank are regulated in the Code of Ethics, an internal regulation which is subject to annual review and communicated to all employees. The Code of Ethics establishes the responsibilities that the Bank and the employees have towards each other, towards business partners and towards society. It helps in understanding the responsibilities shared and draws attention to issues legal and of ethics that may arise. At the same time, it includes a section dedicated to anti-bribery and anti-corruption, with regard to which the Bank applies zero tolerance and seeks to combat in a manner proactive of any acts or attempts of bribery and corruption, a breach of these principles constituting a disciplinary offence punishable in accordance with the internal regulations and the legislation in force. In addition, has been established at the level of the bank an independent channel dedicated to reporting any breaches of legislation identified by the Bank's employees and its suppliers, such reports may also be recorded anonymously. The responsible person is required to make all efforts to examine the information received, in order to determine a way of resolution, and the whistleblower has all the rights and prerogatives established by law.

Additionally, every employee of the bank must pass a test annually, after attending the internal courses on ethics and professional conduct.

Conflict of interest

Libra Internet Bank S.A. has implemented policies which are aimed at establishing appropriate mechanisms for the identification, assessment, management, reduction and prevention of conflicts of interest, actual or potential, for employees and the management body.

A conflict of interest may arise in the situation in which the interest personal direct or indirect of the Bank's staff or of the bodies of management is contrary to the Bank's interest, thus so that it affects or could affect their independence and impartiality in making decisions or in the timely and objective fulfilment of the duties that fall to them in the exercise of their responsibilities of office, and it may arise in a multitude of circumstances (e.g. market abuse, business relationships with the Bank's clients, transactions). Thus, employees have the obligation to report any situation that could fall within a conflict of interest as understood in the internal policies.

At the same time, the Bank constantly monitors all situations reported or identified by the responsible function, applying measures in the event that it is found violations of the internal policies, of a nature to form the object of conflicts of interest.

Know Your Customer, the prevention of money laundering and terrorist financing and compliance with sanctions regimes

Libra Internet Bank S.A. attaches particular importance to the identification and knowledge of its clientele, this activity being considered critical with regard to the Bank's ability to comply with the specific legislative framework, including in the monitoring subsequent of the activity of the clients. Thus, there have been developed procedures for work and operational flows that allow both (i) the collection of relevant information at the opening of the account, as well (ii) a monitoring adapted to the profile operational of the clients.

The process of obtaining and storing data regarding customer due diligence complies with the principles of security and data minimization. In order to carry out effectively the customer due diligence activities and to prevent offences of laundering of money and of financing of terrorism, the Bank adopts a approach on a risk basis. Thus, the mechanism for customer due diligence, for monitoring and reporting of the activity of the customers on account is based on a continuous assessment of the risks AML/CFT and of the risks of non-compliance with the sanctions regimes to which the Bank is subject, and the allocation appropriate of resources with a view to reducing these risks.

Libra Internet Bank S.A. ensures both initial training upon employment and, subsequently, on a continuous basis, for the staff with responsibilities in the field of customer due diligence for the purpose of preventing money laundering and terrorist financing. The training material is constantly updated so as to ensure an appropriate level of knowledge theoretical and practical, including as far as concerns the challenges generated by legislative, technological developments or geopolitical realities.

Libra Internet Bank S.A. does not initiate, does not continue a business relationship and does not perform an occasional transaction if it cannot apply customer due diligence measures, including in cases where it cannot establish the legitimacy of the purpose and nature of the business relationship or cannot adequately manage the risk of money laundering and the financing of terrorism.

The application of sanctions international and of restrictive measures represents a element fundamental in the programme Libra Internet Bank S.A. for preventing money laundering and the financing of terrorism. Libra Internet Bank S.A. applies the sanctions regimes promulgated by the European Union ("EU"), the United Nations, in accordance with Government Emergency Ordinance no. 202/2002 and, in the particular case, the sanctions regimes of the United States ("USA") Department of the Treasury Office of Foreign Assets Control ("OFAC") with regard to Iran, North Korea and Cuba.

Human Rights

Through the regulations internal existing at the level Libra Internet Bank S.A. are taken all measures for the observance of human rights, any direct or indirect discrimination against colleagues at the workplace, clients or potential employees of the Bank, on the grounds of sex, sexual orientation, genetic characteristics, age, affiliation national, race, colour, ethnicity, religion, political opinion, origin social, pregnancy, disability, trade union affiliation or activity, or any other reason for unlawful discrimination. The Bank applies equal, non-differentiated and impartial treatment to all persons with whom its employees interact. In the processes of recruitment carried out at the level of the Bank all candidates benefit from equal employment opportunity and employees are provided with an environment for carrying out their activity under appropriate working conditions, of social protection, of safety and health at work, as well of respect for dignity without any discrimination.

The Bank prohibits any type of behaviour - verbal, physical or visual - that can be interpreted as harassment, sexual harassment, psychological harassment, moral harassment at the workplace or that is degrading or offensive towards another employee or person, including clients of the Bank, on grounds of race, nationality, ethnicity, language, religion, social category, beliefs, gender, sexual orientation, belonging to a disadvantaged category, age, disability, refugee or asylum-seeker status, or any other criterion that leads to the creation of an intimidating, hostile, degrading or offensive environment.

In the annual process of professional training, the employees of the Bank go through mandatory training materials that cover topics relating to the observance of human rights. Thus, over the course of the year 2025, attendance at the specific training programmes, as well as the pass rate in the related tests, was approximately 100%.

Social inclusion

Libra Internet Bank S.A. provides a safe environment for all its employees and through its recruitment and staff selection procedures, as well as those for rewarding performance and promotion, states and applies a non-discrimination policy. Thus, the Bank encourages all candidates or employees, regardless of gender, race, sexual orientation, national affiliation, ethnicity, religion, political options, social origin, etc. to be part of the organization, ensuring them equally the same opportunities to be selected, to prepare for professional development and to advance in their career within the Bank.

The share of women among the Bank's employees continues to stand out (66.16 %), similar to that in the year 2024, given that the number of the Bank's employees at the end of the year 2025 was by approximately 5.7% higher than in the previous year.

Furthermore, Libra Internet Bank S.A. pays increased attention to identifying and attracting talents as early as the years of study or immediately after graduation, offering internship positions and the possibility of enrolment in the Banking Academy - a programme aimed at young people who wish to learn various areas of banking (e.g., sales, financial analysis, etc.), with 2 sessions organized in 2025. The programme is organized together with the trainers internal to Libra Internet Bank S.A., being addressed to young graduates of higher education who later, after going through all the necessary stages, have the opportunity to remain in the organization in various areas of activity. The sessions in 2025 were aimed at training future Relationship Managers within the organization, as well as at training future credit analysts. For the implementation of the Banking Academy a specific curriculum was built, for 1 month, in the case of colleagues from the sales area, and 3-6 months for those from the financial analysis area, during which the participants went through both theoretical modules and practical modules.

Indicator	2021	2022	2023	2024	2025
Turnover rate	19.1%	25.4%	17.41%	14.04%	13.55%
Number of employees	981	1035	1110	1307	1386
Of which women	669	710	749	876	917
Percentage of women in managerial positions	54.4%	46.9%	47.68%	51.55%	53.50%
Number of interns (internship) & the Program Golden League (from 2023)	4	3	3	-	-
Number of participants in the Banking Academy	41	25	48	22	272

Impact in the community & Social responsibility

Libra Internet Bank S.A. is an organization that always acts responsibly towards the community, with an impact positive on the development of society as a whole. In this context, Libra is an important buyer of goods and services, with purchases made almost entirely from local suppliers, a fact that contributes to supporting the development of the Romanian economy.

Indicator	2021	2022	2023	2024	2025
Percentage of purchases from local suppliers in the total	96%	95%	94%	94%	92%

Social responsibility

Libra Internet Bank S.A. supports the adoption of an active lifestyle also among the communities, not only of the employees. Thus, Libra Internet Bank S.A. was the official partner of the Braşov Half Marathon, a mountain running race organized in the month of April, at which around 1200 runners participated. As part of the competition, stage 1 of the Libra Energize program (13th edition), approximately 100 of the Bank's employees took part in the 2 types of races within the event held in Braşov. In addition to this official competition at which the bank was a sponsor, Libra employees took part in 2025 in other sports competitions, such as: mountain running, road running, swimming, mountain biking and others.

Awards

Over time, professional communities and media institutions have consistently recognized the efforts and results of Libra Internet Bank, which have stood out through innovation, perseverance, courage and a strong focus on customer needs, thus consolidating an important place in the banking system in Romania.

In 2025 the activity of Libra Internet Bank was widely appreciated, and its performances and initiatives were validated through significant awards, such as:

- Corporate Product of the Year for the loan InvestEU Financial Leaders Gala, 2025);
- A new award for "Libra Voice", the first generative AI service included in a mobile banking application in Romania (Gala eBusiness, 2025);
- The INDEPENDENȚA Trophy for the progress over the last 20 years (Banking News Anniversary Gala, 2025) ;
- Awards for the services of Internet and Mobile Banking (Online Banking Gala, 2025).

5. Subsequent events after the date of 31.12.2025

On 6 April 2026, the Competition Council sent Libra Internet Bank S.A. the investigation report regarding the ROBOR fixing procedure, this representing a stage preceding the authority's final decision. The Bank considers that its activity has fully complied with the applicable legal framework and will go through all procedural steps available to demonstrate this, the outcome of the process remaining uncertain at the date of the financial statements.

6. Strategic directions of LIBRA INTERNET BANK in the period 2026-2028

In the period 2026-2028, the Bank will continue the strategic directions previously established, pursuing a balanced development in all business areas.

- **Optimization of the Lending Process:** Implementation of digital solutions to improve operational efficiency and customer experience, ensuring a faster and more efficient lending process.
- **Digitalization and Technological Innovation:** Continuing the use of advanced technologies, such as artificial intelligence, to improve customer experience, operational efficiency and reduce operating costs;
- **Focus on Traditional Segments:** Paying increased attention to traditional segments, such as liberal professions, agriculture, real estate and retail, where the bank has solid experience and is less exposed to technological risks.
- **Strengthening the Position through Organic Growth and Partnerships:** Strengthening the bank's position through organic growth and assessing opportunities for new partnerships to complement the product and service offering.
- **Strengthening the Teams:** Continuing efforts to attract talent in technical areas, aiming to strengthen IT and Quality Management teams, as well as support teams. The professional and personal development of employees is essential to maintaining a high level of performance.
- **Maintaining Liquidity and Capitalization:** Ensuring an adequate level of liquidity and capitalization to cover significant risks, including MREL requirements, and maintaining solvency and the MREL ratio above the requirements imposed by NBR.
- **Organizational Culture:** Maintaining an organizational culture based on collaboration, diversification and continuous adaptation, through professional and personal development programmes for employees.

7. Evolution of the economy

7.1 Domestic context

Gross Domestic Product

Romania's economy is going through a period of recalibration, marked by notable resilience but also by structural imbalances that continue to require special attention. As regards economic growth, Romania managed to avoid recession in 2025 (+0.7%), maintaining a positive pace sustained to a large extent by public investments, especially those financed through European funds. Although household consumption was tempered by the high cost of living, infrastructure projects remain the main driving engine, providing stability in a difficult regional context.

Inflation and interest rates

Inflation was increasing in 2025, with the level at the end of the year being 9.7%. It was significantly fuelled by higher energy prices, increased excise duties and adjustments of value-added tax rates. Although wage pressures had until recently been a major risk factor, the dynamics of incomes decreased significantly in the second part of 2025, when the real annual change in wages entered negative territory, and purchasing power began to undergo a visible erosion process. In this context, the National Bank of Romania maintained a prudent monetary policy (key interest rate 6.5% at the end of 2025). The 3-month ROBOR index, which saw episodes of volatility and increases to above 7% in the first part of 2025 amid uncertainties, managed to return to a downward path in the second half of the year. This decrease was possible as market liquidity improved, the level of the 3-month ROBOR at the end of the year falling to 6.1%.

The budget deficit

The most sensitive issue of the macroeconomic picture remains fiscal consolidation. Romania is under the excessive deficit procedure, which has obliged the government to adopt packages of fiscal measures to reduce the deficit. Besides the increase in value-added tax, the rise in excise duties, the elimination of certain tax facilities and the taxation of higher pensions, the collection of budget revenues was improved by transforming the e-Factura and e-Transport systems into rigorous control instruments through interconnection of databases and strict monitoring of goods flows. All this, together with increased discipline of public expenditure, gave the budget deficit a downward trajectory beyond expectations in 2025, bringing it below 8% of gross domestic product (9.3% of GDP in 2024). The balancing of the budget between the need for investments and fiscal rigour remains a long-term process.

The trade balance

The high trade deficit, driven by the fact that Romania continues to import more than it exports, puts constant pressure on the balance of payments. Although foreign capital inflows and European funds partially cover this gap, dependence on external financing makes the economy sensitive to changes in global sentiment. The data as at December 2025 confirmed the downward trend of the trade deficit in Romania, as shown by the trend of the data series, the improvement of the trade deficit being generated however by the favourable dynamics of exports, and not necessarily by a tempering of imports.

7.2 The year 2026

At the international level, the year 2026 could be rather a test of institutional resilience, in which success will depend on the governments' capacity to manage the high public debts and to turn technological innovation into an engine of sustainable growth, against the background of substantial upward pressure on energy costs and of disruptions that may occur in global supply chains. Recent forecasts of the major financial institutions (the International Monetary Fund and the World Bank), indicate global growth in the range 2.6% – 3.3% with a slight tendency toward moderation compared with the level of 3.2% in 2025. These will be, probably, revised downward over the coming period as a result of the outbreak of the conflict with Iran, which has led to a significant increase in oil and natural gas prices.

The year 2026 is shaping up to be one of utmost importance for Romania's economic trajectory, as it represents the final milestone for the implementation of the projects under the PNRR and, at the same time, an important point in the process of fiscal adjustment. The macroeconomic context will be marked by an obvious duality: on the one hand, the prospect of an increasing inflow of European funds, and on the other hand, the implementation of internal reforms to support competitiveness.

The advance of the Romanian economy in 2026 will be conditioned by a strong increase in the absorption of European funds (EUR 15-16 billion) that will accelerate the investment process to a level capable of counteracting the weakness of household consumption. Major projects in the area of transport infrastructure, health & education, energy & digitalization, environment, SMEs & social represent the supporting pillars of gross domestic product. A weaker absorption, of approximately 70% of the target, could be equivalent to keeping the economy just afloat.

The inflation outlook will be affected in 2026 by the outbreak of the conflict with Iran, which in only one month (March) pushed up the spot price of Brent crude oil by almost 40%. The uncertainty is currently heightened also by the fact that, for the time being, it is not yet possible to foresee when hostilities in the Middle East region will come to an end. The upward pressure on inflation generated by fuel costs could diminish drastically the chances of reducing the monetary policy interest rate this year. The RON-EUR exchange rate could remain an anchor of stability in 2026, in the context of the preservation of political stability.

8. Proposals of the Board of Directors to the General Meeting of Shareholders

1. The Board of Directors proposes to the General Meeting of Shareholders of 28/29 April 2026 to distribute the profit for the year 2025 as follows:
 - i. 5% of the gross profit, amount of **18,993,126 RON** to be allocated to the legal reserve;
 - ii. Amount of **305,054,996 RON** to remain in retained earnings as undistributed profit.
2. In accordance with the Order of the National Bank of Romania no. 27/Dec 2010 (republished) approving the accounting regulations compliant with the International Financial Reporting Standards, as subsequently amended and supplemented, the Board of Directors proposes to the General Meeting of Shareholders the approval of the following documents:
 - i. The financial statements for the year 2025 prepared in accordance with the Order of the National Bank of Romania no. 27/Dec 2010 (republished) for the approval of the accounting regulations compliant with the International Financial Reporting Standards, including the audit report for the year 2025;
 - ii. The current report of the Board of Directors;
 - iii. The discharge of liability of the members of the Board of Directors who acted in this capacity during the year 2025;
 - iv. The publication of the financial results for the year 2025 in accordance with the legal requirements.

Chairman of the Board of Director
Radu Grațian Ghețea



Vice-Chairman of the Board of Directors
Eugen Goga



Apply or Explain Statement (DAE)

Apply or Explain Statement (APR)

Company Name: LIBRA INTERNET BANK S.A.

Section	Principle	Prev No.	Provision (detailed) Yes	Yes	Partial	No	Explanation (text and url link if the document is on the website)
A: GOVERNING BODIES							
A: GOVERNING BODIES	A.1. The Board shall ensure the long-term success and sustainability of the Company, in the interest of the Company and its shareholders, and taking into account the interests of other stakeholders. The Council must clearly define and make its role and responsibilities fully public.	A.1., 1	The Council must have an internal regulation that formalises and clearly specifies its role and responsibilities. The Articles of Incorporation, the Rules of Procedure of the Board and other internal regulations must clearly delineate the role and powers between the Board, the General Meeting of Shareholders (GSM) and the Executive Management	x			
A: GOVERNING BODIES	A.1. The Board shall ensure the long-term success and sustainability of the Company, in the interest of the Company and its shareholders, and taking into account the interests of other stakeholders. The Council must clearly define and make its role and responsibilities fully public.	A.1., 2	The Rules of Procedure of the Board shall include, inter alia, the duties of the Board, as well as the fiduciary responsibilities of the members of the Board to act in full knowledge of the facts, in good faith, with due diligence and care and in the interest of the Company, its shareholders and taking into account the interests of other interested parties, in accordance with legal requirements.	x			
A: GOVERNING BODIES	A.1. The Board shall ensure the long-term success and sustainability of the Company, in the interest of the Company and its shareholders, and taking into account the interests of other stakeholders. The Council must clearly define and make its role and responsibilities fully public.	A.1., 3	Board should: • Oversee the development and approval of the Company's strategy and ensure that it also integrates sustainability aspects, including social and environmental (E&S) considerations and climate-related risks and opportunities; • Appoint and dismiss the Chief Executive Officer and other members of the executive management to whom executive management responsibilities have been delegated (referred to as "executive management") and ensure succession planning for them; • To supervise the performance of executive management, the role of executive management in addressing material risks and opportunities related to sustainability, and to align executive management compensation with the long-term interests and sustainability of the Company, in accordance with the provisions of the Company's remuneration policy; • Ensure that there is a robust framework for internal control and risk management; •	x			
A: GOVERNING BODIES	A.1. The Board shall ensure the long-term success and sustainability of the Company, in the interest of the Company and its shareholders, and taking into account the interests of other stakeholders. The Council must clearly define and make its role and responsibilities fully public.	A.1., 4	The duration of the appointment of Board members and executive management should be clearly established and should, as far as possible, promote stability and predictability	x			
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 1	The Board must have at least five members.	x			
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 2	The Board must have a diversity policy on the Board and executive leadership and ensure that diversity in terms of gender, age, experience and skills is incorporated into the Nomination Policy	x			
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 3	The Council should develop a profile of the Council specifying the characteristics and desirable traits of its members, including factors such as independence, diversity, integrity, specific skills and experience, knowledge of industry, the ability and willingness to devote adequate time and effort to the responsibilities of the Council, in the context of the needs of the Council and its committees and	x			
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 4	The majority of Council members must be non-executives. At least one third of the members of the Council must be independent. Each independent member of the Council must submit a declaration of independence at the time of his nomination for election or re-election, as well as when any change in his statute occurs, in accordance with the independence criteria provided for in the legislation and in Annex A to the Code.	x			The Bank meets the conditions regarding the legal number of non-executive and independent members of the Board of Directors. The independence criteria and individual suitability assessment procedures for the members of the Board are those provided by the Companies Law no. 31/1990, NBR Regulation no. 5/2013, as subsequently amended and supplemented and the applicable internal regulations. Also, the members of the Board complete the Declaration on Conflicts of Interest, which is updated whenever changes occur, in accordance with the Policy on Conflict of Interest in the case of members of the management body.
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 5	The Nomination and Remuneration Committee (or the entire Board if there is no Nomination and Remuneration Committee) will assess whether the members of the Board can be considered independent on the basis of the factors considered, examining whether there are any business or other personal relationships that could significantly affect the independence and objectivity of the Board member and his or her ability to act in the interest of the Company, shareholders and stakeholders.	x			
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 6	The positions of Chairman of the Board and Chief Executive Officer should be held by different persons.	x			
A: GOVERNING BODIES	A.2. The Council must have the right balance of competences, experience, gender diversity, knowledge and independence in order to be able to carry out its duties and responsibilities effectively.	A.2., 7	If the positions of Chairman of the Board and Chief Executive Officer are held by the same person, it is advisable that the Company appoint an independent Vice-Chairman.				n/a
A: GOVERNING BODIES	A.3. The Council shall ensure that a formal, rigorous and transparent procedure is put in place for the appointment of new members to the Council.	A.3., 1	The Society will develop and publish a Board Member Nomination Policy that shall define the processes and procedures for nominating, electing, or replacing a member of the Board. The nomination policy, approved by the relevant governance body, will describe how the Company receives and evaluates nominations from shareholders (including minority shareholders) or members of the Board, including with regard to the profile of the Board, independence and diversity.	x			There is a Policy on diversity, recruitment and selection, performance management (including individual and collective fitness assessment), and training for identified staff and key functions, approved by the Board of Directors, in accordance with the specific legislation applicable to the banking sector, which regulates the processes and procedures related to the appointment of Board members and their approval by the supervisory authority (BNR). Given the fact that the Bank's shares are not admitted to trading, and the relationship with the shareholders is carried out in accordance with the legal requirements for unlisted companies, the Bank does not publish these internal regulations.
A: GOVERNING BODIES	A.3. The Council shall ensure that a formal, rigorous and transparent procedure is put in place for the appointment of new members to the Council.	A.3., 2	The Board, through the Nomination and Remuneration Committee, if any, shall monitor the process of nominating candidates for the position of member of the Board.	x			

A: GOVERNING BODIES	A.3. The Council shall ensure that a formal, rigorous and transparent procedure is put in place for the appointment of new members to the Council.	A.3., 3	The Company will inform shareholders of the experience and CV of candidates for the position of member of the Board, which they need to make an informed decision on the appointment or renewal of the term of office of the members of the Board, including the following: • candidates' professional commitments and involvements, including executive and non-executive positions in companies, public authorities, non-profit organizations and other organizations; • any existing or potential conflict of interest, including whether they have business, family or other relationships that could affect their performance as a member of the Board; • which shareholder or member of the Board has proposed each candidate for the position of member of the Board.	x				
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 1	The Board will establish an Audit Committee to enhance its oversight capacity over financial reporting, the internal control framework, internal and external audit processes, and compliance with applicable laws and regulations. If it is not required by law or a dedicated risk management committee is not already established, the Audit Committee will also include responsibilities for monitoring	x				
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 2	It is advisable that the composition of the Audit Committee should include only the non-executive members of the Board. It is also advisable that the majority of the members of the Committee be independent, including the Chair of the Committee. The Audit Committee must have, overall, relevant competences in the field in which the Company operates. The Committee and its members must	x				
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 3	The Board of Companies listed in the Premium Category must establish a Nomination and Remuneration Committee consisting of the non-executive members of the Board. It is advisable that the majority of the members of the Committee be independent, including the Chair of the Committee. The Board may also establish a separate Nomination Committee or a Remuneration Committee, if the composition of the Board so permits and if it is justified, given the					
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 4	In addition to its specific responsibilities as set out in this Code, the Nomination and Remuneration Committee: i. Reviews and recommends to the Council the size and composition of the Council and leads the creation and ongoing review of the Council's profile; ii. Identify persons qualified to become members of the Board and Executive Management, if requested; evaluates candidates for executive management positions; evaluates the candidates proposed by shareholders or members of the Board for positions of member of the Board and informs the General Shareholders' Meeting in detail; iii. Makes recommendations to the Council on appointments to committees (other than the Nomination and Remuneration Committee); iv. Coordinate an annual evaluation of the Board, Board members and committees in accordance with the provisions of Principle A.5.; v. Assists the Board in fulfilling its responsibilities related to the Company's remuneration policy; vi. Assists the Council in the development of succession plans for executive management, as well as emergency succession plans and the recruitment process for the Director-General, as appropriate; vii. Oversees the administration of the Company's compensation and benefits plans.					
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 5	The role and responsibilities of the Board committees shall be defined in separate internal regulations (operating regulations) and published on the Company's website. If the Company chooses not to establish any of the committees of the Board that are not required by law, the corresponding tasks and responsibilities shall be carried out by the Board and shall be duly referred to in the Board's rules of procedure.	x				
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 6	The assessment of the independence of committee members, including members of committees appointed by the AGM, shall be carried out in accordance with the same procedure as for independent members of the Council.	x				
A: GOVERNING BODIES	A.4. The Council shall set up committees to assist it in carrying out its key responsibilities, addressing strategic challenges and managing sensitive issues with a high potential for conflict of interest.	A.4., 7	The Chairs of the Audit Committee and the Nomination and Remuneration Committee shall not be the Chair of the Board or other committees, unless justified by the size of the Board.	x				
A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively.	A.5., 1	the Council functions properly. The Council's rules of procedure must contain the role and responsibilities of the President of the Council, and the President of the Council must, at least: • To establish the agenda of Council meetings, to chair these meetings and to ensure that minutes of these meetings are drawn up; • Ensure that the Council receives accurate, timely, useful, succinct information to enable the Council to take correct decisions; • Ensure that the Council has sufficient time for consultation and decision making; • To allow for the proper functioning of the committees and for effective communication with the Council's committees, including operative and relevant reports from the committees to the entire Council; • To ensure that the performance of the Council is evaluated and discussed at least once a year and publicly disseminated according to the provisions of D.L. 3; • Ensure that the Board has an appropriate working relationship with executive management. The Director-General and the Chairman of the Board (if the positions are held by different persons) meet regularly; • Address and manage internal	x				Taking into account the fact that the Bank's shares are not admitted to trading on the capital market, and the relationship with the shareholders is made in accordance with the legal requirements for unlisted companies, the performance of the members of the Board is not publicly disseminated, but is discussed and approved annually, with the involvement of the General Shareholders' Meeting, according to the legislation applicable in the banking sector and the applicable internal regulations.
A: GOVERNING BODIES	A.5. The Board should establish robust procedures for the functioning of the Board, as well as mechanisms for the evaluation and continuous development of the Board, in order to enhance the skills of Board members and their ability to effectively fulfill their responsibilities.	A.5., 2	The Board must meet whenever necessary, but no less than six (6) times per year.	x				n/a
A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively	A.5., 3	The Council may request the appointment of the Secretary-General to assist the Council in complying with its obligations under the law, the Council's rules of procedure and other policies. The Secretary General shall be a senior expert within the Society, responsible for assisting the Board and its committees in organizing their activities, preparing meetings, annually evaluating the performance of the Board and committees, and training programs for Board members, if necessary.		x			At the level of the Bank, a separate structure is established, the Corporate Governance Department, whose duties include providing the secretariat of meetings and managing the organizational aspects related to the organization and conduct of the meetings of the Board of Directors and ensuring its connection with the relevant functions within the Bank, in accordance with the internal regulations governing the workflows involving the Bank.
A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively	A.5., 4	The Council must clearly define the rights and responsibilities, the scope of authority and other matters relating to the Secretary-General.					n/a
A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively	A.5., 5	The Council and its committees must draw up and approve an annual internal work plan identifying the topics to be addressed during the year before the end of the previous year. The plan must take into account the decisions required to be proposed to the GSM, the reporting by the executive management and internal control functions, the required frequency of Council meetings and committees, and must be reviewed by the President with the support of the Secretary General.		x			The activity of the Council and the committees is not carried out on the basis of formal annual plans, but takes into account the attributions incumbent on them according to the Articles of Association and the Organizational and Functioning Regulations, as well as the legal obligations.

A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively	A.5., 6	The Board shall carry out an annual evaluation of the composition, activity and dynamics of the Board as its committees, individually and as a whole, which shall be coordinated by the Nomination and Remuneration Committee.	x				n/a
A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively	A.5., 7	The Nomination and Remuneration Committee must share the results of the Board's evaluation with the entire Board and set out follow-up actions, if necessary, including professional development and training plans for the Board, to fill the gaps.					n/a
A: GOVERNING BODIES	A.5. The Council must put in place robust procedures for the functioning of the Council, as well as mechanisms for the evaluation and continuous development of the Council in order to improve the competences of the members of the Council and their ability to carry out their responsibilities effectively.	A.5., 8	The Board's Rules of Procedure shall impose induction programs for newly appointed Board members, provided by the Society's internal staff. The Council's rules of procedure may refer to continuing education programmes for Council members if necessary. The implementation of the orientation and continuing training programmes for Council members (as decided by the Council) is carried out under the supervision of the Nomination and Remuneration Committee, with the support of the Secretary General. Based on the results of the annual evaluation of the Board, the Nomination and Remuneration Committee together with the Chair of the Board will develop professional development programmes	x				
A: GOVERNING BODIES	A.6. The executive management is responsible for the day-to-day management of the Company. The Board must ensure that executive management is able to effectively lead the Corporation, and the composition, competence, roles, and incentives of executive management support the successful implementation of the Corporation's strategy and plans.	A.6., 1	The executive management must direct the Society and be accountable to the Board. The division of responsibilities between the Board and the executive management and between the various members of the executive management must be clearly articulated in the Company's articles of incorporation and the Company's internal regulations.	x				
A: GOVERNING BODIES	A.6. The executive management is responsible for the day-to-day management of the Company. The Board must ensure that executive management is able to effectively lead the Corporation, and the composition, competence, roles, and incentives of executive management support the successful implementation of the Corporation's strategy and plans.	A.6., 2	When the roles of Chairman of the Board and Chief Executive Officer are exercised by the same person, the different responsibilities of the Chairman of the Board and the Chief Executive Officer must be clearly defined and differentiated in the articles of incorporation of the Company.					n/a
A: GOVERNING BODIES	A.6. The executive management is responsible for the day-to-day management of the Company. The Board must ensure that executive management is able to effectively lead the Corporation, and the composition, competence, roles, and incentives of executive management support the successful implementation of the Corporation's strategy and plans.	A.6., 3	The Board must ensure that the executive management is made up of individuals with the appropriate knowledge, skills, diversity and experience to support the success of the Society's performance, and that there are measures in place to ensure the orderly succession of executive management.	x				
A: GOVERNING BODIES	A.6. The executive management is responsible for the day-to-day management of the Company. The Board must ensure that executive management is able to effectively lead the Corporation, and the composition, competence, roles, and incentives of executive management support the successful implementation of the Corporation's strategy and plans.	A.6., 4	The Board, with the support of the Nomination and Remuneration Committee, shall annually assess the performance of the executive management, the effectiveness of its cooperation with the Board, including the information provided to the Board	x				
B: CADRUL DE ADMINISTRARE A RISCURILOR SI CONTROL INTERN								
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The company shall have an adequate and effective internal control and risk management framework, taking into account its strategy, size, complexity of operations and risk profile, including the potential environmental and social impact of its activities.	B.1., 1	The Board determines the nature and extent of the risks that the Company is willing to assume as necessary to achieve the Company's strategic objectives (i.e. the Company's risk appetite) and must ensure that clear structures, policies and procedures are in place to identify, assess, report, manage and monitor material and emerging risks, including sustainability-related risks, cybersecurity and the use of digital technologies. The Board must explain in the annual report the mechanisms and processes put in place to identify and manage risks.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The company shall have an adequate and effective internal control and risk management framework, taking into account its strategy, size, complexity of operations and risk profile, including the potential environmental and social impact of its activities.	B.1., 2	The Board must adopt a formal risk management policy to ensure the accurate, complete and timely identification, measurement and reporting of risks, the existence of adequate and feasible risk control measures, and the integration of E&S risks into the risk management framework in order to implement the Company's strategy.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The company shall have an adequate and effective internal control and risk management framework, taking into account its strategy, size, complexity of operations and risk profile, including the potential environmental and social impact of its activities.	B.1., 3	The Council and the Audit Committee need to understand the emerging changes related to information technology and artificial intelligence so as to mitigate cybersecurity risks. Time must be given to the risks and opportunities of AI and cybersecurity on the Council's agenda to ensure an understanding of cyber protection.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The company shall have an adequate and effective internal control and risk management framework, taking into account its strategy, size, complexity of operations and risk profile, including the potential environmental and social impact of its activities.	B.1., 4	It is advisable that the Company establish a risk management function responsible for ensuring the accurate, complete and timely identification of risks, ensuring that appropriate and feasible risk control measures are in place and risk management procedures are monitored. The risk management function, through the Risk Management Officer (CRO), if any, must have direct communication and functional reporting to the Board and the Audit Committee (if there is no dedicated Risk Committee)	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The company shall have an adequate and effective internal control and risk management framework, taking into account its strategy, size, complexity of operations and risk profile, including the potential environmental and social impact of its activities.	B.1., 5	The Board, assisted by the Audit Committee, shall assess at least annually the adequacy and effectiveness of the Company's risk management and internal control framework (including operational and compliance controls) and make relevant recommendations. The assessment shall take into account the effectiveness and scope of the internal audit function, the adequacy of risk management and compliance, the internal control reports, if required by applicable law, addressed to the Board Audit Committee, the responsiveness and effectiveness of management in addressing identified weaknesses or weaknesses in internal control, and the submission of relevant reports to the Council.	x				

B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.1. The company shall have an adequate and effective internal control and risk management framework, taking into account its strategy, size, complexity of operations and risk profile, including the potential environmental and social impact of its activities.	8.1. 6	The Board shall develop and make available on the Company's website, free of charge, a whistleblowing mechanism that allows employees and other interested parties to disclose alleged violations or irregularities under applicable law.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee shall assist the Board in ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework, and maintaining an appropriate relationship with the Company's external auditors.	8.2. 1	In addition to its responsibilities set out in the legislation and elsewhere in the Code, the Audit Committee shall: • To review the internal controls and risk management framework in the Company; • Monitor the development and implementation of the Company's policies regarding conflicts of interest and transactions with related parties; • To ensure the independence and review the effectiveness of the Company's internal audit function and to make recommendations to the Board; • To supervise the internal audit function; • Oversee the preparation of sustainability-related reports and the information included therein, unless this task is assigned to another committee; • Oversee the framework for ensuring the Company's compliance with	x				The Audit Committee is not a party to the process of reviewing the risk management framework, given that at the level of the Bank there is a specialized committee that has attributions in this regard, the Risk Management Committee; The Audit Committee does not participate in the development of policies on conflicts of interest and transactions with related parties, but ensures the monitoring of the application of these requirements through the Internal Audit Division, approving the Audit Reports; The Audit Committee oversees the framework for ensuring the Bank's compliance with applicable legal or regulatory requirements, as well as internal regulations, through the Internal Audit Division
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee shall assist the Board in ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework, and maintaining an appropriate relationship with the Company's external auditors.	8.2. 2	Whenever the Code mentions reviews or analyses to be carried out by the Audit Committee, they must be followed by periodic (at least annual) or ad-hoc reports to be submitted to the Board.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee shall assist the Board in ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework, and maintaining an appropriate relationship with the Company's external auditors.	8.2. 3	The Audit Committee must monitor the independence and objectivity of the external auditor. The Committee should approve a policy on the provision of non-audit services permitted by the external auditor, in accordance with legal requirements, and ensure the implementation of this policy. The Committee's findings on the independence of the external auditor shall be made public in the annual report.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.2. The Audit Committee shall assist the Board in ensuring the integrity of financial and non-financial reporting, establishing an effective risk management and internal control framework, and maintaining an appropriate relationship with the Company's external auditors.	8.2. 4	The Audit Committee must discuss the annual work plan with the external auditor, covering the scope and materiality of the activities to be audited. The Audit Committee must meet with the external auditor whenever necessary to discuss the problems identified and to monitor the quality of the services provided.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board shall ensure the independence of the internal audit function. The Company's internal audit function must provide independent and objective assurance on the effectiveness of the risk management and internal control framework.	8.3. 1	The Board must ensure that internal audit has the appropriate authority, resources and procedures to assist the Board in ensuring the effectiveness and efficiency of the Company's risk management and internal control framework.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board shall ensure the independence of the internal audit function. The Company's internal audit function must provide independent and objective assurance on the effectiveness of the risk management and internal control framework.	8.3. 2	In order to ensure that the core functions of internal audit are carried out, the person responsible for this function must be appointed and report functionally directly to the Board through the Audit Committee, which is responsible for approving his or her appointment and dismissal. This is without prejudice to administrative reporting to the Chief Executive Officer and the exchange of information with the Company's executive management, in accordance with legal requirements and professional standards.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board shall ensure the independence of the internal audit function. The Company's internal audit function must provide independent and objective assurance on the effectiveness of the risk management and internal control framework.	8.3. 3	The internal audit function must be established in accordance with applicable legal requirements and industry standards (e.g. the Institute of Internal Auditors). The internal audit authority, composition, remuneration, annual budget, working procedures and other relevant matters will be regulated in an internal internal audit regulation, approved by the Council, following the recommendation of the Audit Committee.	x				
B: RISK MANAGEMENT AND INTERNAL CONTROL FRAMEWORK	B.3. The Board shall ensure the independence of the internal audit function. The Company's internal audit function must provide independent and objective assurance on the effectiveness of the risk management and internal control framework.	8.3. 4	The Audit Committee must agree on an annual internal audit work plan with the internal auditor, receive internal audit reports, updates on key audit aspects, monitor the implementation of internal audit recommendations and provide the necessary guidance.	x				
C: PERFORMANCE, MOTIVATION AND REWARD								
C: PERFORMANCE, MOTIVATION AND REWARD	C.1. The members of the Board shall receive remuneration commensurate with the volume and importance of their duties and responsibilities, rather than the performance of the management or the Company. The structure and amount of remuneration for the Board member shall enable the Company to attract, retain and motivate competent and qualified Board members.	C.1. 1	Board members must receive remuneration, according to the Company's Remuneration Policy. Members who are also members of the Council's committees must receive additional remuneration for this activity. But in no case will the remuneration be linked to the number of meetings of the Council or the Committee.	x				
C: PERFORMANCE, MOTIVATION AND REWARD	C.2. The Board shall ensure that there is a formal and transparent policy and procedure for determining executive management remuneration that is aligned with the Company's long-term interests and the Company's strategy. This policy will be presented to the GSM, by way of approval, in accordance with legal requirements.	C.2. 1	The Board shall determine the annual remuneration of executive management, based on the recommendations of the Nomination and Remuneration Committee and in accordance with the Company's Remuneration Policy. The remuneration policy must be drawn up in accordance with the relevant legal requirements.	x				
C: PERFORMANCE, MOTIVATION AND REWARD	C.2. The Board shall ensure that there is a formal and transparent policy and procedure for determining executive management remuneration that is aligned with the Company's long-term interests and the Company's strategy. This policy will be presented to the GSM, by way of approval, in accordance with legal requirements.	C.2. 2	The levels of remuneration for the members of the executive management and the key performance indicators taken into account in determining the variable (performance-based) part of the remuneration must be established in advance and be measurable and appropriate in relation to the agreed strategy and risk appetite, the economic environment in which the Company operates, and the remuneration and conditions of the Company's employees. In particular, they should include indicators relating to non-financial performance and appropriate sustainability targets	x				

C: PERFORMANCE, MOTIVATION AND REWARD	C.2. The Board shall ensure that there is a formal and transparent policy and procedure for determining executive management remuneration that is aligned with the Company's long-term interests and the Company's strategy. This policy will be presented to the GSM, by way of approval, in accordance with legal requirements.	C.2., 3	The Company's shares and/or stock options must represent a significant portion (e.g. not less than 10%) of the total variable remuneration of the executive member.	x			
D: PERFORMANTA, MOTIVARE SI RECOMPENSA							
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 1	The Company shall ensure that it provides accurate, complete and timely financial and operational information, including quarterly, half-yearly and annual reports, as well as current reports. Companies must ensure that all relevant information is easily accessible to investors, including through the Company's website and other sources of public information, as appropriate.	x			The mandatory current and periodic reports for bond issuers are published in the dedicated section of Banca https://www.librabank.ro/obligatiuni 's website and on the BVB website. The bank is not required to prepare quarterly reports for investors
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 2	It is advisable for the Company to have an Investor Relations (IR) function and must appoint a dedicated person responsible for the IR function. The contact details of the person or persons responsible for the IR function will be available on the Company's website. The IR function will report directly to the Chief Executive Officer/Chief Financial Officer, emphasizing his importance in the Company's hierarchy and emphasizing his central role in managing and communicating the Company's commitments and		x		Considering that the Bank's shares are not admitted to trading on the capital market, the communication with the Bank's shareholders is carried out by fulfilling the mandatory advertising formalities according to the law and directly. The bond issues
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The Company must include on its website a section dedicated to Investor Relations, with all relevant information of interest to investors, available in both Romanian and English.	x			Considering that the Bank's shares are not admitted to trading on the capital market, the communication with the Bank's shareholders is carried out by fulfilling the mandatory advertising formalities according to the law and directly. Corporate regulations, such as the updated articles of incorporation, the procedures of the General Shareholders' Meeting, the internal rules of the Board and the internal regulations of the committees of the Board, are not published on the website. The rules of operation of the General Shareholders' Meeting are set out in the Companies Law and the Articles of Incorporation. Information on the functioning of the Board and the committees can be found in the Annual Report and the Report on Transparency Requirements, published on the Bank's website (https://www.librabank.ro/rapoarte-LibraInternet-Bank)
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • Main corporate regulations: updated Articles of Incorporation, GSM procedures, Board Rules of Procedure and Board Committees' Rules of Procedure;	x			x On the Bank's website, in the dedicated section (https://www.librabank.ro/conducere), as well as in the periodic reports published (Annual Report, Report on Transparency Requirements https://www.librabank.ro/rapoarte-LibraInternet-Bank) there is information on the Bank's management, including the list of current members of the Board of Directors, professional training and seniority on the Board. Information on other positions held by the members of the Bank's management is analysed in the nomination/suitability assessment process and brought to the attention of the supervisory authority in the authorisation process. Also, at the level of the Bank, there is and is monitored the Policy on conflicts of interest.
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • List of current members of the Board, Board committees and Executive Management, with mention of their updated status of independence, professional CVs (containing at least: name, surname, gender, nationality, age; professional experience by years, position and society; education, field of study and academic or professional institution awarding the degree), other professional commitments, including executive and non-executive positions on boards of directors in companies, non-profit organizations and state institutions; the relationship with the shareholders who hold at least 5% of the voting rights/shares issued by the Company; the duration of the appointment of the members of the Board, the committees and the executive management, specifying the date from which they were appointed;	x			Pe pagina de Internet a Bancii, în secțiunea dedicată (https://www.librabank.ro/conducere), precum și în rapoartele periodice publicate (Raportul anual, Raportul privind cerințele de transparență - https://www.librabank.ro/rapoarte-Libra-Internet-Bank) se regasesc informatii referitoare la conducerea Bancii, inclusiv lista membrilor actuali ai Consiliului de Administratie, pregătirea profesională și vechimea în cadrul Consiliului. Informatii cu privire la alte functii detinute de membrii conducerii Bancii sunt analizate în procesul de nominalizare/evaluare a adecvării și aduse la cunoștința autorității de supraveghere în procesul de autorizare. De asemenea, la nivelul Bancii exista și este monitorizată Politica privind conflictele de interese.
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • Current and periodic reports (quarterly, half-yearly and annual reports);	x			On the Bank's website there is a section specific to the bond issue (https://www.librabank.ro/obligatiuni) where you can find all the information related to the issuance of Libra Internet Bank bonds . At the same time, the mandatory reports according to the law for the issuers of bonds admitted to trading are published (the Bank does not have the oblig
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • Information regarding the GSM: agenda, supporting materials and decisions taken; the procedure for holding the General Shareholders' Meeting; The Nomination Policy, together with the professional CVs (containing at least: name, surname, gender, nationality, age; professional experience by years, position and company; studies, field of study and academic or professional institution awarding the diploma), as well as any other information specified in A.3., 3; communication channels through which shareholders can ask questions to the Company; replies to shareholders' questions related to the agenda; the declarations of independence of the candidates to the Board and the assessments made by the Nomination and Remuneration Committee/Council for the candidates, including on their compliance with the independence criteria;	x			Given that the Bank's shares are not admitted to trading on the capital market, the Bank does not publish on its website the materials related to the organization and conduct of the meetings of the General Shareholders' Meeting, but makes public, according to the law, the agenda and decisions taken by the General Shareholders' Meeting. Considering that the Bank's shares are not admitted to trading on the capital market, the communication with the Bank's shareholders is carried out by fulfilling the mandatory advertising formalities according to the law and directly. Current and periodic reports are also published. On the Bank's website there is a section specific to the bond issue (https://www.librabank.ro/obligatiuni) where you can find all the information related to the issuance of Libra Internet Bank bonds .
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • Information on the evaluation of the Board, carried out in accordance with A.5., 7 including the evaluation criteria and process, as well as a summary of the results of the evaluation and the actions that have been or will be taken as a result of the evaluation;	x			Given that the Bank's shares are not admitted to trading on the capital market, the Bank does not publish such materials on its website. The evaluation of the activity of the Board of Directors is subject to the approval of the General Meeting of Shareholders. On the Bank's website there is a section specific to the bond issue (https://www.librabank.ro/obligatiuni) where you can find all the information related to the issuance of Libra Internet Bank bonds
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • Information about corporate events, such as the payment of dividends and other distributions to shareholders or other events that lead to the acquisition or limitation of a shareholder's rights, including the terms and principles applied to such transactions. This information must be published in a timeframe that allows investors to make investment decisions;	x			Taking into account that the Bank's shares are not admitted to trading on the capital market, communication with the Bank's shareholders is carried out by fulfilling the mandatory advertising formalities according to the law and directly. On the Bank's website there is a section specific to the bond issue (https://www.librabank.ro/obligatiuni) where you can find all the information related to the issuance of Libra Internet Bank bonds , including on the payment of coupons related to the Bank's bond issues.

D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 3	The company must include in the section dedicated to Investor Relations: • Corporate policies, including the Code of Conduct, the Dividend Policy, the Remuneration Policy, the Forecasting Policy, the Investor Communication Policy, the Social Responsibility (CSR)/Sponsorship Policy, the Affiliated Party Transactions Policy, the Diversity, Equity and Inclusion Policy, and the Whistleblowing Policy (if not already part of the Code of Conduct);			x	Given that the Bank's shares are not admitted to trading on the capital market, the Bank does not publish such information on the website. The Bank fulfills its legal obligations in relation to the bondholders, according to the law, including through the specific section of the Bank's website(https://www.librabank.ro/obligatiuni). The policies and other internal regulations are approved by the competent management body and published on the Bank's intranet. In terms of whistleblowing, on the Bank's website there is a dedicated email address (etica@librabank.ro)
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 4	The company must hold at least two meetings/conference calls with analysts and investors each year. The information presented on these occasions must be published in the IR section of the Company's website at the time of meetings/teleconferences.			x	Considering that the Bank's shares are not admitted to trading on the capital market, the communication with the Bank's shareholders is carried out by fulfilling the mandatory advertising formalities according to the law and directly. The bank does not organize meetings/conferences with analysts. The Bank fulfills its legal obligations in relation to the bondholders, according to the law, including through the specific section of the Bank's website (https://www.librabank.ro/obligatiuni).
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 5	The Company must disclose significant and reportable non-financial and sustainability issues, with a focus on environmental, social and governance (ESG) issues of its business and operations, in accordance with the recognized sustainability reporting standard. The Company's sustainability statements will be published on its website.	x			
D: PERFORMANCE, MOTIVATION AND REWARD	D.1. The Company shall ensure adequate communication with shareholders, investors, regulators and other stakeholders and establish appropriate systems for financial and sustainability reporting.	D.1., 6	The company must have a CSR/sponsorship policy to guide the activity in the field of supporting CSR activities and sponsorship.	x			
D: PERFORMANCE, MOTIVATION AND REWARD	D.2. The Company shall ensure the fair and equitable treatment of all shareholders, as well as the availability of the means and information necessary to enable shareholders to exercise their rights in relation to the Company.	D.2., 1	The Company must have a dividend policy as a set of directions that the Company intends to follow in terms of distributing net profit	x			
D: PERFORMANCE, MOTIVATION AND REWARD	D.2. The Company shall ensure the fair and equitable treatment of all shareholders, as well as the availability of the means and information necessary to enable shareholders to exercise their rights in relation to the Company	D.2., 2	The procedure for holding the General Shareholders' Meeting must not restrict the participation of shareholders in the General Shareholders' Meeting and the exercise of their rights. The amendments to the procedure for holding the GSM must enter into force, at the earliest, from the next GSM.	x			
D: PERFORMANCE, MOTIVATION AND REWARD	D.2. The Company shall ensure the fair and equitable treatment of all shareholders, as well as the availability of the means and information necessary to enable shareholders to exercise their rights in relation to the Company.	D.2., 3	External auditors must attend the General Shareholders' Meeting where the reports are presented to them, in order to answer shareholder questions			x	The report of the Board of Directors, presented at the General Meeting of Shareholders, is endorsed by the auditors and includes a separate chapter specifying all the proposals that are made regarding the distribution of profits and the granting of dividends.
D: PERFORMANCE, MOTIVATION AND REWARD	D.2. The Company shall ensure the fair and equitable treatment of all shareholders, as well as the availability of the means and information necessary to enable shareholders to exercise their rights in relation to the Company	D.2., 4	The Board shall submit to the Annual General Meeting a summary of the assessment of the adequacy and effectiveness of the risk management and internal control framework, in accordance with the incidental information included in the annual report.	x			
D: PERFORMANCE, MOTIVATION AND REWARD	D.2. The Company shall ensure the fair and equitable treatment of all shareholders, as well as the availability of the means and information necessary to enable shareholders to exercise their rights in relation to the Company.	D.2., 5	The company must stimulate engagement with shareholders and investors by: • Encouraging the active participation of shareholders in the General Meetings of Shareholders, including ensuring the conditions for virtual participation; • Organizing regular briefings and updates for investors, especially during significant corporate events; • Establishing channels for shareholders to provide feedback and ask questions, ensuring that responses are provided in a timely and comprehensive manner.		x		Considering that the Bank's shares are not admitted to trading on the capital market, the communication with the Bank's shareholders is carried out by fulfilling the mandatory advertising formalities according to the law and directly. The bank fulfills its obligations provided by law in relation to shareholders and bondholders.
D: PERFORMANCE, MOTIVATION AND REWARD	D.2. The Company shall ensure the fair and equitable treatment of all shareholders, as well as the availability of the means and information necessary to enable shareholders to exercise their rights in relation to the Company.	D.2., 6	Any professional, consultant, expert or financial analyst may participate in the GSM at the prior invitation of the Chairman of the Board. Accredited journalists may also participate in the GSM, unless the President decides otherwise.			x	The rules regarding the General Meeting of Shareholders (convening, conduct) are those provided by the Companies Law no. 31/1990, republished, with subsequent amendments and completions, and in the Bank's Articles of Incorporation and do not provide for this possibility
E: DURABILITATE SI PARTILE INTERESATE							
E: SUSTAINABILITY AND STAKEHOLDERS	E.1. The company shall integrate sustainability aspects into its strategy and mitigate any adverse material, social and environmental impacts of its operations, to the extent possible.	E.1., 1	The Board must ensure that sustainability, environmental and social considerations are integrated into the Company's strategy and operations, risk management and remuneration practices and oversees this integration. A specialised sustainability committee or one of the Council's standing committees assists the Council in carrying out these tasks.		x		Sustainability aspects are integrated into the lending activities, the ESG risk level of the loan portfolio is monitored monthly and reported to the management body, and operational risk incidents are also assessed in terms of ESG risk links. At the same time, the performance objectives at the management level include sustainability aspects (performance/training, as the case may be). At the level of the Bank, the Sustainability Team is constituted, whose attributions are provided for in the Organization and Functioning Regulations, which reports to the executive management. The Risk Management Committee (standing committee) assists the Board in assessing ESG risks at Bank level, to the extent that internal procedures establish the competence of the RAC and the Board in the decision-making flow. The Bank is in the process of developing, in accordance with regulatory requirements, the Prudential Transition Plan and the Sustainability Strategy.
E: SUSTAINABILITY AND STAKEHOLDERS	E.1. The company shall integrate sustainability aspects into its strategy and mitigate any adverse material, social and environmental impacts of its operations, to the extent possible.	E.1., 2	The Board must ensure that the Company's operations are conducted in accordance with national and international E&S standards and that the Company's E&S policies are consistent with its long-term objectives. In particular, the Company must have internal documents relating to its environmental and social responsibilities, as well as policies and procedures that enable it to identify significant factors and assess the impact on the Company's activities.	x			

E: SUSTAINABILITY AND STAKEHOLDERS	E.1. The Company shall integrate sustainability aspects into its strategy and mitigate any adverse material, social and environmental impacts of its operations, to the extent possible	E.1., 3	Whenever a decision to be taken by the Board has a potential significant and negative impact on the E&S sphere, the Board shall receive from the Executive Management (i) an analysis of how this decision is aligned with the Company's sustainability objectives and E&S policies or (ii) the proposal of measures to mitigate the negative E&S impact.	x				Based on the Dual Materiality Analysis, the Board annually approves the Bank's Sustainability Statement, which describes the main impacts (positive and negative), risks and opportunities resulting from the Bank's activities. As part of the lending process, the ESG risk assessment is carried out for each transaction, including those loans whose approval competence belongs to the Board. The Bank is in the process of developing, in accordance with regulatory requirements, the Prudential Transition Plan and the Sustainability Strategy.
E: SUSTAINABILITY AND STAKEHOLDERS	E.2. The Company must have a process for identifying stakeholders affected by the Company's operations. The Board must take into account the interests of stakeholders and ensure that there is active communication between the Company and stakeholders.	E.2., 1	The Board must ensure that there is a formal process in place to identify the Company's stakeholders, including investors, creditors, customers, employees and suppliers, as well as specific approaches for engaging priority stakeholders.	x				
E: SUSTAINABILITY AND STAKEHOLDERS	E.3. The Board shall adopt a Code of Conduct (Code of Ethics) with an appropriate scope, including guiding principles reflecting the Company's commitment to ethics, integrity and quality of performance.	E.3., 1	The Board must develop a statement of purpose and a vision statement, as well as articulate the values of the Society so that the entire organization understands the strategic direction of the Society.	x				
E: SUSTAINABILITY AND STAKEHOLDERS	E.3. The Board shall adopt a Code of Conduct (Code of Ethics) with an appropriate scope, including guiding principles reflecting the Company's commitment to ethics, integrity and quality of performance.	E.3., 2	The Board must adopt a Code of Conduct for Board members, executive management and employees of the Society, with clear provisions aimed at preventing and sanctioning fraud and bribery. The Board shall not allow any derogation from the ethics requirements for any member of the Board, executive management or employee.	x				
E: SUSTAINABILITY AND STAKEHOLDERS	E.3. The Board shall adopt a Code of Conduct (Code of Ethics) with an appropriate scope, including guiding principles reflecting the Company's commitment to ethics, integrity and quality of performance.	E.3., 3	The Board must ensure that the policies in the Code of Conduct are integrated into the Company's practices and incorporated into the process of integrating new employees into the Company. The Council must ensure the effective implementation and monitoring of compliance with the Code of Conduct and review it regularly.	x				

ANNEX 1- LIST OF PERSONS AFFILIATED

Entity
3 LASER BEAUTY SRL
4R CAPITAL LLC
ACTIVE SOFT SRL
ADRIAN GHEORGHIU
ANDREAS SANTIS
ANDREI MIRIAM-ELENA
ANDREI SIMINEL CRISTIAN
ANGELA AVGOUSTI
ANGHEL DANIELA CRISTINA
ANGHEL LUCIAN-CLAUDIU
Anghel M Daniela Cristina Medic Specialist Neurologie PFA
ANGHEL MATEI CIPRIAN
ANGHEL NONNA
ANGHEL SABINA ANDRA
ANGHELUTA MARIA ELENA
APART POIANA ESTATE SRL
ARHIVARE DOCUMENTE SRL
ARTEMIS ORFANIDOU KLEANTHOUS
ASM CONSULTING DIVISION SRL
ASOCIATIA BEST MUSIC
Asociatia Expertilor in Risk Management
AXENTE TINITA
BAFIN CONSULTANTA SRL
BALTA FLAVIA
BARBULETE ELENA
BARBULETE GHEORGHE
BEJU VIRGINIA
BELLOIU RADU- FLORIAN
BESLIU AUREL
BESLIU C MARIEA
BIL GIULESTI PROPRIETATI SA
BIL INVESTITII SA
BIL MALIUC PROPRIETATI SRL
BIL PORTOFOLIO SA
BIL TERENURI SA
BIROUL DE CREDIT
BITFACTOR SRL
BITTNET SYSTEMS SA
BOB IOT ENTERPRISE S.R.L.
BOBNET HOLDINGS LTD
BOBNET RO SRL
BOJIN CONSTANTA

Entity
BROADHURST INVESTMENTS LTD.
BUICA NICUSOR-MARIAN
BUSINESS MICROCREDIT IFN S.A.
BUZGAN ANDREI
CARPA ENTERPRISES LIMITED SEDIU PERMANENT ROMANIA
CASIAN TRAIAN SABAU
CATALIN DUMITRESCU
CATALIN RASVAN RADU
CENTREVILLE OFFICES SA
CERBU ALEXANDRU
CERBU CORNEL
CERBU SORIN-CATALIN
CIOBANU CATALINA
COCOR S.A.
CODEVENTOR S.R.L.
COMAN PAVEL
CONSTANTINESCU GABRIEL-CLAUDIU
COSMA ADRIAN DUMITRU
COSMA ANDREI AUREL
COSMA MADALINA
COSMA MARIA EUGENIA
CRACIUNAS BOGDAN-LUCIAN
CREDIMATIC NETWORK SRL
CREDIUS IFN
CRÎSMARIU LACRAMIOARA
CUCOS IULIA
CUCOS VASILE
DABU MIHAELA
DEPARTAMENTUL DE ACHIZITII SRL
DEPO MET SA
DIANA MARIA SITA
DIMA DANA-LUCIANA
DOCTORDERMATOLOG A-Z SRL
DOGA EVGHENII
DOLINSKAIA OXANA
DRAGAN ADELA
DRAGAN AURORA
DRAGAN CRISTIAN-DRAGOS
DRAGAN PETRICA
DRAGAN SEBASTIAN
DRAGAN VLAD
DRAGOMIR DANIEL
DRAGOMIR FLORINELA
DUMITRU ALEXANDRU

Entity
DUMITRU IOANA-GRATIELA
DUMITRU VERONICA MARIANA
EFTYCHIA SPYROU
ELECTROAPARATAJ SA
ELENA ADNANA BUHOCIU
ELJ AUTOMOTIVE SA
ELJ CONSTRUCT PLAST SRL
ELJ PROPRIETATI SRL
ELJ REAL ESTATE SA
ENACHE COSMIN MIHAI
ENERGO INDUSTRIAL IMOBILI SA
EPURE SERBAN-MARIAN
EUROPA CAPITAL SA
EVAN SHOP CONCEPT SRL
FINOPRO IFN S.A.
FIRANESCU NICOLETA
FIT 9 BY ALMA SRL
FLORIAN MARCEL PINCU
FOOD VISION SRL
FRÎNCU GHEORGHE
FUNDATIA GROWUP
GANGAN SERGHEI
GARANTI BANK SA
GBN IMOBILI SRL
GEOAGRI CADASTRU SRL
GEORGESCU CORNELIA
GHEORGHE CHITU
GHEORGHISOR FLORICA
GHEORGHISOR FLORIN-VALENTIN
GHEORGHISOR MARIA VALENTINA
GHEORGHISOR MIHAI-ALEXANDRU
GHEORGHISOR TITU
GHEORGHIU MARILENA
GHETEA CATRINEL
GHETEA RADU GRATIAN
GHETEA RAZVAN CIPRIAN MARIUS
GHIDANAC ALINA-MARIA
GHIDANAC DANIELA-NICOLETA
GHIDANAC MIHAI IOAN
GHINEA ANICA
GIRNET MIHAIL
GOGA CALIN TUDOR
GOGA CAMELIA-MARIA
GOGA EUGEN

Entity
GOGA MARIA SOFIA
GOIA DOREL
GOLOMOZ ADRIAN
GRANTED SYSTEM SOLUTIONS SRL
HAGIU SEVASTITA
HAGIU SILVIU TEODOR
Haidu ALBERT-LUCIAN
Haidu CARMEN MARIA
Haidu DANIELA-NICOLETA
Haidu DANIELA-NICOLETA PERSOANA FIZICA AUTORIZATA
Haidu RARES ALEXANDRU
Haidu TUDOR NICHOLAS
HATHOR SERVCOM SRL
HESKETH ENTERPRISES LIMITED
IANCIUC VIOREL
IFTODE CHITA
IFTODE VALERICA
ILAS IOANA MIHAELA
ILIESCU ALINA IONELA
IMEDIA PLUS GRUP SA
IMPROVEMENT SOLUTIONS SRL
IMS PARK DEVELOPMENT SA
IMS PROPRIETATI SA
INFOTURISM MEDIA SRL
INTEGRAL COLLECTION
IONEL SITA
IORGA DANUT
IPROMET IMOBILI SA
IRINA GABRIELA SITA
KALINOV VLADIMIR - NIKOLOV
KOVACS TUNDE-ELISABETA
LA RISERVA PRIVATA S.R.L
LACHE TATIANA
LAPWORTH HOLDINGS LTD
LASZLO VASILE-ALEXANDRU
LIBRA DEVELOPMENT IFN SA
LORENA PETCU
LUCA ANDREI SITA
MACHTEAM SOFT SRL
MADALINA OTILIA TEODORESCU
MADESCU ADRIAN
MAHIKA VOICONI ANA
MAHIKA VOICONI CRISTINA CARMEN
MAHIKA VOICONI SORIN CONSTANTIN

Entity
MAHIKA VOICONI TUDOR
MAZILU ANDRA
MAZILU DANUT
MAZILU DANUT INTREPRINDERE FAMILIALA
MAZILU GABRIELA
MAZILU MARA
MAZILU VASILE
METEX BETA SA
METEX BIG SA
METEX GAMMA SRL
MHK FIVE STAR CONSULTING SRL
MIHAILA-MOLDOVAN IULIA DANIELA
MILOAIE ALIN
MOARA DE FOC IMOBILI SA
MOISE CATALIN TEODOR
MOTORACTIVE IFN SA
MOZA DOREL ANTON
MUCIBABICI GEORGE TOMA
MULTINODE NETWORK S.R.L.
NABLA MANAGEMENT SRL
NCH BALKAN ASSOCIATES LLC
NCH BALKAN FUND L.P.
NCH CAPITAL INC.WILMINGTON - SUCURS
NEDELCU ROXANA-IOANA
NEOMAGASSIN SRL
NET CONS MANAGEMENT SRL
NICOLAE ANA-EMILIA
NICOLAE FLORICA
NICOLAE MIRCEA
NINA IOSIF
NOW IT WORKS SRL
O.C.N CREDIT RAPID SRL
OANA HAGIU IFTODE
OCHIAN GELU
OCHIAR MARIA
OLOGU-HANCER MIHAI-IONUT
OMER MERAL
OMNITEST LABORATOR SA
OTEL VIRGINIA ELENA
OXFORD NATION SRL
PALACE S.A SINAIA
PALTIM SA
PANA ANA
PANA MARIA ELENA

Entity
PETRE MELINTE ANDREI
PETRE-MELINTE CRISTINA
PETRE-MELINTE ION
PETRE-MELINTE OVIDIU
PETRE-MELINTE ROXANDRA
PIESEAUTO.RO MARKETPLACE SRL
POPA MARIA EVELINA
POPA MELANIA
POPA MIHAI-GIUSEPPE
POPA STEFAN ALEXANDRU
POPESCU EUGEN
POPUSOI VICTOR
PORTOMET ADVISORY SRL
POSTOLACHE CASIAN
POSTOLACHE PETRONEL MANUEL
POSTOLACHE PHILIP
PRECUP ANDREI ANTON
PREDA ADRIAN
PREDA MUGUR
PRICOPE NASTASE
PRICOPE CRISTIAN - CLAUDIU
PROPRIETATI FINCONTA SRL
PUSCAS VASILE
RADU NICOLAE
RAȚA OLGA
RENALO INVESTMENTS LIMITED SEDIU PERMANENT ROMANIA
RING AFACERI SA
RISC ADMIN SRL
RISCO SERVICII FINANCIARE SRL
RMRT MAG SA
ROGOJANU LUCA VICTOR
ROGOJANU MIOARA-ROXANA
ROHR GEORGE
ROMARTA ADMINISTRATIV SRL
ROMARTA INDUSTRIAL SA
ROMARTA SA
ROMLUX LIGHTING COMPANY SA
ROMSTAR LIGHT SRL
RUS ADRIAN IOAN
SAPTE SPICE SA
SCALA SA
SCANTEIANU CRISTINA
SCHADEN INSPEKTION ROMANIA SRL
SERBAN SILVIANA

Entity
SERGIU ROSCA
SINAIA IMOBILI SRL
SIRBU GEORGE
SIRBU LARA ANDREEA
SIRBU LIVIA
SIRBU LUMINITA STELA
SIRBU MARIA CRISTINA
SIRBU MIHAELA
SIRBU MIHAELA CONSULTANT FISCAL
SIRBU VALERIU
SITA TUDOREL
SITA VASILICA
SITARU RADU - MIHAIL
SOARE ANDREEA MARIA
SOARE ELENA MADALINA
SOARE LIVIU MANUEL
SOARE TURCU ELVIRA
SPV INVESTIS IMOB SA
SQUAREMEDICAL SA
STAMATIAN ALEXANDRU
STAMATIAN ANDREI-LIVIU
STAMATIAN BEATRICE ALEXANDRA
STAMATIAN CRISTINA
STAMATIAN IRINA
STAMATIAN VASILE FLORIN
STANEAN ALEXANDRU
STECHELT ENTERPRISES LIMITED
STEFANI ORFANIDOU
STOENESCU OANA-MARIA
TABACINIC MORIS
TECHSPOT SOLUTIONS SRL
TELERENTA SRL
TERAPLAST S.A
TESEDEANU COSTIN-GABRIEL
TESEDEANU LUCA GABRIEL
TESEDEANU MIHAI DANIEL
TIMOFAN IONELA
TIMPASCU LIVIA GABRIELA
TODERASCU DANIEL
TOMA CORNELIU
TOMA ERIC-ANDREI
TOMA FILIP-IOAN
TOMA GEORGIANA ROXANA
TOMA IOAN-PAVEL

Entity
TOMITA TIBERIU-FLORIN
TOP MARKET SRL
TRADEVILLE
TRANSFOND
TRITTICO HOLDINGS LIMITED
TUDORIU CONSTANTIN-SORIN
TWELVEBYTES SOCIETATE CU RASPUNDERE LIMITATA
ULICI LAURENTIU FLAVIUS
ULINIUC MIHAELA GABRIELA
UMBRES ALEXANDRU
UMBRES GEORGIANA ALINA
UMBRES IONEL
UMBRES MARIA
UMBRES MARIA DIANA
UNGUREANU ELISABETA
UNGUREANU VALENTIN
VALM TERENURI SA
VILCU ANA MARIA
VILCU DRAGOS-CRISTIAN
VILCU IONEL
VILCU MIHAELA
VILCU MIRUNA
VILSANOIU SIMONA GABRIELA
VIZITIU PETRU
VOINEA GEORGETA
VOINEA ION
VP IMMOBILI SA
VP MAGASSIN SA
VP REALTY SA
VP TERENURI SRL
WINI IMOBILI SA
ZBANCA SERGHEI

Annex 2- LIST OF BRANCHES

1. Branch BUCHAREST - registered with the Trade Register under no. J40 / 396/1998, which has been operating starting from 1 February 1998;
2. Branch BĂNEASA - registered with the Trade Register under no. J40 / 5917/1998, which has been operating starting from 1 May 1999;
3. Branch ORADEA - registered with the Trade Register under no. J05 / 770/2000, which has been operating since 12 February 2001;
4. Branch CONSTANTA - registered with the Trade Register under no. J13 / 1769 / 13,10,2000, which has been operating since 06 March 2001;
5. Branch STEFAN CEL MARE - established on 22 December 2005 by transforming the Agency AVIATORILOR (Agency which has been operating since 21,05,2001);
6. Branch IULIU MANIU - established on 16 February 2005, registered with the Trade Register under no. J40 / 2915/2005;
7. Branch PANTELIMON - established on 02 February 2005, registered with the Trade Register under no. J40 / 1826/2005;
8. Branch BUZAU - established on 20 April 2005, registered with the Trade Registry under no. J40 / 536/2005;
9. Branch PITESTI - established on 16 June 2005, registered with the Trade Registry under no. J03 / 1178/2005;
10. Branch PLOIESTI2 - established on 27 March 2006, registered with the Trade Registry under no. J29 / 674/2006;
11. Branch MOSIŁOR - established on 08 November 2005, registered with the Trade Registry under no. J40 / 18810/2005;
12. Branch BISTRITA - established on 09 December 2005, registered with the Trade Registry under no. J06 / 1015/2005;
13. Branch SIBIU - established on 06 December 2005, registered with the Trade Registry under no. J32 / 1776/2005;
14. Branch PIATRA NEAMT - established on 20 February 2006, registered with the Trade Registry under no. J27 / 230/2006;
15. Branch IASI - established on 29 March 2006, registered with the Trade Register under no. J22 / 786/2006;
16. Branch BERCENI - established on 11 April 2006, registered with the Trade Register under no. J40 / 6091/2006;
17. Branch RAHOVA - established on 12 May 2006, registered with the Trade Register under no. J40 / 7744/2006;
18. Branch VOLUNTARI - established on 12 June 2008, registered with the Trade Register under no. J23 / 1715/2008;
19. Branch NERVA TRAIAN - established on 29 May 2008, registered with the Trade Register under no. J2008009450406;
20. Branch CRAIOVA - established on 8 July 2008, registered with the Trade Register under no. J16 / 1345/2008;
21. Branch BRASOV - established on 11 July 2008, registered with the Trade Register under no. J08 / 1906/2008;
22. Branch DECEBAL - established on 03 November 2010, with registered office in Bucharest. Blvd. Decebal 7, building S 12, ground floor. district 3;
23. Branch ION Mihalache. J40 / 4759/2011, Municipality of Bucharest. 35-37 Blvd. Ion Mihalache. district 1
24. Branch Cluj-Napoca. J12/1423/26,05,2011, Municipality of Cluj-Napoca. 10 Eroilor Blvd., County Cluj;
25. Branch AFUMATI. J23/1866/14,07,2011, commune of Afumati. Street Fabricii. no. 1, T111, P425, premises H9-M1,, County Ilfov
26. Branch Timisoara. J35 / 1847 / 10,08,2011, Timisoara. 19 suite Street Doinei. County Timis
27. Branch Camil Ressu - J40 / 6787 / 13,06,2012, Bucharest. district 3, Blvd. Camil Ressu 68, building 1B. plot 5
28. Branch Bacau - J2012000782040, Bacau. 4 Road Marasesti. entrance D. ground floor. County Bacau
29. Branch Targu Mures - J26 / 259 / 16,03,2012, Targu Mures. Square Trandafirilor 6-8, County Mures
30. Branch Braila - J9 / 722 / 27,11,2013. 51 Calea Calarasilor. Plot 1. block 104. ground floor. Municipality Braila. Braila County
31. Branch Drumul Taberei - J40 / 13978 / 12,11,2013. Street Drumul Taberei 90. building C8. ground floor. sector 6. Bucharest
32. Branch Fundeni - J23 / 2955 / 27,09,2013. Dobroiesti. Str. Dragonul Roșu 1-10. shopping center Dragonul Roșu Megashop. floor 1. unit R1. Ilfov County;
33. Branch Galați - J17 / 950 / 01,08,2013. Municipality Galați. Domneasca Street no. 17. Building B. ground floor. Galați County;
34. Branch Regina Elisabeta - J40 / 9559 / 30,07,2013. Bucharest. Blvd. Regina Elisabeta 63. ground floor. sector 5;
35. Branch Colentina - J40 / 12992 / 21,10,2013. 274 Colentina Ave.. ground floor. rooms 3 and 9. sector 2. Bucharest
36. Branch 13 Septembrie-J40 / 11788/2014. Calea 13 Septembrie. no. 114. block 56. staircase 1. Bucharest
37. Branch Suceava- J33 / 863/2014. Stephen the Great Street. no. 17. ground floor + basement. rooms 14. 15. 16 - 17. entrance A-B. Suceava
38. Branch Chitila -J40 / 12134/2014. Chitilei Road no. 101. Bucharest
39. Branch Podu Roș Iași: J22 / 1824/2015. Municipality Iași. Saint Lazar Street (former 7 November). no. 49. block A1-3. ground floor. Iași. Iași County
40. Branch PANTELIMON EAST. J40 / 13982/2015. Pantelimon Road no.286. block.41. ground floor. sector 2. Bucharest;
41. Branch MAGHERU - J40 / 626 / 21,01,2015. Blvd. Gen. Gh. Magheru No.1-3. Ground floor. Commercial space "I". Sector 1. Bucharest;
42. Branch MARASTI CLUJ-NAPOCA - J12 / 798/2015. 21 December 1989 Boulevard. No. 148. Ground floor. Block B1. Apt. 114. Cluj. Cluj County;
43. Branch ARAD - J2 / 636/2016. Blvd. Revolutiei. no. 89. building A. ground floor. apt.1- B. Arad County;
44. Branch BARNUTIU TIMISOARA- J35 / 1358/2016. Simion Barnutiu Street. no. 73-77. block 75. Timis County;
45. Branch DOROBANTI - J40 / 15998/2016. Calea Dorobanti. no. 111-113. block 9B. Municipality Bucharest. Sector 1;

46. Branch CAPITOL CONSTANTA- J2016000205134. Tomis Blvd. 132. block LE1- LE2. Constanța. Constanța County
47. Branch EROII REVOLUTIEI - J40 / 3024/2017. unique registration number 37176864. Giurgiului Road. no 23. sector 4. Bucharest;
48. Branch CRANGASI - J40 / 1473/2017. unique registration number 37032885. Calea Crangasi no. 21. block 12. ground floor. commercial spaces no. 3 and 4. sector 6. Bucharest;
49. Branch APUSULUI - J2017013596402. unique registration number 38040444. Iuliu Maniu Blvd. no 73. ground floor. commercial space no. 4. block C3. sector 6. Bucharest.
50. Branch CLUJ MĂNĂȘTUR - registered with the Trade Register under no. J12 / 1508 / 04,04,2019. unique register number 40919144. 64-66 Calea Mănăstur. unit no. 1 Cluj-Napoca. Cluj.
51. Branch FOCȘANI - registered with the Trade Register under no. J39 / 387 / 20,02,2019. unique register number 40668697. Cuza Vodă Street 9A. commercial unit no. 1. Focșani. Vrancea. which has been operating since 20,02,2019.
52. Branch BASARABIA - registered with the Trade Register under no. J40 / 9615 / 23,07,2019. unique registration number 41428145. 1 Intrarea Sectorului. commercial unit no. 13. ground floor. sector 3. Bucharest. which has been operating since 23,07,2019.
53. Branch SLOBOZIA - registered with the Trade Register under no. J21 / 721 / 11,11,2019. unique register number 41884370. 17 Matei Basarab Blvd. Slobozia. Slobozia. which has been operating since 11,11,2019.
54. Branch ALEXANDRIA - registered with the Trade Register under no. J34 / 113/2020. unique register number 42311287. Bucharest Street. Block T1. ground floor. Alexandria. Teleorman. has been operating since 24,02,2020
55. Branch Pipera - registered with the Trade Register under no. J40/185/06,01,2023, unique register number 47410422, Bucharest Sector 2, Șoseaua Fabrica de Glucoză nr 6-8, Ground floor, Section G7, has been operating since 06,01,2023
56. Branch Brasov Astra - registered with the Trade Register under no. J8/2541/11,09,2023, unique register number 48761596, Municipality Brasov, Calea București no. 102, Brasov County, has been operating since 11,09,2023
57. Branch Constanța Ferdinand - registered with the Trade Register under no. J13/3523/24,10,2023, sole registration number 49000470, Constanța Municipality, Ferdinand Boulevard no. 19, Constanța County, has been operating starting from 25,10,2023
58. Iași Păcurari Branch, - registered with the Trade Register under no. J22/1166/2024, sole registration number 49842680, Păcurari Road, no. 61, Iași, Iași County, has been operating since 03,04,2024
59. Popești-Leordeni Branch - registered with the Trade Register under no. J23/1866/2011, sole registration number 28863559, Olteniței Road no. 13 Bis, Bl. G1-2, Commercial space no. 2, Popești-Leordeni, Ilfov County, has been operating since 20,05,2024

Chairman of the Board of Directors
Radu Grațian Ghețea



Vice-Chairman of the Board of Directors
Eugen Goga



SUSTAINABILITY STATEMENT 2025

LIBRA INTERNET BANK S.A.

Contents

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1. GENERAL INFORMATION ON THE SUSTAINABILITY STATEMENT

The implementation of the European Corporate Sustainability Reporting Directive (CSRD) represents a significant milestone for Libra Internet Bank. This marks an opportunity for Libra Internet Bank to reinforce our commitment to transparency, responsibility, and sustainable development. By aligning our sustainability reporting practices with the European Sustainability Reporting Standards (ESRS), Libra Internet Bank takes an essential step toward enhancing the clarity and quality of environmental, social, and governance (ESG) disclosures for all stakeholders.

The CSRD establishes mandatory reporting standards (ESRS), which define specific disclosure requirements and ensure the structured presentation of ESG information. In its Sustainability Statement, Libra Internet Bank provides comprehensive insights into various aspects of our operations. This includes our strategy, business model, governance, value chain, and stakeholder engagement practices, fulfilling the transparency and reporting criteria established by ESRS 2. Furthermore, this statement addresses the sustainability topics identified as material for Libra Internet Bank, reflecting commitment to continuous improvement and stakeholder accountability.

The Sustainability Statement of Libra Internet Bank for the year ended December 31, 2025, was prepared in accordance with the provisions of Order no. 1/2024 of the National Bank of Romania, which amends Order no. 27/2010 approving the accounting regulations in line with the International Financial Reporting Standards, for the implementation of Article 29a of Directive 2013/34/EU, as amended by Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, and amending Regulation (EU) No. 537/2014, Directive 2004/109/EC, Directive 2006/43/EC, and Directive 2013/34/EU. In accordance with the requirements of ESRS 1, the Bank has also included the information required under Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (the EU Taxonomy Regulation and accompanying delegated acts), presented as separately identifiable sections within this Sustainability Statement.

1.1. Basis of Preparation

1.1.1. General Basis for the Preparation of the Sustainability Statement

The Sustainability Statement for the year 2025 has been prepared on an individual basis, as there are no consolidated entities within Libra Internet Bank's scope (*ESRS 2-BP-1.5a*). Therefore, disclosures related to the alignment of the consolidation scope with the financial statements (*ESRS 2-BP-1.5b. i*) and the indication of subsidiary undertakings exempted from individual or consolidated sustainability reporting (*ESRS 2-BP-1.5b. ii*) are not applicable.

To ensure comprehensive sustainability reporting, Libra Internet Bank has considered its upstream and downstream value chains in identifying impacts, risks, and opportunities (*ESRS 2-BP-1.5c*). Upstream activities encompass relationships with suppliers of goods and services, including financial and capital providers. Downstream activities primarily relate to the provision of financial products and services to clients, including loans, investments, and asset management.

Libra Internet Bank has not exercised the option to omit any specific information related to intellectual property, know-how, or innovation outcomes (*ESRS 2-BP-1.5d*). Furthermore, Libra Internet Bank has not utilized the exemption provided by articles 19a (3) and 29a (3) of Directive 2013/34/EU regarding disclosures of pending developments or matters under negotiation (*ESRS 2-BP-1.5e*).

This Sustainability Statement covers information pertaining to the reporting period from January 1, 2025, through December 31, 2025.

1.1.2. Disclosures Related to Specific Circumstances

BP-2

For the preparation of the 2025 Sustainability Statement, the Bank has adopted the following definitions of time horizons as specified in ESRS 1, section 6.4 (*ESRS 2-BP-2.9a*):

- ⇒ Short-term time horizon: Defined as the reporting period of the financial statements.
- ⇒ Medium-term time horizon: The period from the end of the short-term reporting period up to five years.
- ⇒ Long-term time horizon: More than five years.

These time horizons have also been applied to the assessment of material impacts, risks, and opportunities included in the Sustainability Statement.

The rationale behind the application of these definitions is as follows (*ESRS 2-BP-2.9b*):

- ⇒ The short-term time horizon aligns with annual financial reporting, ensuring consistency with the Bank's short-term operational and financial decision-making processes.
- ⇒ The medium-term time horizon aligns with Libra Internet Bank's General Business Strategy, which outlines a three-year strategic plan. This timeframe allows for prudent risk management and ensures that the maximum extended period for which substantial data is available or reasonably foreseeable is considered.
- ⇒ The long-term time horizon accounts for broader strategic, sustainability, and investment decisions, supporting the Bank's long-term vision and sustainable growth objectives.

The Sustainability Statement presents comparative information from the previous reporting period where such information is available, as indicated in the various chapters of the sustainability statement. The statement does not include disclosures required by other sustainability reporting standards.

In the Bank's sustainability reporting, material metrics are assessed and disclosed, including cases where direct data collection is not feasible, requiring the use of estimates derived from indirect sources (*ESRS 2-BP-2.10*). One such metric is Scope 3 GHG emissions, encompassing both upstream and downstream emissions (*ESRS 2-BP-2.10a*). Due to the limited availability of precise data from certain value chain partners, the Bank relies on sector-specific methodologies to estimate these emissions.

- ⇒ Upstream emissions: Estimated using sector-average emission factors provided by the Greenhouse Gas Protocol for the oil and gas industry, multiplied by the volume of raw materials procured and processed (*ESRS 2-BP-2.10b*).
- ⇒ Downstream emissions: Calculated based on average emissions data from the International Energy Agency (IEA) for end-use combustion of petroleum products, adjusted for the total volume of products sold and their typical usage patterns (*ESRS 2-BP-2.10b*).

Given the nature of these estimations, the accuracy of the reported values varies (*ESRS 2-BP-2.10c*).

- ⇒ Upstream Emissions: The estimated accuracy is moderate, with a potential deviation of $\pm 15\%$. This is attributed to variability in suppliers' operations and efficiency, which may not be fully captured by sector averages.
- ⇒ Downstream Emissions: The estimated accuracy is moderate, with a potential deviation of $\pm 35\%$. The reliance on average combustion emissions data means that specific usage conditions of our products by different customers may not be fully represented.

To improve the accuracy of Scope 3 GHG emissions reporting in future disclosures (*ESRS 2-BP-2.10d*), Libra Internet Bank plans to:

- ⇒ Expand data collection for energy efficiency certificates to enhance the calculation of downstream emissions.
- ⇒ Utilize publicly available sustainability reports from clients as more entities undertake reporting responsibilities, leading to more accurate and data-driven estimations.
- ⇒ By continuously refining the estimation process and leveraging more precise data sources, enhance transparency and reliability in its sustainability reporting.

Libra Internet Bank acknowledges the challenges associated with measuring climate-related metrics, especially Scope 3 greenhouse gas (GHG) emissions. These uncertainties arise from factors such as data availability, differences in calculation methods, and the need for estimation assumptions. (*ESRS 2-BP-2.11a*).

Similar to the approach used for eligibility and alignment reporting under the EU Taxonomy, the Bank's evaluation is based on eligibility and alignment information provided by clients in their own sustainability reporting in accordance with applicable EU Taxonomy requirements. Under the current regulatory framework, loans granted to small and medium-sized enterprises (SMEs) that are not required to report under CSRD, will be included only in the denominator of the Green Asset Ratio (GAR), without being counted in the numerator as sustainable activities.

The forward-looking information presented in this report may be subject to inherent uncertainty due to external factors, market conditions, and regulatory developments (*ESRS 2-BP-2.12*).

This sustainability statement does not include additional sustainability reporting standards or frameworks beyond those prescribed (*ESRS 2-BP-2.15*).

1.2 Governance

1.2.1. The role of the administrative, management and supervisory bodies

Libra Internet Bank operates under a unitary governance system, managed by a Board of Administration composed of 7 members, 4 of which are non-executive (two of them being independent) and 3 executive members. The executive management of the Bank is ensured by the Steering Committee, which consists of 4 members (*ESRS 2-GOV-1.21a*). The full list of administrators, including executive and non-executive members, is found in the Administrator's Report, section 3.4.

The Board of Directors is responsible for overseeing the Bank's strategic direction, ensuring compliance with regulatory requirements, and managing risk. The Steering Committee manages the day-to-day operations and implementation of strategic decisions.

Libra Internet Bank employees are represented through a sector-wide collective bargaining contract, ensuring that their rights and interests are safeguarded. No members of the Board of Administration directly represent employees or other workers (*ESRS 2-GOV-1.21b*).

All members of the Board of Administration and Steering Committee have experience relevant to the Bank's operations, covering all products, business lines, and geographic locations in which Libra Internet Bank operates.

To ensure informed decision-making, the Bank also consults Division and Department Heads with specialized expertise in various Impact, Risk, and Opportunity (IRO) areas, including:

- ⇒ Sales
- ⇒ Human Resources
- ⇒ Administrative (Health, Hygiene, and Safety)
- ⇒ Risk
- ⇒ Compliance
- ⇒ Marketing
- ⇒ Legal (*ESRS 2-GOV-1.21c*)

The composition of the Board of Administration in terms of gender representation is as follows:

- ⇒ 28.57% female
- ⇒ 71.42% male

No additional diversity criteria have been applied in the composition of the Board (*ESRS 2-GOV-1.21d*).

The percentage of independent members within the Board of Administration is 28.57% (*ESRS 2-GOV-1.21e*).

Members consulted in the Double Materiality Assessment (DMA) process include:

- ⇒ Sales Representatives (Portfolio IROs):
 - Head of European Funds Division
 - Head of Large Corporate Division
 - Area Manager, Corporate Division
- ⇒ Risk and Underwriting (Portfolio IROs):
 - Team Coordinator within the Risk Management Division
 - Head of Division for Liberal Professions, Agriculture, and SMEs Analysis
 - Head of Corporate Credit Analysis Department
 - Head of Risk Management Division
- ⇒ Various Divisions (Own Operations Aspects):
 - Head of Accounting and Financial Division
 - Head of Administrative and Investment Division
 - Head of Procurement Department
 - Head of Payroll Department

Multiple Divisions (Consumers, Privacy, and Affected Communities):

- Head of Compliance Department (Methodology and Control)
- Head of Compliance Department (KYC/AML)
- Data Protection Officer
- Public Relations Specialist, Marketing Division

The Bank's Chief Risk Officer (CRO) oversaw the DMA process. The final DMA results were presented to the Steering Committee for approval. The Sustainability Report was also presented to the Steering Committee before final approval from the Board of Administration (*ESRS 2-GOV-1.22a*).

Libra Internet Bank has established the Sustainability Team (a multidisciplinary team composed of representatives from several divisions in areas of sales, risk management, legal, marketing and human resources), which, after the first DMA 2024 exercise, defined the internal double materiality assessment process, through which internal owners were assigned for each IRO. Furthermore, this Team gradually incorporates the Bank's ESG requirements and objectives into the business model and internal processes. However, the general expertise, roles, and responsibilities established by the Bank's governance framework provided guidance in identifying and analyzing material IROs (*ESRS 2-GOV-1.22b*).

Management's Role in Governance (*ESRS 2-GOV-1.22c*)

i. Delegation of oversight responsibilities:

The Bank has formalized a process flow concerning the evaluation of the double materiality assessment with the following aspects:

- The Bank's Chief Risk Officer (CRO) supervises the DMA process.
- The Sustainability Team coordinates the assessment and consults stakeholders.
- The final DMA report is submitted for approval to the Steering Committee.
- The final Sustainability Statement is approved by both the Steering Committee and the Board of Administration (*ESRS 2-GOV-1. 22c.i*).

ii. Reporting lines to governance bodies:

Standard reporting lines are clearly described in each procedure relevant to the double materiality assessment process, outlining the specific roles and responsibilities to ensure accountability and streamline the assessment process, facilitating effective decision-making and accurate reporting (*ESRS 2-GOV-1. 22c.ii*).

iii. Dedicated controls and procedures for IRO management:

For lending operations, a dedicated control for traditional risks exists within the Bank's Environmental & Social (E&S) Policy and Procedure. This ensures that all loan applications undergo proper due diligence as part of the approval process and are assigned an E&S risk rating. This rating is incorporated into the overall risk assessment and influences the loan approval decision by the relevant committee.

Other impacts, risks and opportunities stemming from the DMA currently do not have explicit dedicated controls. However, the Bank's existing risk monitoring systems, which cover traditional risk categories, provide partial coverage of IRO controls (*ESRS 2-GOV-1.22c.iii*).

Oversight of Targets for Impacts, Risks, and Opportunities (*ESRS 2-GOV-1.22d*)

Following the completion of the 2024 Sustainability Report and in accordance with the legal requirements, the Steering Committee has decided to develop the Prudential Transition Plan, following which it will evaluate and propose appropriate quantitative targets for approval by the Board of Administration (*ESRS 2-GOV-1.22d*). At this moment, the Bank has not set any targets.

Availability of appropriate skills and expertise to oversee sustainability matters

Libra Internet Bank recognizes the importance of integrating sustainability expertise within its governance structure to enhance decision-making and risk management. The Bank's governance bodies possess sustainability-related expertise through certified training programs and external advisory support, ensuring that sustainability considerations are embedded in strategic decision-making (*ESRS 2-GOV-1.23a*).

To strengthen its internal knowledge base, several key governance members have obtained recognized ESG-related certifications, demonstrating their commitment to responsible banking and sustainable finance:

- ⇒ Member of the Steering Committee and the Board of Administration – Certified ESG Analyst
- ⇒ Head of the Credit Risk Management Department – Certified ESG Analyst
- ⇒ Head of the European Funds Division – Green Financing Certified Professional (Chartered Banker Institute)
- ⇒ Team Coordinator – Risk Management Division – Various ESG-related training programs

Beyond internal expertise, Libra Internet Bank also employs external advisors to ensure its sustainability strategy remains aligned with best practices and evolving regulatory expectations. The Bank collaborates with third-party consultants, including EY, to support the development process of the Prudential Transition Plan, the calculation of the carbon footprint associated with the loan portfolio, and alignment with the EU Taxonomy. This ensures that sustainability risks, opportunities, and impacts are assessed using globally recognized methodologies (*ESRS 2-GOV-1.23a*).

Libra Internet Bank's material Impacts, Risks, and Opportunities (IROs) primarily relate to portfolio impacts and privacy concerns, both of which are classified as downstream risks. Given the complexity and evolving nature of sustainability-related challenges, the Bank leverages the expertise of its governance members, particularly those holding Certified ESG Analyst (CESGA) credentials, to enhance the assessment, monitoring, and strategic integration of sustainability-related financial risks (*ESRS 2-GOV-1.23b*).

The Steering Committee and Board of Directors are actively involved in overseeing sustainability-related matters, ensuring that Libra Internet Bank's governance structure fosters responsible finance practices, regulatory compliance, and long-term value creation for stakeholders.

The administrative, management, and supervisory bodies of Libra Internet Bank play a central role in upholding ethical business practices and ensuring regulatory compliance across all operations. The Board of Administration has ultimate responsibility for the Bank's governance framework, overseeing policies related to ethical conduct, anti-corruption measures, and regulatory compliance. It regularly reviews and approves the Bank's business conduct strategy to ensure alignment with legal obligations, international best practices, and stakeholder expectations.

The Steering Committee is tasked with implementing business conduct policies and embedding ethical considerations into strategic and operational decision-making. It is also responsible for overseeing the compliance function, which ensures adherence to key regulatory and ethical frameworks, including:

- ⇒ AML CFT Policy Management of International Sanctions policy
- ⇒ Anti-bribery and corruption (ABC) controls
- ⇒ Customer due diligence processes
- ⇒ Data privacy regulations

Regular compliance reports, including updates on ethics-related incidents and regulatory adherence, are presented to both the Steering Committee and the Board of Administration. Additionally, the Bank maintains a Whistleblower Policy, which is periodically reviewed and approved to reinforce transparency and accountability, the specifics of which are detailed within the G1 requirement disclosures (*ESRS 2-GOV-1.5a*).

Libra Internet Bank's leadership is equipped with extensive expertise in business ethics, compliance, and corporate governance. Members of the Board of Administration have backgrounds in legal affairs, risk management, and regulatory compliance, having experience in senior positions within financial institutions. This collective experience strengthens the Bank's ability to oversee ethical business conduct, ensuring that compliance policies are effectively implemented and continuously improved (*ESRS 2-GOV-1.5b*).

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

As part of the DMA exercise, the Steering Committee and Board of Administration are informed about material IROs on an annual basis. This ensures continuous oversight and integration of sustainability considerations into strategic decision-making (*ESRS 2-GOV-2.26a*).

The annual DMA process will inform the Bank's strategic outlook across different time horizons:

- ⇒ Short-term: the results will be integrated into the decision-making process for annual budgets.
- ⇒ Medium-term: the results will be considered in the development and approval of the Bank's General Business Strategy.
- ⇒ Long-term: the results will be used in strategic decision-making related to market shifts and potential growth opportunities.

The degree of materiality, macroeconomic context, and evolving regulatory requirements will influence how IROs shape decision-making across these timeframes (*ESRS 2-GOV-2.26b*).

The Board of Administration holds ultimate responsibility for all Bank activities, as outlined in the Organization and Operating Regulation. It addresses all material topics identified through the DMA process.

For Social and Governance topics, many of the Bank's existing indicators and reporting requirements closely align with identified IROs, as detailed in the internal policies and procedures. This existing framework ensures that key sustainability aspects are continuously monitored and managed (*ESRS 2-GOV-2.26c*).

Integration of sustainability-related performance incentive schemes

There are sustainability related aspects, which have been incorporated into the management performance evaluation objectives, alongside the financial results and the traditional risk management indicators (*ESRS 2-GOV-3.29*).

At present, no climate-related considerations are directly factored into remuneration procedures (*ESRS 2-GOV-13*).

1.2.2. Statement on due diligence

The specific due diligence processes for IROs can be found in the Procedure on Double Materiality Assessment. As part of the Bank's commitment to responsible business conduct, a comprehensive due diligence process is embedded for concerns related to traditional financial risks, as well as compliance with all applicable national and EU legislation. This process is integrated across governance, strategy, and operations, ensuring that potential or actual risks affecting the Bank's strategy and adherence to its core values, as defined in the General Business Strategy, are systematically identified, addressed, and monitored (*ESRS 2-GOV-4.30; 32*).

Core Elements of Due Diligence

- a) **Embedding due diligence in governance, strategy, and business model:** Due diligence is integrated into the Bank's corporate governance framework through policies approved by the Steering Committee and the Board of Administration, including the Environmental & Social (E&S) Policy, Banking Code of Ethics, and Anti-Harassment Policy.
- b) **Engaging with affected stakeholders in all key steps of the due diligence:** The Bank maintains continuous engagement with stakeholders, including clients, investors, employees, regulators, and professional organizations, including the recurring consultation within the DMA process.

Client feedback is received via complaints and dedicated feedback channels, also accessible to non-clients.

Regulators conduct annual supervisory reviews and issue yearly supervisory reports, in addition to numerous ad hoc requests addressed by the Bank. The Bank also actively participates in Romanian Banking Association (RBA) committees that discuss key regulatory and business model issues.

- c) **Identifying and assessing adverse impacts:** Due diligence is performed to identify and assess actual and potential adverse impacts, especially in the downstream value chain, with a focus on lending operations. The Environmental and Social Management System (ESMS) includes sector-specific screening criteria, and ESG risk assessment tools used during the credit approval process.

- d) **Taking actions to address those adverse impacts:** When adverse impacts are identified, the Bank undertakes appropriate actions, including enhanced due diligence and engagement with clients to develop Environmental and Social Action Plans (ESAPs) as part of the ESMS. The Bank also enforces a lending exclusion list to mitigate and prevent sustainability-related impacts.
- e) **Tracking the effectiveness of these efforts and communicating:** Targets and specific KPIs for due diligence on sustainability-linked matters are reviewed and considered by the Steering Committee and Board of Administration following the conclusion of the DMA process.

Due Diligence Process Elements	Relevant Section of the Sustainability Statement
a) Embedding the due diligence process into governance, strategy, and business model	1.2.3 The Role of the Administrative, Management, and Supervisory Bodies 1.2.2 Stakeholders' Interests and Opinions
b) Collaboration with affected stakeholders at all main stages of the due diligence process	1.2.3 The Role of the Administrative, Management, and Supervisory Bodies 1.2.2 Stakeholders' Interests and Opinions
c) Identification and assessment of adverse impacts	1.2.3 The Role of the Administrative, Management, and Supervisory Bodies
d) Taking action to address these adverse impacts	1.3.3 Material Impacts, Risks, and Opportunities and Their Interaction with Strategy and Business Model 1.4.1 Overview of the Double Materiality Assessment Process 2.1.2.3 Actions and Resources Related to Climate Change Policies 2.2.2.3 Actions and Resources Related to Water and Marine Resources
e) Tracking the effectiveness of these efforts and communicating	3.1.2.2 Collaboration Processes with Own Workforce and Worker Representatives on Impact 3.1.2.3 Processes for Remedying Adverse Impacts and Channels for the Own Workforce 3.1.2.4 Actions Regarding Significant Impacts on the Own Workforce, Approaches to Managing Significant Risks, and Tracking Significant Opportunities Related to the Own Workforce and the Effectiveness of These Actions 3.2.2.2 Interaction Processes with Consumers and End Users Regarding Impacts 3.2.2.3 Processes for Remedying Adverse Impacts and Channels for Consumers and End Users to Raise Concerns 3.2.2.4 Actions Regarding Significant Impacts on Consumers and End Users, Approaches to Managing Significant Risks, Tracking Significant Opportunities Related to Consumers and End Users, and the Effectiveness of These Actions

1.2.3. Risk management and internal controls over sustainability reporting

Libra Internet Bank integrates the monitoring of sustainability risks into its internal DMA processes, as well as into the lending process and operational risks reporting workflows. The existing governance structures and internal controls are currently used to support the preparation of the sustainability statement. Responsibilities for sustainability reporting are integrated within existing internal functions, including those involved in ESG implementation (*ESRS 2-GOV-5.36a*).

Libra Internet Bank's management and supervisory bodies play a central role in promoting responsible business conduct across the organization. The Board of Administration holds ultimate responsibility for the governance framework, including the Code of Conduct, anti-corruption measures, and ethical compliance standards. It reviews and approves the Bank's business conduct policies to ensure alignment with applicable laws, international standards, and stakeholder expectations.

The Steering Committee is tasked with the operational implementation of these policies, ensuring that ethical principles are embedded in decision-making processes and day-to-day activities. The Committee also oversees the Compliance function, which monitors the Bank's adherence to key policies including anti-money laundering (AML), anti-bribery and corruption, customer due diligence, and data privacy. Regular reports on compliance indicators, including incidents and ethical concerns, are submitted to both the Steering Committee and the Board of Administration.

A dedicated Whistleblower Policy is also in place, subject to regular review and governance-level approval, to ensure safe and confidential channels for reporting misconduct (*ESRS 2-GOV-1.5a*).

Libra Internet Bank's overall risk profile is governed by its Risk Strategy, which applies a weighted approach to different categories of risk based on their potential severity and prioritization within the Bank's broader risk framework. This methodology extends to sustainability-related risks, especially those concerning the accuracy, transparency, and compliance of sustainability disclosures.

In the context of the Bank's Double Materiality Assessment (DMA) exercise, an integrated cross-functional approach was adopted to identify, assess, and prioritize risks affecting the reliability and completeness of sustainability-related information. This process involved close collaboration across internal structures such as Sustainability, Compliance, Risk Management, Finance, Human Resources, and IT.

The following components were central to the Bank's risk assessment process:

- ⇒ Stakeholder engagement and materiality analysis aligned with ESRS requirements were conducted to determine which sustainability matters present the highest relevance based on impacts, risks, and opportunities.
- ⇒ A risk scoring methodology was applied to assess the likelihood, scale, and scope of impacts (and irremediability for negative impacts), and likelihood and magnitude of risks and opportunities (IROs).

The Bank uses existing risk governance structures to support sustainability-related assessments. These include internal policies and procedures that already address compliance, operational risk, and strategic oversight.

Furthermore, the assessment process is guided by regulatory compliance standards, especially those outlined in CSRD and ESRS, with special attention to:

- ⇒ Consistency and traceability of data used in sustainability disclosures.
- ⇒ Reliability of internal and third-party information sources.
- ⇒ Coordination across departments responsible for data collection and validation.

Additionally, the Bank benefits from a governance structure with deep expertise in ethics, compliance, audits relationship with regulatory authorities. Several members of the Board of Administration have held senior roles in the financial and regulatory sectors, bringing robust legal and compliance knowledge that supports the effective oversight of sustainability-related matters. This collective expertise reinforces the integration of ethical conduct and regulatory compliance into the Bank's sustainability reporting processes (*ESRS 2-GOV-5.36b*).

As part of the sustainability reporting process, Libra Bank has identified several key risks that may affect the accuracy, integrity, or regulatory alignment of its disclosures. One such risk is data quality, stemming from inconsistent or incomplete data collection across internal systems or third-party sources. To mitigate this, the Bank employs standardized data collection templates, implements automated validation controls, and performs periodic reconciliations to ensure consistency and accuracy.

A second major concern is regulatory compliance risk, related to potential non-compliance with CSRD, ESRS, or sector-specific disclosure obligations. To address this, the Bank conducts ongoing monitoring of regulatory developments, schedules periodic legal reviews, and provides dedicated training to the reporting teams to ensure compliance readiness.

In terms of reputation, the Bank acknowledges the potential for greenwashing or reputational risk, which may arise from inaccurate or misleading sustainability claims. This is mitigated through an internal review process led by the Sustainability Team, with final validation and approval provided by the Steering Committee and Board of Administration.

Another challenge is third-party data risk, particularly concerning the estimation of GHG emissions in the absence of direct client data. In such cases, the Bank engages with specialized external consultants to apply recognized industry standards and ensure reliable proxy estimations.

Lastly, IT and system risks, such as failures in reporting infrastructure, could lead to inaccurate disclosures or system downtime. These are addressed through regular system audits, the implementation of robust cybersecurity protocols, and a comprehensive IT disaster recovery framework (*ESRS 2-GOV-5.36c*).

Findings and recommendations derived from the Bank's sustainability risk assessments are reviewed by the management bodies and based on their decisions, are progressively integrated into the Bank's broader risk management framework. This integration ensures that sustainability reporting is not treated as a standalone process, but rather embedded into existing internal functions, particularly those related to compliance, risk oversight, and strategic planning (*ESRS 2-GOV-5.36d*).

The results of the sustainability reporting process, including risk-related findings, are formally presented to the Steering Committee and the Board of Administration on an annual basis, as part of the Double Materiality Assessment (DMA) exercise. Moving forward, as the Bank develops specific sustainability-related risk indicators, periodic reporting on these metrics will be implemented to ensure ongoing governance-level oversight and responsiveness (*ESRS 2-GOV-5.36e*).

1.3 Strategy

1.3.1. Strategy, business model, and value chain

Libra Internet Bank is a credit institution active on the Romanian banking market since 1996. With a modern, digital, and sustainable approach, Libra Internet Bank has consolidated its position as a trusted financial partner for individual clients, liberal professionals, and SMEs. The Bank promotes innovation in banking services; thus, it launched products dedicated to the e-commerce segment and fully digital solutions for account opening and loan access.

In 2025, Libra Internet Bank continued to expand its portfolio of sustainable products by promoting green financing solutions, including loans for energy efficiency in real estate and funding guaranteed by the European Investment Fund (EIF), under programs dedicated to competitiveness, sustainability, and microfinance.

Libra Internet Bank operates exclusively in Romania, through a network of physical banking units and digital channels, employing 1,386 employees located in Romania.

Libra Bank provides a comprehensive range of financial products and services to individuals, professionals, and corporate clients. The main categories include:

- ⇒ **Corporate and Retail Banking Services:** current accounts, deposits, lending (including working capital and investment loans), payment services, and card issuance.
- ⇒ **Sustainability-Linked Finance Products:** including dedicated durable real estate financing.
- ⇒ **Digital Banking Solutions:** designed to promote financial inclusion and digital accessibility while reducing operational emissions through a low-carbon digital infrastructure.

The Bank has continued to promote loans under the guaranteed agreements signed with the European Investment Fund (EIF), covering competitiveness, sustainability, and microfinance objectives. This supports access to finance for underserved SMEs and promotes alignment with EU sustainability goals (*ESRS 2-SBM-1.40a i*).

Libra Bank operates exclusively within Romania. It serves a diversified customer base across multiple business segments, including:

- ⇒ **Large Corporate Clients:** Enterprises with significant turnover and complex financing needs.
- ⇒ **Corporate Clients:** Medium-sized businesses with standard commercial operations.
- ⇒ **SMEs and Microfinance Clients:** Small businesses, particularly those with turnover below 5 million RON, supported by dedicated programs including EIF-backed lending.
- ⇒ **Agribusiness Entities:** Clients operating in agriculture and rural development.
- ⇒ **Real Estate Developers:** Entities seeking financing for residential and commercial development projects.
- ⇒ **Liberal Professionals:** Such as lawyers, doctors, and architects.
- ⇒ **Retail Customers:** Individual clients and households accessing everyday banking and consumer credit.
- ⇒ **eBusiness Clients:** Businesses active in the digital and e-commerce sector.
- ⇒ **Digital Clients:** Individuals interacting exclusively through online banking platforms.

There were no significant changes to the customer groups or geographic footprint during the reporting year (*ESRS 2-SBM-1.40a ii*). As of the end of 2025, the Bank employed 1,386 employees, all based in Romania. The Bank does not operate in other geographical areas (*ESRS 2-SBM-1.40a iii*).

Segment Presentation (Loans and Advances to Customers at Amortized Cost) as of December 31, 2025

Loans and Advances to Customers at Amortized Cost – Gross Carrying Amount*		
	2025 (RON)	2024 (RON)
Agriculture	1,505,606,003	1,375,572,630
Real Estate	2,225,888,089	1,649,993,070
Enterprises	2,295,524,226	1,913,562,432
Administrative-Territorial Units (ATUs)	782,041,156	573,240,794
Professionals	1,132,221,296	1,143,002,928
Individuals	752,285,912	793,844,146
Total	8,693,566,682	7,449,216,001
Impairment Adjustment	-294,987,277	-252,714,120
Carrying Amount	8,398,579,405	7,196,501,880

*According to Note 4(a)(i) of the individual and separate financial statements as of 31 December 2025 and 31 December 2024

The Bank does not offer any material products or services that are banned in any market in which it operates (ESRS 2-SBM-1.40a iv).

As part of the Bank's commitment to transparency and responsible lending, Libra Internet Bank discloses its exposures to sectors that may pose elevated sustainability and reputational risks, as defined under ESRS 2-SBM-1.40d. These exposures are assessed based on NACE classification codes and reflect the bank's total loans and advances as of the reporting period ending 31 December 2025.

Libra Internet Bank maintains a minimal exposure to the fossil fuel sector. Financed exposures associated with NACE codes related to fossil fuel extraction, processing, and distribution—specifically 0910, 1920, 2014, 3521, 3522, 3523, 3540, 4671, 4681, 0610, and 0620—collectively represent 0.099% of the Bank's total loans and advances. Thus, the Bank has limited involvement in carbon-intensive activities, in line with its long-term goal of aligning its portfolio with a low-carbon economy (ESRS 2-SBM-1.40d i).

The Bank's exposure to chemical production activities falling under Division 20.2 of Annex I to Regulation (EC) No 1893/2006—specifically NACE code 2020—amounts to 0.001% of total loans and advances, which indicates that Libra Internet Bank's lending strategy is not significantly oriented towards sectors associated with elevated environmental and safety risks (ESRS 2-SBM-1.40d ii).

There are no financed exposures to any controversial weapons activities, including anti-personnel mines, cluster munitions, chemical weapons, or biological weapons. This conclusion is based on a review of exposures to NACE codes 2530, 2540, 2051, 2059, 2561, 2571, 2910, 3030, 3031, 3032, and 3040, which are commonly associated with such activities (ESRS 2-SBM-1.40d iii).

Libra Internet Bank does not maintain any exposure to the cultivation or production of tobacco, as defined by NACE code 1200, (ESRS 2-SBM-1.40d iv).

In addition to loan portfolio exposures, the Bank has also analyzed the overall revenues from clients in sensitive sectors like fossil fuel and chemical production i.e., activities fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006 for the full calendar year 2025, covering all revenue sources, including from clients who concluded their relationship with the Bank during the year. Based on this comprehensive review, net revenues derived from these clients amounted to 0.75% of the Bank's total net profit for 2024. Moreover there were no revenues in the reporting period from clients in other sensitive sectors, namely controversial weapons and cultivation and production of tobacco. (ESRS 2-SBM-1.40d).

Currently, Libra Internet Bank has not set explicit sustainability-related goals segmented by product groups, customer categories, or geographies. However, the Bank has undertaken preparatory measures—such as executing the Double Materiality Assessment (DMA) and integrating ESG risk into its lending process. (ESRS 2-SBM-1.40e).

As no formal sustainability-related goals have been set (as disclosed above), Libra Internet Bank has not yet assessed the alignment of its products, services, or markets with such goals (*ESRS 2-SBM-1.40f*).

As Libra Internet Bank develops its sustainability approach, it recognizes several materials challenges:

- ⇒ **Data Quality & Availability:** The Bank faces difficulties in gathering consistent ESG-related data, especially from SMEs.
- ⇒ **Capacity Building:** There is a recognized need to strengthen ESG expertise across departments, particularly in risk, credit, and compliance functions.
- ⇒ **Regulatory Complexity:** The Bank must navigate and comply with complex and evolving frameworks (e.g., EU Taxonomy, SFDR), requiring continuous investment in legal and compliance capabilities.

In order to mitigate these challenges, the Bank has adopted the following planned solutions and projects:

- ⇒ **ESG Integration in Risk Management:** The Bank is embedding ESG risk indicators into its existing credit and risk evaluation frameworks, as a response to the outcomes of the initial DMA process. This solution also supports the identification of material IROs.
- ⇒ **Stakeholder Engagement Framework:** Libra Internet Bank is developing structured stakeholder engagement processes, including surveys, workshops, and bilateral consultations. For the current exercise, the engagements were held through direct and indirect consultations. These engagements will help identify and prioritize ESG matters aligned with stakeholder expectations (*ESRS 2-SBM-1.40g*).

Libra Internet Bank operates as a universal commercial bank serving both retail and corporate segments. The Bank's business model is underpinned by three key input categories:

- ⇒ **Financial Capital:** Mobilized through customer deposits, bond issuances, and equity. The Bank adheres to liquidity and capital adequacy regulations to ensure sound capital availability.
- ⇒ **Human Capital:** Over 1,386 employees (2025), located in Romania. Investment in employee development, internal academies, and tailored benefits ensures high retention and professional growth.
- ⇒ **Technology & Infrastructure:** The Bank continuously upgrades its IT systems, digital channels, and cybersecurity protocols to support operational efficiency and customer experience (*ESRS 2-SBM-1.42a*).

The outputs of Libra Internet Bank's core activities consist of a diversified suite of financial products and services tailored to address the needs of a wide range of customer segments. These are designed to promote financial inclusion, support sustainable economic development, and ensure long-term value creation for both internal and external stakeholders.

The key product & service outputs of Libra Internet Bank include:

- ⇒ **For Corporate & SME Banking:**
 - Working capital loans, investment financing
 - Business current accounts and dedicated digital platforms for companies
 - Bancassurance and risk management products
 - EIF-backed loan programs for sustainability, competitiveness, and microfinance
 - Sustainable lending solutions for energy-efficient real estate
 - Guarantee programs signed at the end of 2025 with IDB (Investment & Development Bank) and with EBRD, which will be implemented in 2026

⇒ For Retail Banking:

- Current and savings accounts
- Consumer loans and mortgages
- Mobile banking and fully digital onboarding
- Cards and personal finance tools
- Tailored products for professionals and freelancers
- Guarantee programs signed at the end of 2025 with EBRD, which will be implemented in 2026

⇒ For Payments & Transaction Services:

- SEPA and non-SEPA international transfers
- Instant payments and e-commerce integration
- Online payments, bill payment platforms, and POS services for merchants
- RoPay – alternative instant payment service, which significantly simplifies the payment experience for both clients and merchants, through the higher processing speed and immediate access to funds

The expected and realized outcomes are as follows:

⇒ For Customers:

- Access to Finance: Improved access for underserved groups, such as microenterprises, rural customers, and digital-only users.
- Customer Experience: Increased convenience through digital innovation (e.g., fully remote account opening, instant credit decisions).
- Financial Inclusion: Enhanced support for entrepreneurial activity, especially via EIF-backed programs, supporting underserved demographics like agribusiness and self-employed professionals.

⇒ For Investors:

- Stable Returns: The Bank's disciplined approach to lending, underwriting, and compliance underpins predictable cash flows.
- Risk Mitigation: Conservative risk scoring systems, ESG-based exclusion lists, and early-stage credit risk evaluation reduce exposure to volatile or unsustainable sectors.
- Growth Potential: Sustainable product development (e.g., green loans, ESG-linked facilities) unlocks access to growing market segments aligned with ESG investment trends.

⇒ For Other Stakeholders (Regulators, Communities, Policy Makers):

- Responsible Governance: Ongoing compliance with prudential, data privacy, AML/CFT/international sanctions, and ESG-related regulations.
- Societal Impact: Through lending to sectors like renewable energy, education, and healthcare, the Bank contributes to long-term societal resilience and alignment with national and EU sustainability goals.
- Transparent Conduct: Communication strategies and ethics policies reinforce responsible practices and help manage reputational risks (*ESRS 2-SBM-1.42b*).

Libra Internet Bank operates as a financial intermediary positioned at the nexus of capital provision, risk transformation, and value creation. Its upstream and downstream value chains include a wide range of actors and are structured to support the Bank's operations and strategic goals.

As part of its upstream value chain, Libra Internet Bank benefits from the following key inputs and relationships:

- ⇒ **Technology and Infrastructure Suppliers:** Providers of banking software, core systems, digital identity verification, cybersecurity services, and data hosting platforms.
- ⇒ **Professional and Advisory Services:** Legal advisors, auditors, tax consultants, and sustainability consultants (e.g., EY), supporting internal controls, and regulatory alignment.
- ⇒ **Institutional & Capital Providers:**
 - International/national financial institutions (e.g., EIF, EIB, IDB) that co-finance loan programs or offer risk-sharing guarantees.
 - Bond investors, shareholders, and other capital providers that enable business expansion and innovation.
- ⇒ **Industry & Regulatory Stakeholders:** Romanian Banking Association (RBA), financial regulators (NBR, ASF), and European supervisory institutions that influence policymaking and compliance standards.
- ⇒ **Academic & Training Institutions:** Partners for staff training, ESG education, and recruitment of skilled professionals.
- ⇒ **Rating Agencies:** Provide creditworthiness assessments, influencing cost of capital and investor relations.

In the downstream value chain, Libra Internet Bank has the following key outputs and relationships:

- ⇒ **Customer Segments:**
 - Retail Clients: Individuals and households seeking traditional and digital banking products.
 - SMEs and Corporates: Businesses of all sizes, with particular focus on sustainability-linked financing, energy transition, and agriculture.
 - Public Sector: Local authorities and state agencies accessing payment, deposit, or project financing services.
- ⇒ **Distribution Channels:**
 - Physical Network: Strategically located branches across Romania to serve urban and rural clients.
 - Digital Infrastructure: Online banking portals, mobile apps, and APIs for fintech integration, enabling 24/7 banking, digital onboarding, and remote access to loans.
- ⇒ **End Users and Beneficiaries:**
 - Clients benefit from convenient, affordable, and secure financial services.
 - Broader society benefits from financial inclusion and ethical banking services.
 - Investors benefit from diversified products, governance, transparency, and sound financial performance.

As strategic relationships, Libra Bank maintains close cooperation with:

- ⇒ Regulators (for licensing, risk oversight, sustainability frameworks)
- ⇒ Professional Bodies (e.g., RBA working groups)
- ⇒ Collaborative Programs (e.g., EIF sustainability and competitiveness loan facilities)
- ⇒ Medical, Legal, and Freelancer Associations (specialized product co-creation) (ESRS 2-SBM-1.42c)

1.3.2. Interests and views of stakeholders

Libra Internet Bank considers stakeholder engagement a core element of its sustainability governance, risk management, and strategy formulation processes. The Bank has established a structured, multi-channel approach to identify, engage, and integrate the interests and expectations of its stakeholders into its business conduct and decision-making frameworks.

(i) Identification of Key Stakeholders

The Bank has conducted a stakeholder mapping exercise, which is reviewed annually as part of its double materiality assessment and business strategy review. In the following table, Libra Internet Bank presents its key stakeholder groups, the format and frequency, as well as information regarding the responsibility for organizing stakeholder engagement (*ESRS 2-SBM-2.45a i, ii, iii*):

Key stakeholder group	Frequency and format	Responsibility for stakeholder engagement
Retail and Corporate Customers: Including individuals, professionals, SMEs, and large enterprises	⇒ Regular feedback collected via satisfaction surveys, online forms, complaint channels. ⇒ Direct engagement through customer service teams and dedicated relationship managers.	Managed by Customer Support, Product Development, and Marketing teams.
Employees: Across various divisions and locations, covering both operational and support functions	⇒ Engagement through internal communications, employee forums, and surveys. ⇒ Formal representation through collective bargaining agreements where applicable. ⇒ Anonymous channels such as the Whistleblower Mechanism.	Coordinated by Human Resources and the Ethics & Compliance Officer.
Shareholders: Representing the Bank's equity holders, including institutional and individual investors.	⇒ Engagement through general shareholders' meetings, investor updates, and financial disclosures.	Led by the Corporate Governance Department and Legal Division.
Regulators and Supervisory Authorities: Including the National Bank of Romania (NBR), ASF, and other EU supervisory entities.	⇒ Regular reporting, formal meetings, and ongoing dialogue during audits and supervisory reviews. ⇒ Responses to ad hoc regulatory requests.	Managed by the Risk Administration Division, Compliance, and the Bank's executive bodies
Professional and Industry Organizations: Such as the Romanian Banking Association (RBA) and sector-specific bodies.	⇒ Participation in thematic committees (e.g., compliance, ESG, risk) and industry consultations.	Employees appointed as committee members.
Suppliers and Business Partners: Including technology vendors, legal advisors, and external consultants.	⇒ Ongoing interaction through procurement processes, performance monitoring, ESG due diligence, and incident response mechanisms.	Oversight by Procurement and Risk divisions, in collaboration with ESG and Legal teams.

Engagement activities are centrally coordinated, and responsibility is distributed across designated departments, depending on stakeholder group, as reported above. All stakeholder channels have assigned owners to ensure monitoring and escalation of issues where needed.

The Bank engages with stakeholders to:

- ⇒ Understand evolving expectations, concerns, and preferences.
- ⇒ Gather data and insights to inform strategy, product innovation, and sustainability goals.
- ⇒ Strengthen trust and long-term relationships.
- ⇒ Ensure regulatory compliance and alignment with best practices.
- ⇒ Identify and manage emerging risks and opportunities relevant to the Bank and its value chain (*ESRS 2-SBM-2.45a iv*).

Outcomes from engagement activities are systematically captured and translated into tangible action across the Bank's operations:

- ⇒ **Strategic Planning:** Customer feedback has shaped the development of digital services and green lending products. Stakeholder insights are reflected in the strategic business plan and sustainability objectives.
- ⇒ **Product Development:** Retail and SME clients have influenced product features, especially around financial inclusion, and ease of access to EIF-backed loans.
- ⇒ **Risk Management:** Employee and client feedback is reviewed for potential reputational, operational, or compliance risks, which are escalated to the Risk Division.
- ⇒ **Policy Updates:** Employee input is used to adapt internal policies (e.g., benefits, work-life balance, training needs), supporting talent retention and workplace satisfaction.

The Sustainability Report itself is reviewed by management bodies, which consider stakeholder insights when approving ESG strategy and disclosures (*ESRS 2-SBM-2.45a v*).

As part of its DMA and due diligence framework, Libra Internet Bank actively integrates stakeholder input into its strategic planning and sustainability decision-making processes. Engagement mechanisms are designed to ensure the Bank captures a diverse range of views across its key stakeholder groups – retail and corporate customers, employees, investors, and regulators.

The Bank employs a multi-channel approach that includes structured interviews with internal and external stakeholders, surveys and feedback mechanisms, as well as the periodic questionnaire Net Promoter Scores (NPS), complaint analysis and trend monitoring from both retail and corporate customers, as well as ongoing dialogue with regulators and professional bodies. These channels enable the Bank to collect qualitative and quantitative insights, which are subsequently reviewed during strategic and risk management meetings and factored into product development, governance enhancements, and disclosure planning.

Through its stakeholder engagement activities, Libra Bank has gathered the following key insights:

- ⇒ **Customer Perspectives:** Clients express a growing awareness of environmental and social issues; however, the pace of transition to sustainable products remains cautious. Demand for green financial products is increasing slowly, indicating the need for customer education, incentives, and clear value propositions in the area of sustainable finance.

- ⇒ **Employees highlight** the importance of a strong ethical culture, clear governance structures, and enhanced internal risk management. Their feedback supports ongoing efforts to maintain high standards for employee training, internal communication, and the Bank's whistleblower protection mechanisms.
- ⇒ **Investor and Regulatory Feedback:** Investors and supervisory authorities emphasize the need for transparency in disclosing sustainability-related risks and performance metrics, as well as integration of ESG factors into lending, investment, and capital allocation decisions (*ESRS 2-SBM-2.45b*).

At this stage, no formal amendments have been made to the Bank's business model or overarching strategy directly as a result of stakeholder engagement. However, several engagement-driven themes have informed internal reviews and will be considered for future updates to product offerings and internal governance (*ESRS 2-SBM-2.45c(i)*).

While not yet implemented, the following actions are under consideration for 2026 based on stakeholder input:

- ⇒ **Product Innovation:** Development of new sustainability-linked lending products tailored to the SME and retail segments, with an emphasis on energy efficiency and digital accessibility.
- ⇒ **Internal Capacity Building:** Expansion of ESG training across departments, including risk, credit, and front-office functions.
- ⇒ **Enhanced ESG Disclosure:** Integration of sustainability metrics into public reports to meet investor and regulatory expectations (*ESRS 2-SBM-2.45c(ii)*).

These planned initiatives are expected to strengthen stakeholder confidence, particularly among clients seeking transparency and among regulators monitoring CSRD/ESRS implementation. Proactive alignment with stakeholder concerns will also reinforce the Bank's brand as a responsible and trustworthy financial partner, contributing to higher engagement and reputational resilience over the long term (*ESRS 2-SBM-2.45c(iii)*).

The Steering Committee and the Board of Administration are informed about the stakeholder engagement and their views with regards to sustainability impacts as part of the sustainability reporting process, through their final approval.

The management of Libra Internet Bank is informed with regard to stakeholder engagement through various channels:

- ⇒ **Customers:** Complaints are monitored and presented monthly to the Steering Committee and quarterly to the Board of Administration. Spikes or increased volumes are analyzed for root causes and proposed solutions. Specific grievances requiring management approval are addressed separately. Customer eNPS survey results are presented to both the Steering Committee and the Board of Administration.
- ⇒ **Employees:** Employee grievances are presented to the Steering Committee based on disciplinary investigation results.
- ⇒ **Investors and Shareholders:** Through periodic general shareholders meetings.
- ⇒ **Regulators and Supervisory:** Requests from regulators are forwarded to management bodies, requiring either Steering Committee approval or direct signatures from a Steering Committee member.
- ⇒ **Professional Organizations:** Relevant presentations and information packages are forwarded to the Steering Committee.
- ⇒ **Suppliers:** For outsourced service suppliers, compliance and potential incidents are reported biannually to the Steering Committee. Operational risk incidents for all suppliers are presented on a case-by-case basis, based on risk levels and potential impacts (*ESRS 2-SBM-2.45d*).

1.3.3. Material impacts, risks and opportunities and their interaction with strategy and business model

Considering that Libra Bank has identified material IROs pertaining to Own Workforce (S1) and Consumers and End-Users (S4), the Bank considers these two groups of stakeholders as key in the sense that their interests, views and rights inform our strategy and business model.

a) Own workforce

Libra Internet Bank recognizes its workforce as a key group of affected stakeholders whose rights, interest and opinions play an important role in shaping the Bank's strategy and business model. Employee well-being, ethical treatment, and long-term engagement represent fundamental elements of the organization's sustainable performance.

The Bank continued to maintain a continuous dialogue with its employees through structured mechanisms such as:

- ⇒ **Organizational culture survey**, through which employees expressed openly and anonymously their views on the workplace environment: work environment, professional relationships, work-life balance, development opportunities, and other relevant aspects.
- ⇒ **Virtual thematic forums** organized whenever specific topics of interest need to be addressed, such as benefits, flexibility, or performance.
- ⇒ **Libra Spotlight Program**, launched in May 2025, strengthens the collaboration between the Bank's divisions, internal dialogue, organizational transparency, and provides a better understanding of interdepartmental contributions. Each month, one division presents (in live online sessions) its activity, contributions, and impact on the organization. All employees are invited to attend, and sessions are recorded and eventually made available on the Libra Internet Bank LMS internal e-learning platform. In 2025, eight live sessions were conducted, with an average of over 300 participants per session and an average NPS score above 9.6/10. The program continues in 2026.

This ongoing engagement ensures that employee views and concerns are actively considered in strategic decision-making processes.

Identified employee interests and priorities include:

- ⇒ Job security and fair compensation
- ⇒ Career development and internal mobility
- ⇒ Work-life balance, especially through hybrid and flexible working options
- ⇒ Workplace health, hygiene, and safety

This information remains essential for aligning HR and governance practices with staff expectations.

The Bank fully complies with Romanian and European labor legislation and with workplace health and safety regulations. It upholds a zero-tolerance stance on human rights violations, and no such incidents have been identified to date.

Employee interests and views are also reflected in operational and strategic decisions, through:

- ⇒ **Flexible Working Model:** Introduced in response to employee feedback, maintaining the balance between productivity and personal well-being.
- ⇒ **Learning and Development:** Continuous investments in employee development support the strengthening of internal expertise and retention.

- ⇒ **Wellbeing initiatives:** Designed and implemented based on employee feedback, supporting health and occupational engagement.

These efforts reflect how employee perspectives directly inform the Bank's culture, long-term planning, and operational efficacy. (S1-SBM-2.12).

b) Consumers and end-users

Consumers and end-users are another critical group of stakeholders whose expectations, rights, and feedback shape the Bank's service delivery and product innovation. The Bank is committed to upholding consumer rights, promoting inclusion, and embedding respect for human rights into its business model and value chain.

The Bank maintains regular dialogue with its consumer base through:

- ⇒ Customer satisfaction surveys and Net Promoter Score (NPS) tracking
- ⇒ Complaints management channels with tracking and escalation for remediation and prevention
- ⇒ Dedicated relationship managers for various customer groups, ensuring direct and specialized support

These channels help the Bank stay responsive to evolving customer expectations.

The Bank safeguards customer rights through:

- ⇒ Robust data privacy practices, fully aligned with the GDPR.
- ⇒ Equal access policies, ensuring no discrimination based on gender, age, disability, or socio-economic status.
- ⇒ Accessibility standards integrated into digital services and branch operations.

These actions support the dignity, privacy, and equal treatment of all customers.

Customer feedback has led to a number of changes in both product design and service delivery, including:

- ⇒ **Digital Inclusion:** Development of simplified digital banking platforms, mobile apps, and online onboarding processes.
- ⇒ **Product Innovation:** Lending product available online to support liberal professions, agricultural clients, and SMEs.
- ⇒ **Financial Education:** Developing and distributing financial education and macroeconomic research content to client groups.

The Bank monitors key consumer protection KPIs, such as complaints, satisfaction scores, and service quality metrics, which are reported to the Steering Committee and Board of Administration. This continuous feedback loop ensures that consumer rights and expectations are integrated into strategic planning and product development (S4-SBM-2.8).

Double materiality results

The Bank reviewed the double materiality analysis for the year 2025, given that no structural changes occurred in the Bank's business model and that exposures within the loan portfolio remained relatively constant; therefore, the material subtopics identified remained the same as in the previous year. We note that, within the current exercise, two entity-specific subtopics were added: Cybersecurity and Financial Crime Prevention.

Following the double materiality assessment process, Libra Internet Bank has identified the following sustainability matters as material from an impact perspective and/or a financial perspective:

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
Climate change (E1)				
Climate related financing	Portfolio (Potential Positive Impact): The Bank's financing activities can positively impact climate change mitigation and community adaptation through its green financing products, aligned with sustainable finance principles. Risks: Misalignment of the Bank's lending practices with decarbonization pathways may generate reputational risks, through insufficient financing of the transition towards a decarbonized economy, transition risks resulting from significant exposures to medium/high-risk sectors (Real Estate and Agriculture), as well as litigation risks associated with greenwashing risks. Opportunities: Expanding sustainable finance can attract ESG-focused investors and differentiate the Bank in the market.	Long-term	The business model may face increased credit risk from potential stranded assets if clients lag in their transition; however, expanding green finance could drive revenue growth and improve the Bank's market reputation, ultimately enhancing its competitive positioning.	The Bank is expected to continue to incorporate climate criteria in its credit analyses, and portfolio monitoring.
Climate change adaptation	Portfolio (Potential Negative Impact): By financing construction and agricultural activities that do not adequately integrate climate adaptation measures, the Bank may indirectly contribute to increasing the exposure of communities and ecosystems to physical climate risks, thereby heightening their vulnerability to climate-related disasters. Examples include financing construction in areas exposed to climate risk and agricultural practices that degrade soil and water resources, reducing resilience to extreme climate events. Risks: Increased loan defaults or impaired asset values may result from severe weather events. Opportunities: The transition towards a more climate-resilient economy creates financing opportunities for adaptation measures, enabling the	Medium-term (impact) Long-term (risk & opportunity)	The Bank's portfolio could experience higher default rates in vulnerable sectors, which might elevate operational risk. Conversely, developing tailored adaptation products can create new revenue streams and help mitigate future losses.	Anticipated changes include updating risk management frameworks and potentially developing specialized adaptation financing products, as well as expanding portfolio monitoring (downstream).

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
	Bank to support clients in managing physical climate risks and to generate long-term revenues.			
Climate change mitigation	Portfolio (Potential Negative Impact): In wholesale and retail trade, emissions from transportation and storage contribute to air pollution and climate change. In public administration, real estate, construction, there are significant greenhouse gas emissions from energy use and materials. In agriculture, intensive practices increase methane and nitrous oxide emissions, impacting climate change. In retail, home, and vehicle loans, financing inefficient buildings and vehicles increases energy consumption and air pollution, affecting the Bank's environmental impact. Own operations (Potential Negative Impact): The use of vehicles with internal combustion engines, energy consumption in office premises, and the procurement of goods and services with high resource intensity contribute to greenhouse gas emissions and air pollution; however, the Bank's overall impact remains limited compared to that of the economy as a whole. Risks: The risks are primarily transition-related and are driven by changes in policies and regulations, as well as by technological and market developments, which may affect the creditworthiness, competitiveness, and asset values of clients with high carbon emissions. Additionally, exposures to such activities may generate reputational risks for the Bank. Increasing prudential and reporting requirements regarding financed emissions may lead to additional compliance and data management costs. These	Short-term (impact) Long-term (risk & opportunity)	Shifting focus toward low-carbon investments can reduce long-term risks and enhance profitability. Successful mitigation initiatives will boost the Bank's reputation and may attract a broader base of ethical investors, positively influencing market stability.	Anticipated changes include updating risk management frameworks and potentially developing specialized mitigation financing products, as well as expanding portfolio monitoring (downstream).

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
	developments may result in higher non-performing loan ratios, a decline in collateral values, adjustments to capital requirements, and higher funding costs for the Bank. Opportunities: Financing the energy transition supports business growth, differentiates the lending offering, and contributes to the development of a more resilient, low-emission portfolio with stable long-term revenues, in line with the Bank's ESG Strategy.			
Energy	Portfolio (Actual Positive Impact): A growing green energy portfolio is focused on providing solar and wind powered alternatives for clean energy generation and directly contributes to a gradual shift nationwide to more sustainable energy production.	Long-term	Fossil fuel exposure increases transition risk; However, a proactive expansion of renewable energy financing can improve asset quality, reduce regulatory penalties, and enhance long-term revenue through diversified energy products.	The Bank will assess the opportunity to expand renewable energy financing, in line with the evolution of market conditions.
Water and marine resources (E3)				
Water withdrawals	Risks: Financing in regions with water scarcity or inefficient water use can lead to credit risk due to operational disruptions. Additionally, long-term resource costs related to circularity, energy, water, and disposal may increase, impacting financial stability.	Medium-term	The Bank's agriculture lending may become vulnerable if water scarcity leads to crop failures or increased input costs. Supporting clients in adopting water-saving technologies can reduce these risks and protect the Bank's loan performance.	The Bank could potentially refine its risk assessment for agriculture clients by requesting water usage metrics and integrate heat maps for draught/flooding risks.
Water consumption	Portfolio (Potential Negative Impact): High water consumption can lead to the depletion of local resources, affecting ecosystems and communities and intensifying competition among agricultural, domestic, and industrial uses.	Medium-term	Increased water consumption risks in the portfolio could result in higher credit losses if client operations are disrupted. However, strategic	Possible adjustments include integrating water efficiency measures into own operations and for portfolio concerns integrating draught heatmaps, particularly for Agriculture

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
			financing of water-efficient projects can lower risk exposure and create a competitive advantage in sustainable finance.	clients, thereby reducing the risk of operational disruptions and enhancing portfolio resilience.
Water discharge	Risks: Changes in perception about an organization's impact can arise from direct company actions, industry effects, and value chain activities. Additionally, new or enforced policies aimed at positive environmental impacts may require adjustments to strategy and business models, leading to increased CapEx/OpEx. These changes can indirectly affect revenues if clients struggle to meet their credit commitments.	Medium-term	Effective water management in the portfolio reduces the risk of regulatory penalties and environmental damage. Emphasizing sustainable water practices can lower long-term operational costs and enhance the Bank's ESG profile.	Possible adjustments include integrating water efficiency measures into own operations and for portfolio concerns integrating draught heatmaps, particularly for Agriculture clients, thereby reducing the risk of operational disruptions and enhancing portfolio resilience.
Own workforce (S1)				
Secure employment	Own Operations (Actual Positive Impact): Ensuring fair and stable employment positively impacts employees. Employees confident in their long-term job prospects experience reduced anxiety over layoffs, leading to higher motivation, engagement, and performance. Job security also reduces stress and mental health issues related to financial uncertainty and career instability. Risks: Failure to ensure workplace safety may lead to increased staff turnover, reduced productivity, and higher recruitment and training costs, while also generating operational, reputational, and litigation risks for the Bank. Opportunities: Maintaining a high level of workplace safety enhances the Bank's attractiveness as an employer, supporting the retention and continuity of qualified staff in key roles. This contributes to reducing recruitment costs and staff turnover and	Short-term (impact) Medium-term (risk & opportunity)	Stability in employment enhances productivity and operational continuity. While higher wage costs might be incurred, these are offset by low staff turnover, better talent retention, and improved service levels that strengthen the Bank's competitive edge.	Employment stability is expected to further reinforce internal operations, reducing staff turnover costs and strengthening the value chain by ensuring a reliable and experienced workforce.

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
	ensures operational continuity, while strengthening the Bank's reputation among stakeholders.			
Working time	Own Operations (Actual Positive Impact): Adequate working hours, compliance with statutory rest periods, monitoring of overtime hours, and a balanced workload promote mental and physical health, reducing burnout and improving job satisfaction.	Short-term	Controlled working time minimizes risks of employee burnout and associated productivity losses. This contributes to cost-effective operations and helps maintain a high level of service quality, thereby enhancing overall business performance.	Controlled working time and a balanced workload are expected to lead to lower employee turnover and improved customer service, with strategic adjustments in human resources practices that positively impact employee engagement and operational outcomes.
Work-life balance	Own Operations (Actual Positive Impact): Supporting work-life balance promotes a more positive and supportive organizational culture, improving relationships between employees and management. Healthy work-life balance can improve physical and mental well-being by reducing stress, burnout, and fatigue.	Short-term	A strong work-life balance drives higher employee engagement and loyalty, reducing recruitment costs and boosting productivity. This, in turn, supports a more resilient and agile business model.	Enhancements in work-life balance are expected to translate into lower employee turnover and improved customer service, with strategic adjustments in HR practices positively impacting employee engagement and operational outcomes.
Social dialogue	Own Operations (Actual Positive Impact): Involving workers in discussions leads to more informed decision-making and sustainable solutions. Social dialogue enhances workforce resilience and morale.	Short-term	Effective social dialogue helps preempt labor disputes and builds a collaborative workplace, which reduces operational risks and fosters a positive corporate culture that supports long-term business stability.	The Bank remains open to all stakeholder feedback, and if relevant, could further integrate stakeholder feedback into strategic decision-making, reinforcing internal dialogue mechanisms that enhance overall operational efficiency.
Freedom of association, the existence of Works Councils and the information,	Own Operations (Actual Positive Impact): Enforcing fundamental labor rights, such as freedom of association, collective bargaining, non-discrimination, and prohibiting forced labor and child labor, positively impacts employees and strengthens the rule of law. Empowering workers to organize helps	Short-term	Strong representation practices enhance workforce stability and reduce the risk of labor disputes, which supports smoother operational management and reduces	Enhanced employee representation is anticipated to lead to more effective internal governance and recruitment practices.

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consultation, and participation rights of workers	them advocate for fair wages, safe working conditions, and job security, creating a more equitable workplace. Supporting freedom of association and employees' rights to information, consultation, and participation strengthens transparency and trust between management and staff, facilitates the early identification of issues, and contributes to organizational stability, employee engagement, and retention.		potential legal liabilities that could impact profitability.	
Collective bargaining, including rate of workers covered by collective agreements	Own Operations (Actual Positive Impact): Collective bargaining provides workers with a structured way to express needs and concerns, ensuring equal representation, especially for vulnerable workers. Workers can negotiate wages, benefits, and working conditions, promoting fair compensation, job security, and safer environments, leading to a motivated and engaged workforce. This supports more equitable and consistent treatment, enhances transparency in the decision-making process, and reinforces employee trust and engagement.	Short-term	Consistent collective bargaining practices ensure predictable labor costs and mitigate risks of disputes, which in turn contribute to operational stability and improved financial performance.	The Bank could reinforce collective bargaining frameworks to secure predictable labor costs and ensure alignment with internal compensation strategies.
Health and safety - S1	Own Operations (Actual Positive Impact): Focusing on health and safety significantly enhances employee well-being by reducing workplace stress and creating a supportive environment. Regular training in occupational health and safety, inspections, and emergency preparedness reduce the risk of incidents, support employee well-being, increase productivity, and ensure legal compliance, thereby contributing to operational stability.	Short-term	Robust health and safety measures lower the risk of workplace incidents, reducing potential liability and ensuring a reliable operational environment that supports long-term financial performance.	Anticipated effects include improved internal risk management and reduced operational disruptions, as robust safety measures are further integrated.
Adequate wages	Own Operations (Actual Positive Impact): Adequate wages improve living standards by meeting basic needs like housing, healthcare, education, and	Short-term	Ensuring adequate wages helps maintain a skilled and motivated workforce, which is	The Bank will continue to periodically adjust wage policies to maintain competitiveness and employee

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
	nutrition, benefiting communities long-term. Fair wages boost employee morale, satisfaction, and well-being, leading to better mental and physical health, motivation, and productivity.		critical for sustained productivity and service quality, even if it slightly increases short-term labor expenses.	satisfaction, reinforcing workforce stability.
Gender equality and equal pay for work of equal value	Own Operations (Actual Positive Impact): Ensuring gender equality and equal pay reduces gender disparities, fosters inclusion, and promotes fairness in labor markets. It also creates a level playing field for career advancement, allowing promotions based on merit and increasing women's access to leadership positions.	Medium-term	Achieving gender equality enhances the Bank's brand and mitigates legal and reputational risks, leading to a more inclusive culture that can drive innovation and improve overall performance.	Anticipated effects include embedding gender equality into recruitment and promotion strategies, improving workforce diversity and enhancing the Bank's overall brand value across both internal operations and customer-facing functions.
Training and skills development	Own Operations (Actual Positive Impact): Continuous training enhances employee competence and productivity, reducing work pressures. Investing in development boosts engagement and retention, fostering loyalty. Skills development supports career progression, improving job satisfaction and motivating employees toward leadership roles. Risks: Improperly scheduled training can disrupt workflows and reduce short-term productivity. Insufficient planning may also create gaps in essential functions while employees are in training. Opportunities: Investing in workforce development builds employee loyalty, reduces turnover, and fosters long-term relationships. Continuous learning enhances employee engagement and retention. Up-to-date skills drive innovation and a competitive advantage, positioning the company to respond to market changes. Internal career development and succession planning reduce the need for external hires and prepare future leaders.	Short-term	Enhanced training programs lead to a more competent and agile workforce, enabling the Bank to adopt new technologies and processes that drive efficiency and competitive advantage.	The Bank will continue to further integrate training programs into its talent development strategy, improving operational efficiency through enhanced employee capabilities.
Measures against violence and	Own Operations (Actual Positive Impact): Prohibiting harassment and encouraging employees	Short-term	Effective measures against workplace harassment reduce	Continuous monitoring of these measures is expected to reduce

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harassment in the workplace	to share concerns prevents detrimental impacts on employees. Strong measures against workplace violence and harassment promote a safe, supportive environment, reducing stress, anxiety, and mental health issues, and improving overall well-being.		legal and reputational risks, contributing to a more stable and productive work environment that supports sustained operational performance.	internal conflicts and legal risks, ensuring stable operations and reinforcing a positive work environment that benefits both employee experience and customer service.
Privacy - S1	Own Operations (Actual Positive Impact): Implementing GDPR processes and procedures protects individuals' privacy, fosters a safe and respectful working environment, mitigates the risk of unauthorized use or disclosure of information, and strengthens employees' trust in internal systems and human resources processes, while enhancing transparency and accountability in data management across the Bank.	Short-term	Rigorous privacy policies minimize the risk of cybersecurity breaches and regulatory penalties, thereby protecting the Bank's reputation and ensuring long-term customer loyalty and operational stability.	The Bank anticipates further investment in IT security (including DORA requirements) and data protection protocols, thereby reducing legal and reputational risks while strengthening customer relationships across its downstream value chain.
Consumers and end-users (S4)				
Privacy - S4	Own Operations (Actual Positive Impact): Implementing GDPR processes and procedures protects individuals' privacy, fosters trust in digital services, reduces the risk of unauthorized access and of data misuse, and promotes transparency and accountability in data handling across society.	Short-term	Enhanced cybersecurity measures not only reduce the risk of costly breaches but also bolster the Bank's image as a secure institution, improving customer confidence and competitive positioning.	Anticipated effects include deeper integration of cybersecurity measures into IT systems and improved customer trust in digital services, reducing potential disruptions and enhancing competitive positioning.
Freedom of expression - S4	Own Operations (Potential Positive Impact): By maintaining open and accessible communication and complaints channels, including digital ones, and by providing clear information on products and services, the Bank enables consumers to express concerns, ask questions, and provide feedback. This supports informed decision-making, the early identification and resolution of issues, and strengthens trust in financial services.	Medium-term	Fostering an environment of free expression enhances customer trust and loyalty. This open approach can lead to innovative product improvements and stronger market positioning, while also managing reputational and legal risks effectively.	The Bank could strengthen open communication with consumers in order to support the continuous improvement of products and customer services.

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Access to (quality) information	Own Operations (Actual Positive Impact): Access to quality information builds consumer trust and confidence, protects them from exploitation, and promotes financial literacy. This ensures consumers make informed decisions, and fosters a safer, more transparent marketplace.	Short-term	Providing high-quality information strengthens customer trust and mitigates legal risks, thereby supporting customer retention and enhancing the Bank's overall reputation for transparency and reliability.	Anticipated effects include refining digital and branch-based communication channels and integrating improved information delivery into customer interactions, thereby reinforcing transparency and regulatory compliance.
Cybersecurity	Own operations (Actual Positive Impact): A robust cybersecurity framework prevents cyber incidents that could compromise customer data and digital services, thus reducing the risk of fraud and financial losses and strengthening customer trust, particularly among vulnerable customers who are disproportionately affected by service disruptions or fraud. Risks: Cybersecurity and IT risks may lead to operational losses, increased response and compliance costs, regulatory actions, litigation, and reputational damage, with adverse effects on customer confidence and increased pressure on funding.	Short-term	Cybersecurity reduces the risk of financial losses, operational disruptions, regulatory sanctions, and reputational damage by protecting consumer and end-user data and ensuring the continuity of digital services. At the same time, it strengthens customer trust and enables the secure and sustainable development of digital channels and products, which are central elements of the Bank's business model.	The Bank will continue to strengthen its cyber resilience through the ongoing assessment of ICT risks, the enhancement of incident prevention and response capabilities, and continuous alignment with applicable regulatory requirements, including DORA, thereby ensuring operational resilience, data protection, and the trust of customers and supervisory authorities.
Responsible marketing practices	Own Operations (Potential Positive Impact): Responsible marketing builds consumer trust and confidence, protects them from exploitation, and promotes financial literacy. This ensures consumers make informed decisions and fosters a safer, more transparent marketplace.	Short-term	Responsible marketing practices reduce the risk of legal penalties and reputational damage, while fostering customer loyalty and improving market competitiveness through ethical and transparent communication.	The Bank can further align its marketing practices and ethical standards by updating internal guidelines and monitoring channels, while improving consumer awareness and engagement.
Business conduct (G1)				
Corporate culture	Own Operations (Potential Positive Impact): A strong, value-driven culture is embedded in all	Medium-term	A robust corporate culture reduces operational and	The Bank expects to reinforce its corporate culture through enhanced

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	aspects of the Bank's operations, guided by a comprehensive Code of Ethics, which enhances customer care and transparency, ensures fair and impartial services, and promotes employee well-being. This fosters trust and satisfaction among customers and employees alike.		compliance risks while improving customer and employee loyalty, thereby contributing to long-term financial stability and competitive advantage.	internal communications and leadership training and by embedding cultural values in customer service protocols, thereby strengthening overall organizational resilience.
Financial Crime Prevention	Own operations (Actual Positive Impact): Reducing negative societal effects generated by money laundering and terrorist financing, breaches of sanctions regimes, and fraud through prevention, detection, and reporting, while strengthening trust in the financial system and protecting customers (including vulnerable consumers) through safer transactions and reduced fraud losses. Portfolio (Potential Positive Impact): Improving the integrity of clients' activities by filtering high-risk relationships and transactions, increasing compliance levels (KYC, transparency, ethical conduct), and reducing the risk of the Bank's services being used for illicit activities. Risks: Deficiencies in the AML/CFT and sanctions framework may give rise to regulatory enforcement risks (fines, remedial measures, restrictions), reputational damage and loss of trust among customers and partners, increased operational costs, fraud losses, and litigation, as well as constrained market access and higher funding costs. Opportunities: Enhanced trust and customer retention through robust controls, reduced fraud losses and cost volatility, improved compliance efficiency through automation and higher data quality, and increased access to correspondent networks/partners, together with a stronger ESG positioning in relations with investors.	Long-term (Own Operations) Short-term (Portfolio)	The prevention of financial crime reduces the risk of regulatory sanctions, financial losses, operational disruptions, and reputational damage, while at the same time protecting customers and the Bank's access to correspondent banking networks and funding. A robust KYC/AML, anti-fraud, and compliance framework supports the trust of customers and partners and enables the sustainable conduct of the Bank's activities across all business segments.	The Bank will continue to implement KYC/AML and anti-fraud controls, expand the use of automated monitoring and screening tools, and maintain alignment with applicable regulatory requirements. It will therefore ensure the continuous protection of customers, reduce exposure to reputational and legal risks, and strengthen the trust of stakeholders.

Topic Cluster	IRO	Time horizon	Impacts on Business Model	Anticipated Effects of Material IROs
Protection of whistle-blowers	Own Operations (Actual Positive Impact): The Bank has secured, confidential channels for reporting misconduct, supported by clear policies, which improve employee morale and trust, enhance ethical culture and transparency, and strengthen governance and accountability.	Short-term	Effective whistleblower protection enhances trust and accountability, reducing the risk of unreported misconduct and its financial and reputational fallout, and thereby safeguarding the Bank's long-term operational stability.	Anticipated effects include enhanced integration of whistleblower mechanisms into governance frameworks and reinforcing a culture of accountability, reducing potential legal and reputational risks.
Bribery and Corruption Prevention and Detection including training	Own Operations (Actual Positive Impact): The Bank employs strict anti-bribery measures, comprehensive KYC/AML/international sanctions protocols, and regular training sessions to deter unethical practices, which enhances ethical and social standards, increases transparency, and strengthens internal culture. Portfolio (Potential Positive Impact): Rigorous monitoring and due diligence ensure high compliance across client and supplier relationships, promoting ethical practices and sustainability. It also contributes to market stability and resilience by supporting responsible and transparent operations.	Long-term (Own Operations) Short-term (Portfolio)	Strong anti-corruption frameworks reduce legal and reputational risks, secure regulatory approval, and can lead to a more robust, resilient portfolio by attracting high-quality clients committed to ethical practices.	The Bank is pursuing the continuous improvement of its internal control systems by updating compliance protocols and due diligence for clients, thereby reducing legal risks and strengthening ethical business practices.

The material impacts identified by Libra Internet Bank, both positive and negative, significantly influence people and the environment. Positive impacts primarily originate from sustainable finance initiatives, including green real estate lending, renewable energy financing, and energy efficiency projects, which actively contribute to reducing greenhouse gas emissions and promoting sustainable development and community health. The material negative impacts are associated with financing sectors such as agriculture, energy, and manufacturing. For instance, clients operating in high water-consumption sectors (e.g., agriculture) or those with fossil-fuel exposure (transport associated with the trade sector) carry risks of environmental degradation, such as water scarcity and increased greenhouse gas emissions. These also lead to potential adverse social impacts, including job insecurity and community stress due to economic disruption. Thus, while the Bank's sustainable finance products can drive positive environmental and social outcomes, effective management is critical to mitigate potential negative impacts related to client activities (*ESRS 2-SBM-3.48c i*).

The material impacts, both environmental and social, originate directly from its financing strategy and internal risk management processes, reflecting the inherent connections between sustainability criteria and Libra Internet Bank's business model. For example, the integration of environmental and social (E&S) criteria into lending directly influences product innovation, including climate-related financing, energy-efficient real estate products, and sustainable agriculture loans. Similarly, impacts linked to workforce practices—such as secure employment, fair remuneration, and health and safety standards—as well as those related to privacy protection, ethical marketing, and corporate governance, are systematically managed through targeted internal policies, HR frameworks, IT security systems, and compliance mechanisms. These operational strategies not only allow the Bank to manage potential negative impacts (e.g., regulatory risks, reputational harm) but also create opportunities for enhanced market reputation, sustained revenue streams from green products, and stronger stakeholder trust (*ESRS 2-SBM-3.48c ii*).

The anticipated material impact has been categorized according to defined time horizons, aligned with Libra Internet Bank's strategic planning and ESRS guidelines:

- ⇒ **Short-term (<1 year)**: Immediate operational risks include adjustments to working-time management, data privacy enhancements, and rapid responses to acute regulatory changes such as GDPR and marketing compliance.
- ⇒ **Medium-term (1–5 years)**: The impact expected over this period includes enhanced employee engagement through improvements in secure employment practices, work-life balance policies, and the embedding of ESG criteria deeper into lending practices. Customer engagement strategies will also progressively yield benefits in digital inclusion and improved transparency.
- ⇒ **Long-term (>5 years)**: Strategic, long-term impacts relate particularly to climate-change mitigation, adaptation, and the expansion of sustainable financing. The full environmental benefits from renewable energy financing and sustainable real estate lending are expected to mature in this timeframe, significantly reshaping the Bank's risk profile and strengthening its market positioning as regulatory frameworks evolve (*ESRS 2-SBM-3.48c iii*).

The material impact is addressed directly through Libra Internet Bank's internal activities and indirectly through its extensive network of business relationships. Internally, the Bank manages sustainability impacts via robust internal controls, HR policies (e.g., secure employment, adequate wages, health and safety), and comprehensive IT and privacy frameworks (GDPR compliance and cybersecurity measures). For example, climate-related risks are directly addressed through client screening, due diligence, and portfolio monitoring practices, especially relevant in sectors with high environmental sensitivity, such as agriculture and energy.

Indirectly, impacts arise through Libra Internet Bank's relationships with borrowers, suppliers (including fintech and technology providers), regulators, and consultants (e.g., sustainability advisors, compliance experts). These business relationships require diligent monitoring and engagement, particularly within lending portfolios exposed to environmental or social sensitivities (*ESRS 2-SBM-3.48c iv*).

The double materiality assessment identified specific sustainability-related risks and opportunities currently influencing its financial performance:

- ⇒ **Operating Costs:** Current financial results reflect an increase in operating expenses, driven by investments in upgraded risk management systems (particularly related to regulatory requirements such as bank resolution requirements, Basel IV, and ESRS/CSRD), and the engagement of expert consultants. While these expenditures elevate short-term costs, they contribute to long-term improvements in operational efficiency, regulatory compliance, and reduced risk exposure.
- ⇒ **Revenue Generation:** Revenue streams are positively influenced by emerging opportunities linked to the Bank's sustainable finance initiatives, including digital inclusion platforms, green loans, sustainability-linked financing, and EIF-backed lending programs. Although initially modest, these opportunities progressively enhance revenue as market acceptance of sustainable financial products grows, reflecting evolving client preferences and regulatory incentives.
- ⇒ **Investment Outlays:** The Bank's current cash flows reflect significant capital expenditures directed toward technology infrastructure, cybersecurity, digital customer engagement, and analytics systems essential for effective risk management and compliance. These investments underpin regulatory adherence, reduce operational risks, and position the Bank competitively in sustainable and digital finance markets (*ESRS 2-SBM-3.48d*).

Libra Internet Bank anticipates differentiated financial effects from proactively integrating sustainable finance and ESG criteria across defined time horizons:

- ⇒ **Short-term (<1 year):** Immediate financial implications include modest increases in operating expenses related to upgrading IT systems, enhancing data privacy controls, and improving internal ESG training programs. These initial investments are projected to deliver short-term regulatory compliance improvements, mitigate immediate operational risks, and strengthen customer trust and market credibility.
- ⇒ **Medium-term (1–5 years):** Financial effects during this period are anticipated to include significant shifts in the Bank's lending portfolio risk profile, driven by the maturation of sustainable finance products such as green loans, sustainability-linked loans, and renewable energy financing. The integration of climate and ESG factors into credit models is expected to enhance financial resilience, diversify revenue streams, and improve risk-adjusted returns. Operational efficiency and reduced compliance costs further support financial performance.
- ⇒ **Long-term (>5 years):** Over the long term, the Bank expects substantial strategic financial benefits, including a stronger balance sheet, increased market valuation, and more resilient cash flows. Long-term reductions in credit and reputational risks, coupled with expanded market opportunities in low-carbon finance and digital banking, should result in sustained profitability. Enhanced market positioning is anticipated to attract ESG-focused investors, ensuring long-term competitive advantage, steady financial performance, and lower earnings volatility (*ESRS 2-SBM-3.48e*).

To manage material sustainability risks and capture strategic opportunities, investment and disposal plans include:

- ⇒ **Capital Expenditure & Asset Transformation:** Ongoing capital expenditures target upgrades to digital infrastructure, compliance systems, and risk management technologies. Specific investments include advanced analytics for portfolio monitoring, cybersecurity enhancements (aligned with DORA requirements), and digital platforms promoting financial inclusion and customer engagement.
- ⇒ **Business Transformation & Innovation:** The Bank plans the expansion of sustainable finance, green project financing, and digital banking innovation. It actively explores joint ventures and collaborations with fintech partners to drive innovation in the banking system. Furthermore, the diversification of its loan portfolio through EU-backed programs (e.g., EIF-supported initiatives) will be continued, which enhances market reach and contributes to financial inclusion. Additionally, the Bank will encourage the financing of energy-efficient buildings, aligning its asset portfolio with evolving market demands (*ESRS 2-SBM-3.48e i*).

Libra Internet Bank has identified diverse funding sources to execute its strategy and address identified material risks and opportunities:

- ⇒ **Deposit Funding and Core Banking Operations:** Customer deposits continue as the primary, stable, and cost-efficient funding source, supporting lending growth, digital transformation, and sustainability investments.
- ⇒ **Capital Markets and Bond Issuances:** The Bank plans bond issuances to diversify funding, reduce concentration risks, and support strategic initiatives including sustainable finance and technological infrastructure projects.
- ⇒ **Internal Capital and Retained Earnings:** Strategic reinvestment of profits and optimization of operational expenditures will fund targeted investments in digital transformation, compliance enhancements, and sustainable product development.
- ⇒ **Strategic Partnerships:** Partnerships with fintech companies and financial institutions will supplement funding, distribute investment risks, accelerate technology adoption, and support innovative financial products, ensuring faster market penetration and strategic agility (*ESRS 2-SBM-3.48e ii*).

The Bank conducted an internal assessment of potential financial effects, which combines qualitative and quantitative assessments (via internal workshops and expert judgment) across ESRS-defined time horizons:

- ⇒ **Short-Term (<1 year):** Immediate enhancements in IT infrastructure, data privacy controls, and risk management processes will stabilize operational capacity, reduce short-term compliance risks, and moderately increase operating costs. These investments improve efficiency and regulatory alignment.
- ⇒ **Medium-Term (1–5 years):** Expanded sustainable finance initiatives, digital retail offerings, and diversified lending products (EIF-backed loans) are projected to reduce portfolio-level credit and reputational risks. Incremental revenue growth is anticipated through these strategic adjustments, supported by enhanced risk-adjusted returns as ESG factors integrate further into credit and risk models.
- ⇒ **Long-Term (>5 years):** Strategic shifts, including promoting energy-efficient real estate financing and broader digital inclusion, are expected to significantly enhance the Bank's competitive positioning, financial resilience, and market valuation. Long-term sustainable practices embedded in both upstream supplier selection and downstream portfolio management will enhance financial stability, reduce volatility, and generate sustained revenue growth aligned with regulatory evolution.

Libra Internet Bank's strategy includes sustained investment in digital transformation, robust ESG risk management, and targeted expansion of sustainable finance offerings. These actions, reinforced by diversified funding sources, proactive stakeholder engagement, and robust internal controls, ensure the business model's resilience and adaptability to evolving sustainability impacts, risks, and market opportunities (*ESRS 2-SBM-3.48f*).

All significant impacts, risks, and opportunities identified through the Bank's double materiality assessment are covered comprehensively by the standard ESRS Disclosure Requirements, to which entity-specific information on climate-related financing, cybersecurity, and the prevention of financial crime.

Significant topics and associated ESRS sub-topics covered by standard disclosures include:

ESRS Disclosure Requirement	ESRS Sub-topic
E1	Climate-related financing (entity-specific)
E1	Climate change adaptation
E1	Climate change mitigation
E1	Energy
E3	Water withdrawals
E3	Water consumption
E3	Water discharges
S1	Secure employment
S1	Working time
S1	Work-life balance
S1	Social dialogue
S1	Freedom of association, existence of works councils, and the information, consultation, and participation rights of workers
S1	Collective bargaining, including rate of workers covered by collective agreements
S1	Workplace health and safety
S1	Adequate wages
S1	Gender equality and equal pay for work of equal value
S1	Training and professional skills development
S1	Measures against violence and harassment in the workplace
S1	Privacy (Workforce)
S4	Privacy (Consumers/Customers)
S4	Freedom of expression
S4	Access to quality information
S4	Cybersecurity (entity-specific)
S4	Responsible marketing practices
G1	Corporate culture
G1	Protection of whistle-blowers
G1	Financial crime prevention (entity-specific)
G1	Bribery and corruption prevention and detection, including training

Entity-Specific Disclosures

⇒ Climate-related financing

Climate-related financing represents an important material topic, specific both to the financial-banking services market and to the operational and strategic context of Libra Internet Bank given the specificity of the Bank's financing activities, its exposure to certain economic sectors, and associated risks and opportunities, additional entity-specific disclosures beyond the standard ESRS framework are required. These disclosures include further details on sector-specific financed emissions, and customized risk management measures that are particularly relevant to Libra Internet Bank's distinct business model and market presence (*ESRS 2-SBM-3.48h*).

⇒ Cybersecurity

Libra Internet Bank treats cybersecurity as an entity-specific material subtopic, as is the case for the entire financial services market, given the high dependence on ICT infrastructure, digital channels, and critical applications used to deliver banking services.

To protect the confidentiality, integrity, and availability of data and digital banking services, Libra Internet Bank has implemented a cybersecurity framework primarily based on the Information Security Policy, Cybersecurity and Resilience Strategy, Information Security Incident Response Procedure, ICT Vulnerability Management Procedure, and the Digital Operational Resilience Testing Program Policy. This framework aims to prevent cyberattacks, quickly detect and respond to incidents, protect client data, and ensure continuity of the Bank's essential services. In this way, the Bank directly reduces the risk of fraud, unauthorized access, service unavailability, and financial losses for clients.

The scope of this framework extends across the entire Bank and covers ICT infrastructure, critical applications, digital customer interaction channels, data processed in banking operations, and relationships with relevant third-party providers. Measures apply to all employees, collaborators, and users of the bank's IT systems, as well as IT or business projects in development or implementation. Through this approach, the Bank seeks to protect end-users and strengthen trust in its digital services.

Implementation of cybersecurity measures is a continuous process. The Bank constantly monitors cyber threats, performs vulnerability scans, penetration tests, and digital operational resilience exercises, and periodically updates policies, controls, and technical and organizational measures. At the same time, detection, response, and recovery capabilities are enhanced, including improving controls applied to Internet Banking and Mobile Banking systems and periodically testing continuity and recovery plans. These actions have an immediate positive impact by limiting exposure to service disruptions, fraud and data leaks.

In the event of a security incident, the Bank applies a formal process for reporting, classification, investigation, remediation, and post-incident analysis, with escalation to the relevant governance structures depending on severity. This approach helps reduce operational losses, remediation costs, regulatory exposure, and reputational risks associated with ICT incidents. At the same time, the continuous strengthening of cyber resilience creates a medium-term opportunity by increasing customer trust and retention, supporting the secure development of digital channels and products, and reducing the volatility of losses associated with cyber threats.

The Bank also pursues the continuous improvement of the maturity of its cybersecurity framework through the annual update of risk and performance indicators, expansion of specialized resources, strengthening of technical controls, and enhancement of operational resilience. For operational security reasons, the Bank does not publish internal procedures and sensitive technical indicators, however these processes are constantly applied, and indicators are monitored internally and used in decision-making and reporting to management structures.

⇒ **Preventing financial crime**

Libra Internet Bank considers combating financial crime a material entity-specific subtopic, given the inherent exposure of a credit institution to risks such as money laundering, terrorist financing, fraud, violations of sanctions regimes, and misuse of the Bank's products and services for illicit purposes. The Bank has implemented an internal prevention and control framework covering client onboarding, risk assessment, transaction monitoring, client and transaction screening, alert investigation, and reporting of suspicious activity, aimed at protecting clients, the Bank, and the integrity of the financial system.

The internal framework is defined by the AML/CFT Standard and the International Sanctions Management Standard, along with related documents that provide for risk assessment, application of standard and enhanced customer due diligence measures, identification of the ultimate beneficial owner, PEP/sanctions/adverse media screening, continuous monitoring of business relationships, and alert management. The Bank uses dedicated tools for screening and monitoring, including internally developed AML modules and other specialized applications, with responsibilities distributed across the first and second lines of defense, escalating to competent structures when relevant suspicions are identified.

This framework applies Bank-wide and covers client relationships, products, distribution channels, transactions, and interactions with relevant third parties. The Bank applies a risk-based approach to managing financial crime risks, including due diligence at the start of a business relationship, periodic updating of information, identification of the ultimate beneficial owner, customer risk classification, the application of enhanced measures for high-risk cases, and continuous monitoring of account activity and transactions.

The implementation of financial crime prevention measures is supported by operational controls, dedicated applications and workflows, and the involvement of relevant structures from the three lines of defense. The Bank conducts alert monitoring and analysis activities, screening against relevant lists, investigation of unusual transactions or behaviors, escalation of significant cases, and periodic staff training. In parallel, mechanisms exist for reporting suspicions and internal channels to flag non-compliant behavior, including fraudulent, corrupt, or criminal acts. These actions directly reduce the risk of the bank's services being used for illicit fund flows, they protect clients, including those vulnerable, and they strengthen trust in the Bank and the financial system.

From an impact perspective, the Bank has identified a predominantly positive material impact, both through its own operations and via client relationships and the portfolio, resulting from its capacity to prevent, detect, and report suspicious activity and filter high-risk relationships and transactions. From a financial perspective, the Bank has identified a material risk associated with potential control deficiencies that could result in sanctions, remediation costs, fraud losses, litigation, reputational damage, and increased operational costs. At the same time, the Bank identifies a medium-term material opportunity arising from strengthened client and partner trust, reduced volatility of fraud-related losses, and increased operational efficiency through automation and improved quality of data used in monitoring and control.

Internal procedures are not publicly available but are accessible to Bank employees, and indicators and alerts are monitored internally and used in decision-making and reporting processes to management structures.

1.4. Management of Impacts, Risks and Opportunities

1.4.1. Disclosures on the process of the Double Materiality Assessment

Libra Internet Bank's double materiality assessment is designed using a robust multi-method approach to comprehensively identify and evaluate material impacts, risks, and opportunities. Key methodologies include:

- ⇒ **Interdivision Interviews:** Structured interviews and targeted email consultations were conducted across multiple divisions (e.g., Retail Banking, Corporate Banking, Risk & Compliance, HR) to identify ESG-related impacts, risks, and opportunities. These interactions captured division-specific insights regarding how ESG and regulatory developments may influence operations, customer relationships, and product offerings, including current risk management and opportunity identification practices.
- ⇒ **Stakeholder Engagement:** The Bank engaged with stakeholders, including customers, employees, investors, regulators, and civil society organizations, through surveys, feedback mechanisms, and complaint channels. This process captured external expectations and concerns, directly informing the prioritization of material topics.
- ⇒ **An expert panel** composed of employees, including members of the sustainability team, has reviewed initial feedback from interviews and stakeholder engagement. The panel provided expert judgments on the severity, scope, and likelihood of ESG-related impacts, risks, and opportunities, integrating technical expertise (e.g., climate science, social impact analysis) into the prioritization process.
- ⇒ **Portfolio Analysis:** Quantitative analysis was performed on the Bank's lending and investment portfolios to identify ESG-related exposures. This involved evaluating indicators such as sectoral exposures (energy, agriculture, real estate), carbon intensity, water usage, and social risks. This analysis validated and refined the Bank's understanding of material topics, informing strategic risk mitigation and product innovation.

The following key assumptions were taken into consideration by Libra Internet Bank during the double materiality assessment:

- ⇒ **Defined Time Horizons:** Short-term (<1 year), medium-term (1–5 years), and long-term (>5 years) horizons were applied as per ESRS 1, enabling identification of immediate operational risks, medium-term strategic shifts, and long-term transformational opportunities.
- ⇒ **Data Reliability and Availability:** The Bank assumes historical performance data, market trends, and regulatory guidance used are reliable and reflective of current conditions. Ongoing updates and validation ensure data relevance.
- ⇒ **Stakeholder Interest Prioritization:** Stakeholder input is assumed representative of broader market and societal expectations, with greater emphasis placed on feedback from critical groups such as customers and investors.
- ⇒ **Integration of Qualitative and Quantitative Data:** The combined use of qualitative expert judgments and quantitative portfolio data provides a balanced perspective, essential for identifying both measurable impacts and nuanced insights (*ESRS 2-IRO-1.53a*).

This process aligns with the double materiality principle, integrating internal data (lending practices, digital initiatives) and external inputs (stakeholder insights, regulatory developments), providing comprehensive coverage of ESG-related impacts (*ESRS 2-IRO-1.53b*).

The DMA explicitly targets activities and business relationships posing heightened ESG risks, such as climate-related financing in environmentally sensitive sectors (e.g., agriculture, energy). Geographic considerations are minimal due to the Bank's exclusive operation within Romania, where regulatory requirements and ESG conditions are relatively uniform (*ESRS 2-IRO-1.53b i*).

The impact of both the Bank's internal operations (e.g., HR policies, lending criteria) and external business relationships (e.g., supplier due diligence, downstream customer impacts) is evaluated. This dual perspective ensures comprehensive understanding and management of the Bank's overall impact footprint (*ESRS 2-IRO-1.53b ii*).

Stakeholder consultations (surveys, roundtables, regulatory engagement) and collaboration with external sustainability experts ensure credibility and robustness. Expert insights help capture emerging risks and validate findings (*ESRS 2-IRO-1.53b iii*).

Negative impacts are assessed based on severity and likelihood; positive impacts are assessed by scale, scope, and likelihood, consistent with ESRS 1 Section 3.4 (Impact Materiality). For example, climate adaptation risks are prioritized by potential credit impacts, while opportunities such as digital lending or sustainable real estate finance are prioritized by revenue potential and risk reduction capability (*ESRS 2-IRO-1.53b iv*).

This structured approach, mentioned above, incorporates internal and external inputs using defined impact and financial materiality scales. These scales enable the Bank to evaluate the severity, likelihood, and potential financial consequences of each identified issue, ensuring informed decision-making aligned with strategic priorities (*ESRS 2-IRO-1.53c*).

In order to identify connections between impacts and dependencies with risks and opportunities, Libra Internet Bank analyzed interdependencies between its sustainability impacts (e.g., climate-related financing, water management, social issues) and operational dependencies.

Examples of such connections include:

- ⇒ **Fines and Reputational Damage:** The Bank evaluates the financial implications of potential regulatory penalties or reputational harm resulting from lapses in ESG compliance, such as inadequate climate due diligence.
- ⇒ **Disrupted Business Continuity:** The assessment examines how extreme weather events might disrupt borrower operations (especially in agriculture or real estate), potentially leading to higher credit default rates.
- ⇒ **Expanding Customer Base:** The analysis identifies opportunities, such as digital retail expansion and diversified EU-backed loan programs, which can boost revenue growth and enhance market presence.

Libra Internet Bank assumes that high-exposure sectors, such as agriculture and energy-intensive industries, carry greater potential risks or opportunities. By systematically integrating both negative and positive financial effects, the Bank strategically balances risk mitigation and opportunity capture (*ESRS 2-IRO-1.53c i*).

In assessing likelihood, magnitude, and nature of effects, Libra Internet Bank considered the following:

- ⇒ **Qualitative Inputs:** Qualitative data gathered from interdepartmental interviews and stakeholder consultations provide nuanced perspectives on potential reputational risks, operational disruptions, and strategic opportunities, directly informing materiality judgments.

- ⇒ **Quantitative Thresholds:** Financial materiality scales establish clear thresholds to quantify potential revenue impacts, cost implications (e.g., regulatory fines, operational expenses), and credit risk variations. For instance, high likelihood of regulatory penalties or significant portfolio credit deterioration triggers elevated materiality ratings. Quantitative thresholds used in determining risk categories were:

High Impact:	Operational and other areas (Compliance, Reputational etc.): Financial loss/benefit of RON 10 million or more. Portfolio: Financial loss/benefit of RON 25 million or more.
Medium Impact:	Operational and other areas (Compliance, Reputational etc.): Financial loss/benefit of RON 4 million up to RON 9.99 million Portfolio: Financial loss/benefit of RON 8 million up to RON 24.99 million
Low Impact:	Operational and other areas (Compliance, Reputational etc.): Financial loss/benefit of RON 1 million up to RON 3.99 million Portfolio: Financial loss/benefit up to - 2 million up to RON 7.99 million

- ⇒ **Integrated Analysis:** The Bank employs a weighted scoring model combining qualitative insights and quantitative measures. Each identified risk or opportunity is scored for severity and likelihood across defined time horizons (short: <1 year; medium: 1–5 years; long: >5 years), enabling comprehensive analysis of immediate operational risks and longer-term strategic implications.
- ⇒ **Outcome of the Assessment:** This integrated approach results in a clear prioritization hierarchy of risks and opportunities. For example, short-term investments in enhanced data security infrastructure may initially elevate operating costs but are justified by significantly reduced medium-term exposure to costly cybersecurity breaches (*ESRS 2-IRO-1.53c ii*).

Libra Internet Bank prioritized its sustainability-related risks relative to other risks with the help of the following risk-assessment framework and tools:

- ⇒ **Comparative Analysis:** Sustainability-related risks are integrated into the broader Enterprise Risk Management (ERM) framework, alongside strategic, market, financial, compliance, and technological risks. The Bank utilizes impact and financial materiality scales, ensuring consistent and comparative evaluation across diverse risk categories.
- ⇒ **Relative Weighting:** The Bank assigns specific weights to sustainability risks based on potential financial impacts. For example, climate change adaptation risks receive high prioritization due to potential disruptions in loan portfolio quality, even if such risks manifest predominantly in the medium to long-term horizon.
- ⇒ **Decision Support:** The outcomes of risk assessments—combining qualitative assessments and quantitative metrics—directly inform strategic planning and capital allocation. This ensures sustainability risks and opportunities receive appropriate attention relative to traditional business risks, fostering holistic risk management (*ESRS 2-IRO-1.53c iii*).

Upon completion of the DMA exercise, Libra Internet Bank's decision-making process integrates material sustainability impacts, risks, and opportunities alongside financial considerations into strategic and operational decisions. Key elements include:

- ⇒ **Interdepartmental Coordination:** A dedicated Sustainability Team coordinated by the Chief Risk Officer (CRO), comprising representatives from Risk, Compliance, Legal, European Funds, and Marketing divisions oversees materiality assessments.
- ⇒ **Structured Evaluation:** Decisions leverage qualitative inputs (interdivision interviews, stakeholder feedback) and quantitative assessments (impact and financial materiality scales), ensuring comprehensive prioritization of sustainability issues.
- ⇒ **Board-Level Oversight:** Results from the materiality assessments are presented to and validated by the Steering Committee and the Board of Directors (BoD), who approve strategic adjustments and capital allocation decisions consistent with sustainability goals.
- ⇒ **Internal Control Procedures:** To ensure robustness and integrity, the Bank's internal control procedures include:
 - **Risk Management Framework:** Sustainability-related risks are integrated into lending operations via the Environmental and Social Management System (ESMS), as detailed in the E&S internal policy.
 - **Compliance and Assurance Functions:** Internal Audit and Compliance departments regularly review risk scoring accuracy, adherence to regulatory standards (GDPR, EU Taxonomy), and stakeholder engagement efficacy. These teams also review the DMA process.
 - **Documentation and Transparency:** Methodologies, assumptions, and materiality thresholds are thoroughly documented, providing transparency, traceability, and accountability in decision-making processes (*ESRS 2-IRO-1.53d*).

The Bank integrates sustainability-related risk identification, assessment, and management into its overarching risk management framework through the internal ESMS (Environmental and Social Management System). (*ESRS 2-IRO-1.53e*).

Following Libra Internet Bank's DMA exercise, sustainability opportunities identified are directly integrated into overall management processes. For instance, opportunities to enhance digital inclusion and expand retail lending which will drive revenue growth and the improvement of financial performance. Regular monitoring and data analysis ensure ongoing alignment with emerging market trends and regulatory changes, informing strategic planning and resource allocation decisions (*ESRS 2-IRO-1.53f*).

The double materiality assessment comprehensively covers Libra Internet Bank's full value chain. It addresses upstream activities through due diligence and assessment processes for suppliers, market research, and third-party relationships to identify external risks and opportunities. For its own operations, it focuses on internal management of operational risks, human resources policies, compliance, and internal controls. Downstream activities include evaluating customer outcomes and societal and environmental impacts resulting from financing activities, such as green lending and sustainable real estate financing, as well as portfolio-level ESG management. (*ESRS 2-IRO-1.53g*).

There are no changes to the DMA process compared to the prior period. The Double Materiality Assessment process will be reviewed annually, and any modifications will be documented subsequent reports. (*ESRS 2-IRO-1.53h*).

The Bank's process to identify and assess climate-related impacts, specifically Greenhouse Gas (GHG) emissions, integrates qualitative and quantitative analyses guided by defined impact and financial materiality criteria. This involves collaboration between the ESG team and the internal divisions responsible for Procurement, Operations, and Finance, ensuring that climate considerations are embedded in strategic and operational decision-making.

- ⇒ Data Collection and Use of Proxies: Scope 1, 2, and 3 Emissions: Internal data from energy use and operational activities (Scope 1 & 2) are accurately recorded and assessed. However, due to limited client-level emissions data related to Scope 3 Category 15, the Bank employs standard proxy indicators that combine emissions data (at the country, industry, or financed-asset level) and financial metrics to estimate portfolio emissions.
- ⇒ External Expertise: Specialist consultants validate GHG estimation methodologies, ensuring compliance with recognized frameworks such as the EU Taxonomy.
- ⇒ Cross-Departmental Coordination: Regular cross-departmental collaboration ensures continuous data refinement and accurate representation of climate impacts (*E1-IRO-1.20a*).

While the Bank has not historically documented physical climate risks comprehensively, it plans to leverage the results of the DMA to explore the possibility of expanding monitoring processes for high-risk sectors to identify emerging risks (*E1-IRO-1.20b i*).

The Bank intends to implement sensitivity analyses for the following reporting periods, as follows:

- ⇒ **Vulnerability Assessments:** Reviewing lending portfolios, identifying sectors most susceptible to physical climate events.
- ⇒ **Supply Chain Analysis:** Identifying dependencies potentially affected by climate disruptions.
- ⇒ **Operational Sensitivity Analysis:** Assessing resilience of physical branches and digital channels to extreme climate events, leveraging existing Business Continuity Plans (BCP) and Business Impact Analyses (BIA) (*E1-IRO-1.20b ii*).

Process to Identify and Assess Climate-Related Physical Risks (Detailed Requirements)

The Bank is in the process of developing quantitative analyses regarding physical risks. As of the reporting date, the Bank identified climate-related risks based on feedback received from the relevant stakeholders involved and on internal analyses. (*E1-IRO-1.AR 11a*).

Currently, no formal definitions aligned with asset lifetime or capital planning exist. Future assessments will explicitly align time horizons with ESRS 1 and strategic planning periods:

- ⇒ **Short-Term (<1 year):** Immediate operational and regulatory climate risks.
- ⇒ **Medium-Term (1–5 years):** Adjustments to client behavior and evolving climate risk landscapes.
- ⇒ **Long-Term (>5 years):** Strategic transitions to low-carbon, climate-resilient business models (*E1-IRO-1.AR 11b*).

No comprehensive assessment has yet been completed. Planned future assessments will incorporate vulnerability reviews of lending portfolios, supply chain analyses, and business activity resilience evaluations, considering hazard likelihood, magnitude, duration, and geographic specifics (e.g., NUTS regional breakdown) (*E1-IRO-1.AR 11c*).

Currently, no scenario analyses using explicit high-emissions projections (e.g., IPCC SSP5-8.5, NGFS “Hot House World”) have been conducted. Future assessments may include these scenarios, contingent on regional climate data availability, to inform hazard identification and sensitivity evaluations (*E1-IRO-1.AR 11d*).

Identification and Assessment of Climate-Related Risks and Opportunities

As mentioned above, the Bank plans to incorporate climate-related assessments into its materiality analysis to identify, evaluate, and prioritize physical and transition risks (e.g., extreme weather, regulatory shifts, market transitions) and opportunities (e.g., sustainable lending, digital inclusion) across short-term (<1 year), medium-term (1–5 years), and long-term (>5 years) horizons. The methodology primarily relies on qualitative insights complemented by established impact and financial materiality thresholds.

The current assessment integrates various elements to provide a comprehensive view. It includes internal data, such as operational metrics, risk dashboards, and portfolio exposure analyses. Additionally, it incorporates external input, including stakeholder feedback, industry guidelines, and market forecasts. This holistic approach ensures a thorough and well-rounded analysis. Due to limited availability of client-specific climate data, the Bank employs proxy indicators, particularly for estimating GHG emissions. Consequently, the current assessment approach remains predominantly qualitative, acknowledging ongoing developments to enhance quantitative capabilities.

Insights from the assessment are systematically integrated into the overall materiality assessment framework. This integration enables the Bank to identify assets and business activities that are potentially exposed to climate-related physical hazards or transition risks. Additionally, it highlights significant climate-related opportunities, such as sustainable finance initiatives and digital banking transformation. The assessment explicitly evaluates impacts over three defined time horizons:

- ⇒ **Short-term (<1 year):** Immediate operational and compliance-related climate risks.
- ⇒ **Medium-term (1–5 years):** Evolving risks/opportunities influencing client preferences, product performance, and regulatory landscape.
- ⇒ **Long-term (>5 years):** Strategic risks/opportunities linked to transitions such as investments in renewable energy, sustainable real estate financing, and adaptation to climate policy shifts.

By combining qualitative assessments with clear materiality thresholds, the Bank captures the spectrum of climate-related risks and opportunities. Although quantitative assessment remains limited due to client-level data availability, the existing methodology provides a firm foundation for integrating climate considerations into strategic decision-making and risk management (*E1-IRO-1.21*).

Identification and Assessment of Climate-Related Transition Risks and Opportunities in Operations and Value Chain

The Bank considers qualitative assumptions (regarding material and financial impacts), starting from the requirement to limit warming to 1.5°C, with no or limited overshoot, to identify climate-related transition events across its operations and value chain.

This process involves analyzing transition events such as regulatory developments, which include enhanced carbon pricing and stricter emissions standards, market-driven shifts toward low-carbon products and services, technological advancements that influence energy consumption and carbon intensity. Identification relies extensively on various methods, including interdepartmental interviews that capture internal insights, expert panel judgments for specialized technical evaluations, stakeholder consultations which offer valuable market expectations and regulatory outlooks.

- ⇒ These inputs assist the Bank in pinpointing which transition events are most likely to materially impact its assets, operations, and portfolio management practices. Key focus areas include digital transformation in retail finance, sustainable real estate financing, and the development of green loan products—sectors identified as especially sensitive to climate-related regulatory and market shifts (*E1-IRO-1.20c i*).

Following the identification of transition events, the Bank systematically assesses the exposure of its assets and business activities to these events, quantifying transition risks and opportunities through vulnerability analyses and comprehensive value chain assessments. The Bank evaluates the vulnerability of lending and investment portfolios to identified transition events by:

- ⇒ Reviewing historical financial performance and credit risks in sensitive sectors (energy, real estate, consumer finance).
- ⇒ Applying financial materiality scales to assess potential impacts on revenues, cost structures, and creditworthiness.

The assessment extends throughout the Bank's entire value chain:

- ⇒ **Upstream:** Analysis of suppliers' environmental practices and risks potentially magnifying the Bank's own transition risks.
- ⇒ **Downstream:** Evaluation of customer behavior shifts, emerging preferences for green financial products, and evolving consumer credit risk profiles, highlighting strategic opportunities for sustainable growth (*E1-IRO-1.20c ii*).

The Bank systematically screens its assets and business activities against the above-mentioned transition events through internal portfolio monitoring and external expert consultations as part of its DMA exercise (*E1-IRO-1.AR 12a*).

The Bank evaluates the extent to which its assets and business activities are exposed and sensitive to identified climate-related transition events. This structured assessment process involves:

- ⇒ **Evaluating Magnitude and Likelihood:** Using defined impact and financial materiality scales, the Bank quantifies potential financial implications such as regulatory fines, increased operational costs, or revenue opportunities (e.g., market expansion into green financial products).
- ⇒ **Vulnerability Assessments:** Conducting detailed sector-specific analyses for high-priority sectors — energy, real estate, and digital retail — to precisely identify the magnitude, likelihood, and duration of potential financial impacts associated with transition events.

This comprehensive approach provides clarity on transition risks and opportunities, enabling strategic and operational decision-making informed by thorough assessments of potential effects (*E1-IRO-1.AR 12b*).

Existing exposures in certain economic sectors may require clients to conduct operational adjustments, supported by bank-provided financing solutions, but no exposure is classified as fundamentally incompatible (*E1-IRO-1.AR 12d*).

There are no critical climate-related assumptions in the financial statements, as such, alignment with the climate scenarios used by the Bank in its materiality and scenario analysis processes is not applicable (*E1-IRO-1.AR 15*).

Libra Internet Bank employs a comprehensive materiality assessment process aligned with the double materiality principle as outlined in ESRS 1, Section 3.2. This approach ensures a balanced evaluation of sustainability impacts, risks, and opportunities concerning both their effects on people and the environment, as well as their financial implications for the Bank's performance and operations.

The Bank uses clearly defined quantitative and qualitative thresholds to determine material information, evaluating the scale, scope, and likelihood of each identified impact, risk, and opportunity through a structured internal risk scoring model. This model integrates quantitative metrics, such as potential revenue impacts, cost implications, regulatory penalties, and shifts in credit risk, alongside qualitative insights, including stakeholder concerns, reputational considerations, regulatory guidance, and expert judgment. In line with ESRS 1 (Section 3.2 and Annex E), the Bank ensures that individual disclosure points deemed immaterial—even when under generally material topics—are appropriately excluded from disclosure. This approach ensures that disclosures remain relevant, clear, and focused.

Through systematic application of these criteria and thresholds, Libra Internet Bank ensures that its sustainability disclosures meet the criteria of relevance, accuracy, and completeness required under ESRS 2-IRO-2.59. Only topics that surpass the defined materiality thresholds, in accordance with ESRS 1 guidance, are reported, thus enabling stakeholders to clearly identify and focus on the most critical sustainability impacts, risks, and opportunities relevant to the Bank's ongoing development, performance, and strategic position (*ESRS 2-IRO-2.59*).

(*ESRS 2-IRO-2.56*)

1.4.2. ESRS reporting requirements covered by the company's sustainability statement

1.4.1.1. Contents of ESRS reporting requirements

List of reporting requirements		Page
ESRS 2 General Information Presentations		
BP-1	General basis for the preparation of sustainability claims	69
BP-2	Disclosures in relation to specific circumstances	70
GOV-1	Role of administrative, management and supervisory bodies	72-77
GOV-2	Information provided to the company's administrative, management and supervisory bodies and the sustainability issues addressed by them	75
GOV-3	Integration of sustainability-related performance into incentive schemes	75
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SBM-1	Strategy, business model, and value chain	80-85
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SBM-3	Significant impacts, risks and opportunities and their interaction with the strategy and business model	102-106
IRO-1	Description of the processes for identifying and assessing significant impacts, risks, and opportunities	108-111
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ESRS E1 Climate change		
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E1-5	Energy consumption and energy mix	128-129
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ESRS S1 Own Workforce		
SBM-3	Significant impacts, risks and opportunities and their interaction with the strategy and business model	150-152
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S1-5	Targets related to the management of significant adverse	184

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S4-1	Consumer and end-user policies	196-200
S4-2	Collaborative processes with consumers and end-users on impacts	201-202
S4-3	Processes to address negative impacts and channels through which consumers and end-users can voice their concerns	203-204
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ESRS G1 Business conduct		
G1-1	Corporate Culture and Policies on Business conduct and Corporate Culture	214-215
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1.4.1.2. List of data points in cross-cutting standards and thematic standards stemming from other EU legislation

Reporting requirement and related data point	Reference from SFDR	Pillar 3 Reference	Benchmark Regulation Reference	Reference from the EU Climate Law	Page Number
ESRS 2 GOV-1 Gender diversity in management bodies point 21 (d)	x		x		72
ESRS 2 GOV-1 Percentage of members of management bodies who are independent paragraph (21)(e)			x		72
ESRS 2 GOV-4 Due Diligence Process Statement Paragraph 30	x				75

Reporting requirement and related data point	Reference from SFDR	Pillar 3 Reference	Benchmark Regulation Reference	Reference from the EU Climate Law	Page Number
ESRS 2 SBM-1 Involvement in fossil fuel-related activities point 40(d)(i)	x	x	x		81
ESRS 2 SBM-1 Involvement in activities related to fossil fuels point 40(d)(ii)	x		x		81
ESRS 2 SBM-1 Involvement in activities related to controversial weapons point 40(d)(iii)	x		x		81
ESRS 2 SBM-1 Involvement in activities related to tobacco cultivation and production point 40 letter (d) iv			x		81
ESRS E1-1 Transition plan to achieve climate neutrality by 2050 paragraph 14				x	121
ESRS E1-1 Companies excluded from the application of the Paris Agreement-aligned benchmarks, point 16(g)		x	x		Not material
ESRS E1-4 Greenhouse gas emission reduction targets, paragraph 34	x	x	x		127
ESRS E1-5 Consumption of fossil energy from source-disaggregated sources (climate-intensive sectors only) paragraph 38	x				Not material
ESRS E1-5 Energy consumption and energy mix paragraph 37	x				128
ESRS E1-5 Energy intensity associated with activities in sectors with a high climate impact, paragraphs 40 to 43	x				Not material
ESRS E1-6 Gross Category 1,2,3 Emissions and Total GHG Emissions paragraph 44	x	x	x		129-137
ESRS E1-6 Gross GHG intensity paragraphs 53-55	x	x	x		129-137
ESRS E1-7 GHG removals and carbon credits paragraph 56				x	Not material
ESRS E1-8 Establishing the internal carbon price					Not material

Reporting requirement and related data point	Reference from SFDR	Pillar 3 Reference	Benchmark Regulation Reference	Reference from the EU Climate Law	Page Number
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			x		137
ESRS E1-9 Disaggregation of monetary values according to acute and chronic physical risk, paragraph 66(a), Location of significant assets that are subject to significant physical risk, paragraph 66(c)		x			Material (gradually introduced)
ESRS E1-9 Breakdown of the book value of real estate assets by energy efficiency classes point 67(c)		x			Material (gradually introduced)
ESRS E1-9 Portfolio exposure to climate-related opportunities paragraph 69			x		Material (gradually introduced)
ESRS E2-4 Quantity of each pollutant listed in Annex II of the E-PRTR Regulation (European Register of Pollutants Emitted and Transferred) emitted into air, water and soil, paragraph 28	x				Not material
ESRS E3-1 Water, and marine resources point 9	x				Not material
ESRS E3-1 Specific Policy Paragraph 13	x				Not material
ESRS E3-1 Sustainable Oceans and Seas paragraph 14	x				Not material
ESRS E3-4 Total recycled and reused water point 28(c)	x				Not material
ESRS E3-4 Total water consumption in m3 per net income from own operations paragraph 29	x				Not material
ESRS 2 - SBM 3 - E4 point 16 (a) i	x				Not material
ESRS 2 - SBM 3 - E4 point 16 (b)	x				Not material
ESRS 2 - SBM 3 - E4 point 16 (c)	x				Not material
ESRS E4-2 Sustainable Land/Agriculture Practices	x				Not material

Reporting requirement and related data point	Reference from SFDR	Pillar 3 Reference	Benchmark Regulation Reference	Reference from the EU Climate Law	Page Number
or Policies, point 24(b)					
ESRS E4-2 Sustainable Ocean/sea practices or policies, point 24(c)	x				Not material
ESRS E4-2 Policies to combat deforestation point 24 points (d)	x				Not material
ESRS E5-5 non-recycled waste point 37(d)	x				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	x				Not material
ESRS 2 - SBM3 - S1 Risk of forced labor incidents point 14 (f)	x				Not material
ESRS 2 - SBM3 - S1 Risk of child labor incidents point 14 (g)	x				Not material
ESRS S1-1 Human Rights Policy Commitments, paragraph 20	x				170-171
ESRS S1-1 Due Diligence Policies on Issues Addressed by International Labor Organization Fundamental Conventions 1-8, Paragraph 21			x		171
ESRS S1-1 processes and measures to prevent trafficking in human beings' paragraph 22	x				171
ESRS S1-1 occupational accident prevention policy or accident management system, paragraph 23	x				171
ESRS S1-3 complaint/complaint resolution mechanisms point 32(c)	x				174
ESRS S1-14 Number of fatalities and number and rate of work-related accidents point 88(b) and (c)	x		x		Not material
ESRS S1-14 Number of days lost as a result of injury, accident, death or illness Paragraph 88(e)	x				Not material
ESRS S1-16 Gender pay gap	x		x		192

Reporting requirement and related data point	Reference from SFDR	Pillar 3 Reference	Benchmark Regulation Reference	Reference from the EU Climate Law	Page Number
in unadjusted form paragraph 97(a)					
ESRS S1-16 An excessive level of ratio between the remuneration of the Director-General and that of the workers paragraph 97 (b)	x				192
ESRS S1-17 Incidents of discrimination point 103(a)	x				Not material
ESRS S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 104(a)	x		x		Not material
ESRS 2 – SBM3 – S2 Significant risk of child labor or forced labor in the value chain point 11(b)	x				Not material
ESRS S2-1 Human Rights Policy Commitments, paragraph 17	x				Not material
ESRS S2-1 Policies related to workers in the value chain paragraph 18	x				Not material
ESRS S2-1 Failure to comply with the principles of business and human rights and OECD guidelines paragraph 19	x		x		Not material
ESRS S2-1 Due diligence policies on issues addressed by International Labor Organization Fundamental Conventions 1-8, paragraph 19			x		Not material
ESRS S2-4 Human rights issues and incidents related to its upstream and downstream value chain, paragraph 36	x				Not material
ESRS S3-1 Human Rights Policy Commitments, paragraph 16	x				Not material
ESRS S3-1 Non-compliance with UN Guiding Principles on Business and Human Rights, ILO Principles and/or	x		x		Not material

Reporting requirement and related data point	Reference from SFDR	Pillar 3 Reference	Benchmark Regulation Reference	Reference from the EU Climate Law	Page Number
OECD Guidelines paragraph 17					
ESRS S3-4 Human Rights Issues and Incidents, paragraph 36	x				Not material
ESRS S4-1 Consumer and end-user policies, paragraph 16	x				199-200
ESRS S4-1 Failure to comply with the Guiding Principles on Business and Human Rights and the OECD Guidelines paragraph 17	x		x		200
ESRS S4-4 Human Rights Issues and Incidents, paragraph 35	x				208
ESRS G1-1 United Nations Convention against Corruption, paragraph 10(b)	x				214
ESRS G1-1 Protection of whistleblowers point 10 (d)	x				215
ESRS G1-4 Fines for Violation of Anti-Corruption and Anti-Bribery Laws paragraph 24(a)	x		x		220
ESRS G1-4 Anti-corruption and anti-bribery standards point 24(b)	x				221

2. INFORMATION ON MATERIAL ENVIRONMENTAL TOPICS

2.1. Climate Change

2.1.1. Strategy

Libra Internet Bank has not yet adopted a formal transition plan for climate change mitigation. As of the current reporting period, the Bank does not have GHG emission reduction targets in place, nor does it track or disclose progress toward alignment with the 1.5°C goal of the Paris Agreement. As such, there is no current strategy or defined set of actions linked to climate neutrality or Paris-aligned targets, and no related decarbonization levers or GHG-reduction activities have been identified. *(Disclosure: E1-1.14; E1-1.16a)*

There are no decarbonization levers in place, nor has the Bank identified or disclosed changes in its product and service portfolio, technological investments, or operational practices related to emissions reduction. Similarly, no actions or adjustments are reported in the upstream or downstream value chain in relation to climate mitigation. *(Disclosure: E1-1.16b)*

In the absence of a transition plan, the Bank has not allocated operational or capital expenditure (OpEx or CapEx) to actions supporting climate mitigation. There is also no reporting on taxonomy-aligned CapEx or investment planning aligned with the requirements of Commission Delegated Regulation (EU) 2021/2178. *(Disclosure: E1-1.16c)*

The Bank has not conducted a qualitative assessment of locked-in emissions associated with any of its products, services, or operational assets. Consequently, there is no evaluation of potential transition risks arising from carbon-intensive activities, nor are there plans in place to manage them. *(Disclosure: E1-1.16d)*

Given that no transition plan has been adopted, there is no integration of such a plan within the Bank's overarching business strategy or financial planning frameworks. Furthermore, there is no evidence of oversight or approval of a transition plan by the Bank's administrative, management, or supervisory bodies. *(Disclosure: E1-1.16h; E1-1.16i)*

As no plan exists, there is no progress to report on implementation, nor are there milestones, monitoring tools, or performance indicators in place to assess alignment with climate-related strategic objectives. The Bank acknowledges that this is a developing area and may be addressed in future reporting periods based on regulatory guidance, internal capacity, and data availability. *(Disclosure: E1-1.16j)*

Libra Internet Bank does not currently maintain a transition plan for climate change mitigation. This decision is based on the structure of the Bank's lending portfolio, which is concentrated in sectors such as real estate, agriculture, wholesale, and professional services. These sectors carry lower carbon intensity and are not significantly exposed to fossil fuel-related activities such as coal, oil, or gas. As such, the Bank assesses its exposure to high carbon transition risk as limited. The current environmental and social risks associated with its operations and financing activities are managed through the Environmental and Social (E&S) Policy and Procedure, which forms part of its broader ESG framework. However, following the finalization of its initial DMA, the Bank intends to reassess whether and to what extent a climate transition plan will be developed. Any future actions or targets would be based on exposures identified as significantly impacting the achievement of the 1.5°C target outlined in the Paris Agreement. In the meantime, the Bank continues to integrate environmental and social considerations into credit evaluations and risk management, in line with regulatory requirements and best practices, where feasible. *(Disclosure: E1-1.17)*

In the context of climate-related impacts and the interaction of risks and opportunities with its strategy and business model, the Bank has identified three material risk areas. Financing in carbon-sensitive sectors presents a transition risk; adaptation to climate change, particularly in agriculture and real estate, is considered a physical risk; and broader climate change mitigation activities are also seen through the lens of transition risk. These distinctions help the Bank tailor its strategic and operational responses to climate-related challenges. *(Disclosure: E1-SBM-3.18)*

The Bank conducted a qualitative analysis for the purpose of carrying out the double materiality assessment, an analysis presented to the Bank's management, which may inform its strategy and business model. This qualitative assessment covered its full operational scope, including the upstream and downstream value chain, with no exclusions. The objective was to understand how the Bank's activity affects stakeholders, as well as how the Bank may be affected by both physical and transition risks across multiple time horizons. *(Disclosure: E1-SBM-3.19a)*

The qualitative analysis took place between November 2025 and February 2026. This included evaluating potential regulatory changes (e.g., stricter carbon pricing), shifts in demand toward lower-carbon sectors, and expected technological transformations. The Bank assessed material impacts and risks across short-term (less than one year), medium-term (1–5 years), and long-term (beyond 5 years) timeframes. *(Disclosure: E1-SBM-3.19b)*

The conclusions of the analysis suggest that the Bank may face increased competitive pressures in the short term due to stakeholder expectations, expanded reporting duties, and heightened scrutiny of environmental and social impacts. These changes could lead to higher compliance costs and require additional investments under uncertain conditions. In the medium term, the Bank expects physical risks such as changing temperatures and natural disasters to affect certain loan sectors like agriculture and construction. To mitigate this, internal staff training has begun on topics such as climate change, sustainability, and the ESG risk management framework within the Bank, aimed at building internal capacity. In the long term, severe climate events such as water and temperature extremes may threaten the financial viability of certain regions and sectors. Changes in consumer preferences and stricter environmental regulations could generate challenges for existing lending segments. However, the Bank sees long-term benefits in its growing support for green finance, particularly in renewable energy, sustainable agriculture, and energy-efficient buildings, which are expected to contribute positively to its business model. (*Disclosure: E1-SBM-3.19c*)

2.1.2. Impact, Risk, and opportunity management

2.1.2.1. Description of the processes to identify and assess material climate change mitigation and adaptation-related impacts, risks and opportunities

Libra Internet Bank currently has multiple internal procedures and policies relevant to managing its material impacts, risks, and opportunities related to climate change mitigation and adaptation. These are the Double Materiality Assessment Procedure, Environmental and Social (E&S) Policy and Procedure and the Green Financing Procedure and Sustainability Lending Products. While the Bank does not explicitly label these as climate-specific policies, these documents contribute to the integration of environmental considerations, including climate change risks, into its lending operations and product design. The E&S Policy and Procedure support the identification and evaluation of environmental risks in financed sectors. The Green Financing Procedure defines criteria for sustainability-linked financial products that promote environmentally responsible investment decisions. The Double Materiality Assessment Procedure formalizes the DMA process in alignment with the ESRS requirements, including the establishment of responsible structures and the operational stages.

The Bank has a standalone climate change mitigation or adaptation policy at this stage. However, its current procedures provide a basis for embedding environmental risk assessments, and the Bank may consider the formal development of targeted climate policies as regulatory expectations and internal capabilities evolve. (*Disclosure: E1-2.24*)

Libra Internet Bank integrates climate-related considerations into lending and risk management through a structured and operationalized Environmental and Social Management System (ESMS). This system is outlined in the E&S Policy and implemented through the Environmental and Social Risk Procedure (Reporting: E1-2.24). ESMS serves as the fundamental framework for managing risks related to climate change mitigation and adaptation across all financing activities.

The ESMS applies differentiated levels of environmental and climate-related due diligence based on a risk classification matrix and a sectoral classification system, enabling the consistent identification of transactions with potential climate impact. For each client, specific due diligence questionnaires are used according to the assessed risk level.

To support climate change mitigation, the Bank has adopted a dedicated Green Financing Procedure, defining technical eligibility requirements aligned with the EU Green Taxonomy and the Loan Market Association's Green Loan Principles. This includes categories such as:

- Renewable Energy (e.g., photovoltaic solar energy, wind energy)
- Green Buildings
- Energy Efficiency
- Sustainable Agriculture and Forestry
- Clean Transport

These annexes describe technical thresholds such as minimum % renewable energy contribution, EPC benchmarks, and sector-specific efficiency improvement criteria. (Disclosure: E1-2.25).

2.1.2.2. Policies related to climate change mitigation and adaptation

E&S Policy and Procedure

The Environmental and Social (E&S) Policy and Procedure are designed to integrate environmental and social considerations into Libra Internet Bank's lending operations. Its key objectives include the identification and management of material environmental risks, such as those arising from climate change adaptation and mitigation. This includes both physical risks, such as extreme weather events, flooding, or land degradation caused by improper construction or agricultural practices, and transition risks stemming from changes in regulatory frameworks and public policies. The documents also emphasize opportunities that support the transition to a low carbon economy, such as financing energy efficient buildings, sustainable agriculture, and renewable energy projects including solar and wind. In doing so, they contribute to climate change mitigation by reducing the financed emissions footprint of the Bank's lending portfolio.

In addition, these documents address the reputational risks the Bank could face if it does not actively engage clients in climate related transitions, or if its financing practices are perceived to contradict climate objectives such as those under the Paris Agreement. Through its Environmental and Social Management System (ESMS), the Bank conducts periodic reviews of client environmental performance and integrates climate-related criteria into credit assessments. This process includes assessing both energy consumption and emissions intensity where applicable. The documents are therefore core governance instruments for managing climate adaptation and mitigation risks, promoting energy transition, and aligning the Bank's lending activities with environmental sustainability goals. (Disclosure: MDR-P 65(a))

The provisions apply to lending exposures across all economic sectors, with a particular emphasis on industries such as real estate, agriculture, and energy. The Bank does not apply geographic restrictions, and the policy is implemented throughout all jurisdictions in which the Bank operates. While they do not explicitly cover upstream supply chain activities, they focus on downstream impacts resulting from financed projects and activities. There are no specific stakeholder groups excluded from the scope of the documents. Clients and communities affected by environmental performance of financed activities are considered in the evaluation and monitoring process. (Disclosure: MDR-P 65(b))

The responsibility for implementation of the E&S Policy and Procedure lies with the Director of the Risk Management Division and the Chief Risk Officer (CRO). These documents are formally approved by the Bank's Steering Committee and endorsed by the Board of Administrators, reflecting governance-level accountability. (Disclosure: MDR-P 65(c)) The Bank does not reference or commit to any specific third-party frameworks or external environmental standards in the implementation of this policy. Instead, it relies on its internal ESMS framework to ensure that environmental risks are identified, assessed, and managed in line with internal expectations and regulatory obligations. (Disclosure: MDR-P 65(d))

In formulating the policy and the procedure, the Bank considered the interests of stakeholders, particularly clients and communities potentially affected by the environmental consequences of financed activities. Client feedback is obtained through the due diligence process, which includes the use of tailored questionnaires to assess environmental risk exposure. These inputs help ensure that the documents remain aligned with material stakeholder concerns. *(Disclosure: MDR-P 65(e))*

While the E&S Policy and Procedure are not publicly available, their application is operationalized through client-facing procedures such as environmental risk questionnaires and disclosures made during the lending process. This ensures that stakeholders who may be affected by the Bank's lending decisions, and those who support its implementation, are informed of the relevant policy expectations. *(Disclosure: MDR-P 65(f))*

Green Financing Procedure and Sustainability Lending Products

The Green Financing Procedure and Sustainability Lending Products were developed to complement Libra Internet Bank's standard lending framework by enabling targeted financing that supports climate change adaptation and mitigation objectives. The policy defines specific eligibility criteria and operational steps for granting loans through both the Bank's own resources and national or European guarantee programs. It places particular emphasis on climate change adaptation opportunities by supporting projects in construction and agribusiness that enhance climate resilience, including the financing of sustainable agricultural practices, energy-efficient farming equipment, and water-saving technologies. In terms of climate change mitigation, the policy promotes clean technology investments and the development of low-carbon infrastructure, including energy-efficient buildings and renewable energy systems, directly contributing to the energy transition. It also supports the Bank's green financing orientation by enabling lending to activities aligned with sustainable finance principles, thereby contributing positively to climate goals while offering new business opportunities through the development of sustainability-linked financial products. This framework ensures alignment with the Bank's material opportunities and supports long-term competitiveness in the evolving ESG finance landscape. *(Disclosure: MDR-P 65(a))*

The scope of the policy spans lending to all customer categories including individuals, micro-enterprises, SMEs, and small mid-caps across a broad range of sectors such as agriculture, wholesale, trade, liberal professions, and light industry. It has a specific focus on downstream activities through the evaluation of borrower environmental practices and energy performance. The policy is applied across all geographical regions where the Bank operates and places particular emphasis on the consideration of stakeholders, including borrowers and communities impacted by financed activities. However, lending to oil and gas, and similarly carbon-intensive sectors is excluded under the policy's criteria. *(Disclosure: MDR-P 65(b))*

The Head of the European Funds Division and the Bank's General Director are jointly accountable for the implementation of the Green Financing Procedure and Sustainability Lending Products. They develop the eligibility criteria, ensure internal training for the sales teams, and alongside other responsible internal divisions, ensure alignment with national and EU green financing frameworks. *(Disclosure: MDR-P 65(c))*

The policy does not currently refer to specific third-party standards or voluntary commitments but is informed by the structure and goals of EU-level sustainable finance initiatives. *(Disclosure: MDR-P 65(d))*

In terms of stakeholder considerations, the policy was designed to be used by employees involved in the credit decision-making process, who have become more familiar with sustainable finance. It therefore outlines clear steps and transparent criteria to ensure consistency and credibility. Additionally, customer communication is embedded in the policy, with the sales teams playing a central role in presenting clients with green lending opportunities. This stakeholder-oriented approach aims to promote awareness and engagement around sustainable finance and environmental performance. *(Disclosure: MDR-P 65(e))*

The policy itself is not published. However, its core concepts, including eligibility conditions and the environmental focus of the loan products, are shared with clients during product discussions and credit evaluations. These interactions allow the Bank to communicate sustainability requirements and create awareness among borrowers regarding climate-aligned financing opportunities. *(Disclosure: MDR-P 65(f))*

The Environmental and Social (E&S) Policy and Procedure addresses climate change mitigation by embedding climate risk considerations directly into the due diligence and credit analysis processes. These support investments in projects that reduce greenhouse gas emissions, including renewable energy and green buildings, and encourage sustainable practices among borrowers to lower the carbon intensity of their operations. In parallel, **the Green Financing Procedure and Sustainability Lending Products** promote mitigation through targeted financing for renewable energy projects, green and energy-efficient certified buildings, zero and low-emission mobility, and digital solutions for climate change mitigation. It also supports sustainable enterprises identified through national and EU-level guarantee agreements, whose environmentally conscious operations contribute to climate change mitigation.

Regarding climate change adaptation, the **E&S Policy and Procedure** facilitate adaptation by incorporating criteria into loan approval processes that prioritize investments which increase resilience to climate-related events. This is particularly emphasized in the real estate and agricultural sectors, where the Bank uses both qualitative and quantitative criteria to assess project resilience and vulnerability reduction. **The Green Financing Procedure** also addresses adaptation in line with eligibility criteria defined under EU guarantee programs. It includes financing for investments that enhance company or regional resilience to climate change, reduce climate vulnerabilities in agriculture, and support the adoption of digital solutions such as advanced weather monitoring systems and early warning technologies. Investments in research and innovation to improve climate adaptation are also supported.

In terms of energy efficiency, the **E&S Policy** considers the energy performance of financed projects during environmental risk assessments, ensuring that higher energy efficiency is reflected in the credit analysis process. This is further reinforced by the **Green Financing Procedure**, which explicitly targets projects that demonstrate significant improvements in energy efficiency and reductions in energy consumption.

The documents also support the deployment of renewable energy. The **E&S Policy** promotes the financing of projects implementing renewable energy technologies to reduce reliance on fossil fuels and to help lower emissions. **The Green Financing Procedure** provides further alignment with this objective by facilitating dedicated funding to solar, wind, and other low-carbon energy systems.

No additional areas beyond mitigation, adaptation, energy efficiency, and renewable energy have been identified at this time as requiring specific policy attention. Therefore, no further disclosures are applicable under *E1-2.25(e)*. The Bank confirms that it does not have any missing policy or action disclosures required under the relevant ESRS provisions. There are currently no areas for which the Bank is unable to provide information due to a lack of adopted policies or actions. As such, the provisions under *ESRS 2.62* are not applicable at this time.

2.1.2.3. Actions and resources related to climate change policies

Libra Internet Bank has not undertaken any formal climate change mitigation or adaptation actions during the reporting year, nor are there any structured actions currently planned (Disclosure: E1-3.28; MDR-A(a)). The Bank recognizes the importance of addressing climate-related risks and opportunities and intends to evaluate relevant actions after finalizing its Double Materiality Assessment. This evaluation will be guided by future regulatory developments and emergent market practices (Disclosure: *ESRS 2.62*).

As such, there are currently no expected outcomes to report, and the Bank has not implemented any actions that contribute to climate-related policy objectives or targets (Disclosure: MDR-A(a)). The Bank's current approach does not include a defined scope of action in terms of affected activities, value chain segments, geographies, or stakeholder groups (Disclosure: MDR-A(b)). No time horizons have been established for the completion of any future actions (Disclosure: MDR-A(c)), and no remediation measures have been initiated in response to material climate impacts (Disclosure: MDR-A(d)). Having had no prior action plan, the Bank does not report any progress in this regard. (Disclosure: MDR-A(e)).

No financial or other resources have been allocated to the implementation of climate-related action plans, either for the current or future periods (Disclosure: MDR-A.69(a), (b), (c)). The Bank does not currently utilize sustainable finance instruments such as green bonds or green loans to support climate change mitigation or adaptation, and the ability to implement such actions is not currently contingent upon the granting of financial support or specific policy developments (Disclosure: *E1-3.AR 21*).

At this stage, the Bank has not applied any decarbonization levers, such as renewable energy generation, operational energy efficiency measures, or nature-based climate solutions (Disclosure: E1-3.29(a); E1-3.AR 19d). Consequently, there are no achieved or expected GHG emission reductions to disclose (Disclosure: E1-3.29(b)), and no relevant expenditures (CapEx or OpEx) have been linked to the implementation of climate mitigation or adaptation actions (Disclosure: *E1-3.29(c)*; *E1-3.AR 22*). The Bank has not yet aligned its expenditures with the Taxonomy-related performance indicators under Commission Delegated Regulation (EU) 2021/2178, nor are any differences between potential CapEx/OpEx and the KPIs applicable at this stage (Disclosure: *E1-3.29(c)(i–iii)*).

The Bank confirms that, while no specific actions have been implemented for the current period, it intends to assess the feasibility of adopting concrete mitigation and adaptation measures in the future. This process will consider the availability of reliable environmental data, regulatory requirements, and financing tools that support sustainability objectives (*Disclosure: ESRS 2.62*).

Libra Internet Bank has taken initial steps toward implementing climate change mitigation and adaptation through its financing activities, particularly by initiating an expansion of its green lending portfolio. Although no structured or quantified mitigation or adaptation actions have been executed during the reporting year, the Bank has begun to operationalize mechanisms and product lines that enable targeted climate financing (*Disclosure: E1-3.28*).

The Bank's most significant current exposure in climate-related financing lies in the renewable energy sector, where several wind and solar energy projects have already been financed. These projects contribute directly to climate mitigation through clean energy production. Project-level tracking is conducted using portfolio filters, with additional oversight through client-level reporting and periodic monitoring procedures (*Disclosure: E1-3.28, E1-3.AR 21*). Although Libra Internet Bank has not yet deployed formal decarbonization levers such as energy efficiency improvements, nature-based solutions, or renewable self-generation (*Disclosure: E1-3.29(a)*), its green energy lending supports long-term emissions reduction in accordance with the objectives of the ESRS framework.

In addition to mitigation-focused lending, the Bank offers residential and real estate loan products that directly support adaptation to climate risks. These include "Credit for residential projects, including green projects" and "Credit for real-estate investments, including green investments", which finance both retrofit and new construction projects that incorporate climate-resilient design elements such as insulation upgrades, flood-resistant infrastructure, and green roofing systems. (*Disclosure: E1-3.28*).

Libra Internet Bank has developed operational frameworks for climate financing under the InvestEU Sustainability Guarantee program in collaboration with the European Investment Fund (EIF), and loans have thus been granted under this scheme during the current reporting period. These green credit products support SMEs and corporates undertaking projects in energy efficiency, sustainable mobility, and low-carbon construction. The financing model includes a credit of up to 85% of investment value, with partial risk protection between 50% and 70% secured via EIF guarantees (*Disclosure: E1-3.28*).

At this stage, no financial allocations (CapEx or OpEx) have been committed toward climate mitigation or adaptation measures (*Disclosure: MDR-A.69(a), (b), (c)*). The Bank does not currently utilize sustainable finance instruments such as green bonds, nor have emissions reduction expenditures been linked to regulatory Taxonomy KPIs (*Disclosure: E1-3.29(c), E1-3.29(c)(i-iii), E1-3.AR 22*). Furthermore, Libra Internet Bank has not yet reported any GHG emissions reduction results stemming from its own operations (*Disclosure: E1-3.29(b)*).

Although no specific mitigation or adaptation actions were implemented during the year, the Bank will continue to explore the feasibility of structured actions following the completion of the Double Materiality Assessment. Future plans may include assessing the environmental impact of lending instruments, expanding taxonomy-aligned financing tools, and aligning internal resources with evolving EU and national climate policies. The implementation of such actions will depend on the availability of reliable climate-related data, access to dedicated funding instruments, and clear regulatory guidance (*Disclosure: ESRS 2.62*).

2.1.3. Metrics and Targets

2.1.3.1. Targets related to climate change mitigation and adaptation

Libra Internet Bank has not set any greenhouse gas (GHG) emission reduction targets or other climate-related targets during the reporting period. The Bank's assessment concludes that its own operations are not materially relevant in terms of GHG emissions due to the limited scale and nature of its activities. Furthermore, the Bank's lending portfolio does not include exposure to high-emission industries such as oil and gas, heavy industry, or large-scale manufacturing, which significantly reduces the climate-related footprint of its financed activities. *(Disclosure: E1-4.32)*

Consequently, no measurable outcome-oriented targets related to climate change mitigation or adaptation have been defined at this stage. The Bank confirms that it has not established any targets across scopes 1, 2, or 3 emissions, and no targets have been adopted regarding energy efficiency improvements, renewable energy usage, or portfolio decarbonization. *(Disclosure: E1-4.33)*

As no GHG emission reduction targets have been set, the requirements under ESRS for target-related disclosures, including baseline year, methodologies, scope coverage, target levels, stakeholder involvement, or science-based alignment, do not apply. *(Disclosure: E1-4.34)*

The Bank has not yet adopted a timeline for establishing GHG-related targets but will continue to evaluate this in line with the outcomes of its Double Materiality Assessment (DMA). Should material exposures be identified in the future, the Bank will use best efforts to define appropriate climate targets aligned with regulatory developments and sustainable finance frameworks. *(Disclosure: MDR-T 81.a)*

Although no targets are in place, the Bank acknowledges the importance of tracking the effectiveness of its climate-related policies and actions. As a result, it will make every effort to monitor the progress against the identified material risks and opportunities using qualitative indicators once sufficient client-level or portfolio-level data becomes available. *(Disclosure: MDR-T 81.b)*

2.1.3.2. Energy consumption and energy mix (E1-5)

Energy consumption and energy mix	Unit of measurement	2025	2024
Fuel consumption from coal and coal-based products	MWh	0	0
Fuel consumption from crude oil and petroleum products	MWh	1,468,233	Not reported*
Fuel consumption from natural gas	MWh	225,412	Not reported*
Fuel consumption from other fossil sources	MWh	0	0
Consumption of electricity, heat, steam and cooling purchased or obtained from fossil sources	MWh	434,522	1,006
Total energy consumption from fossil	MWh	2,128,167	1,006

Energy consumption and energy mix sources	Unit of measurement	2025	2024
Share of fossil sources in total energy consumption	%	79.1%	58.4%
Consumption from nuclear sources	MWh	433.608	Not reported*
Share of nuclear consumption in total energy consumption	%	16.1%	Not reported*
Consumption of fuel from renewable sources, including biomass, biogas, biofuels, hydrogen, etc.	MWh	0	0
Consumption of electricity, heat, steam and cooling purchased or obtained from renewable sources	MWh	351,216	714
Energy consumption from renewable sources other than self-produced fuels	MWh	351,216	714
Consumption of self-generated renewable energy	MWh	0	0
Total renewable energy consumption	MWh	351,216	714
Share of renewables in total energy consumption	%	13.10%	41.6%**
Total energy consumption (sum of fossil, nuclear, renewable)	MWh	2,690,233	1,720

*For 2024, a breakdown of electricity consumption by type of primary energy source was not possible due to the absence of the electricity supplier's label. The "Not reported" values do not indicate the absence of consumption, but rather limitations related to its classification.

** In 2024, the classification of electricity consumption was based on aggregated information from the national energy mix, while in 2025 the detailed information provided by the electricity supplier was used.

Total energy was calculated by converting the raw data from joules (J) into MWh, using standard conversion factors. For the year 2024, electricity consumption was determined based on the data available from energy invoices and was reported at an aggregated level. In the absence of the electricity supplier's label, it was not possible to distinguish electricity consumption by primary energy sources (coal, natural gas, oil, nuclear, and renewable sources). Consequently, the information relating to energy consumption by type of source for 2024 is limited and is presented only where this was possible based on the available information. In 2024, there was no fuel-based energy consumption and no self-generated renewable energy consumption.

For the year 2025, electricity consumption was determined using data provided by the electricity supplier, including the energy label, which allowed for a more detailed classification of consumption by type of energy source, in accordance with the requirements of ESRs E1-5.

For these reasons, the information on the structure of the energy mix and the shares of energy sources for 2024 and 2025 are not directly comparable, with the differences being generated mainly by the change in the data source and in the level of detail available.

2.1.3.3. Gross GHG emissions of categories 1, 2, 3 and total GHG emissions (E1-6)

Scope	Type of Activity	Reference Year	Reference Year	Unit of Measurement
		2025	2024	
Scope 1	Gross Scope 1 GHG emissions (total)	433	458	tonnes CO ₂ e
Scope 1	Percentage of GHG emissions from regulated emission trading schemes (%)	0	0	-
Scope 2	Purchased electricity (location-based)	195	296	tonnes CO ₂ e
Scope 2	Purchased electricity (market-based)	188	-	tonnes CO ₂ e
Scope 2	Purchased heat and steam	35	117	tonnes CO ₂ e
Scope 2	Gross location-based Scope 2 GHG emissions	229	413	tonnes CO ₂ e
Scope 2	Gross market-based Scope 2 GHG emissions	223	117	tonnes CO ₂ e
Scope 3.1	Purchased goods and services	0	0	tonnes CO ₂ e
Scope 3.2	Capital goods	0	0	tonnes CO ₂ e
Scope 3.3	Fuel and energy-related activities (not in Scope 1 or 2)	15	353	tonnes CO ₂ e
Scope 3.4	Upstream transportation and distribution	0	0	tonnes CO ₂ e
Scope 3.5	Waste generated in operations	0	0	tonnes CO ₂ e
Scope 3.6	Business travel	48	96	tonnes CO ₂ e
Scope 3.7	Employee commuting (Estimated total)	612	650	tonnes CO ₂ e
Scope 3.8	Upstream leased assets	-	-	tonnes CO ₂ e
Scope 3.9	Downstream transportation	-	-	tonnes CO ₂ e
Scope 3.10	Processing of sold products	-	-	tonnes CO ₂ e
Scope 3.11	Use of sold products	-	-	tonnes CO ₂ e
Scope 3.12	End-of-life treatment of sold products	-	-	tonnes CO ₂ e
Scope 3.13	Downstream leased assets	-	-	tonnes CO ₂ e
Scope 3.14	Franchises	-	-	tonnes CO ₂ e
Scope 3.15	Investments*	268,496	252,042*	tonnes CO ₂ e
Scope 3	Total gross indirect GHG emissions (Scope 3)	269,171	253,141	tonnes CO ₂ e
Total	Total GHG emissions (location-based)	269,834	254,012	tonnes CO ₂ e
Total	Total GHG emissions (market-based)	269,827	253,716	tonnes CO ₂ e

* The comparative period figures for Scope 3, Category 15 Investments have been re-evaluated. Please refer to the section "Methodology for calculating financed emissions – Scope 3, Category 15 (E1-6.AR 46h)

** In the current period, the Bank calculated the market-based Scope 2 GHG emissions and for the period ending December 31, 2024.

Greenhouse gas emissions intensity based on net revenues

In accordance with ESRS E1-6.53–54 and Application Requirement AR 53, Libra Internet Bank reports its greenhouse gas (GHG) emissions intensity as the ratio between total GHG emissions (in metric tonnes of CO₂ equivalent) and net revenue (in monetary units).

The GHG intensity rate is calculated using the following formula [E1-6.53, AR 53(a)]:

GHG Intensity (tCO₂e/monetary unit) = Total GHG Emissions / Total Net Revenue

GHG emissions intensity (tCO ₂ e / million RON)	2025	2024
Location-based		
Total GHG emissions	269,835	254,012
Net revenue (individual level):	838,839,503	768,001,020
GHG intensity:	321.68	330.74*
Market-based		
Total GHG emissions	269,828	253,716
Net revenue (individual level):	838,839,503	768,001,020
GHG intensity:	321.67	330.36*

* Restated values considering the reassessment of emissions from Scope 3, Category 15 Investments. Please refer to the section "Methodology for calculating financed emissions – Scope 3, Category 15 (E1-6.AR 46h)

This value reflects the total GHG emissions arising from all relevant categories of direct and indirect emissions (Scope 1, Scope 2 and Scope 3), including "investments" (in accordance with Category 15 of the GHG Protocol and the PCAF methodology on financed emissions) – for the 2025 reporting year (as presented in E1-6.44(d) and E1-6.52), divided by the net revenues of Libra Internet Bank, which were calculated in accordance with IFRS 15 – *Revenue from Contracts with Customers* (E1-6.53(e), AR 53(e)).

Libra Internet Bank expresses this GHG intensity value in terms of tCO₂e per RON, calculated on the basis of total emissions (Scope 1 + Scope 2 + Scope 3), including indirect emissions related to lending and investment activities, namely financed emissions (Scope 3 – Category 15 under the GHG Protocol), in accordance with the PCAF methodology, as required under paragraph 53. The numerator represents total gross emissions (Scope 1 + Scope 2 + Scope 3), while the denominator represents net revenue as reported in the financial statements (E1-6.53(b)(c)(d)).

Calculation methodology for GHG emissions from own operations and supply chain

Libra Internet Bank calculates and reports its greenhouse gas (GHG) emissions in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and ESRS E1-6. The disclosures cover Scopes 1, 2, and selected Scope 3 categories, and 2025 is designated as the reference year (E1-6.52).

Scope 1 and Scope 2 Emissions

Scope 1 emissions are based on stationary combustion, mobile combustion, and fugitive emissions from refrigerants under Libra Internet Bank's operational control. Scope 2 emissions are calculated using the location-based method, which relies on national average emission factors for electricity and thermal energy production in Romania, as published by NERA (National Energy Regulatory Authority) (E1-6.AR 45d).

Average emission factors from NERA were used in the calculation of Scope 2 GHG emissions for 2025.

Methodologies, Assumptions, and Emission Factors (E1-6.AR 39b, E1-6.AR 39d)

GHG emissions have been calculated using activity-based methods combined with sector-specific emission factors. The following Global Warming Potential (GWP) rates, aligned with the most recent IPCC values, were used (E1-6.AR 39d):

- N₂O: 265 times CO₂
- CH₄: 27 times CO₂
- HFCs: 14,800 times CO₂

Libra Internet Bank calculated emission factors for 20 economic branches using data from the European Environment Agency (EEA). These were applied to client financial data and the value of business loans. Where financial data was missing, emissions were estimated using patterns from comparable clients within the same economic sector.

For project finance, emissions were estimated from publicly available data, using assumptions about equipment installation emissions in similar industries, adjusted to reflect the investment value of the bank.

For mortgage and commercial real estate (CRE) loans, when property or asset values were unavailable, Libra Internet Bank applied a global attribution factor. This factor was based on the total value of loans and the estimated value of financed and collateralized buildings. Building surface area and emission factors were sourced from EPCs or public data from MDLPA.

All calculations used official economic activity data and sector-specific emission factors (e.g., tCO₂e/€ of revenue or tCO₂e/€ of asset), in accordance with standard EEIO methodologies (E1-6.AR 39b).

Measurement of Scope 3 Emissions and Use of Primary Data (E1-6.AR 46g)

Scope 3 GHG emissions have been calculated for selected categories using internal data and external statistical sources. At this stage, primary data from suppliers or other value chain partners was not used (E1-6.AR 46g).

- Upstream activities: 100% covered
- Downstream activities: 0% covered
- Use of primary data: 0%

Scope 3 Category Inventory (E1-6.AR 46i)

Libra Internet Bank discloses the following Scope 3 categories as included or excluded, with justifications as required under (E1-6.AR 46i): Category	Status	Justification
1. Purchased goods and services	Excluded	Not relevant
2. Capital goods	Excluded	No capital goods in portfolio
3. Fuel- and energy-related activities	Included	Calculated using DEFRA emission factors
4. Upstream transportation and distribution	Excluded	Not the case
5. Waste generated in operations	Excluded	Not relevant
6. Business travel	Included	Based on internal travel data and DEFRA factors
7. Employee commuting	Included	Estimated using survey data and DEFRA factors
8. Upstream leased assets	Excluded	No leased assets
9. Downstream transportation and distribution	Excluded	Not the case
10. Processing of sold products	Excluded	Not the case
11. Use of sold products	Excluded	Not the case
12. End-of-life treatment of sold products	Excluded	Not the case
13. Downstream leased assets	Excluded	Not the case
14. Franchises	Excluded	Not the case
15. Investments	Included	Included for financed emissions

Calculation Methodology for Financed Emissions – Scope 3, Category 15 (E1-6.AR 46h)

The methodology used by Libra Internet Bank for calculating financed greenhouse gas (GHG) emissions is based on The Global GHG Accounting and Reporting Standard – Part A: Financed Emissions, Second Edition, issued by the Partnership for Carbon Accounting Financials (hereinafter referred to as the “PCAF methodology”).

This approach provides a standardized, transparent, and consistent framework through which financial institutions can assess the greenhouse gas (GHG) emissions associated with their lending and investment portfolios, which fall under Scope 3 emissions. The PCAF methodology ensures the inclusion of all relevant emissions (completeness), the application of consistent rules across financial institutions (consistency), and the clear communication of the methods and sources used (transparency).

Libra Internet Bank calculates financed emissions for the following asset classes, as defined by the PCAF standard:

- business loans
- commercial real estate
- corporate bonds
- equity
- mortgages
- sovereign
- vehicle loans

Consumer loans (secured and unsecured), exposures to municipalities, exposures to central banks, exposures to supranational entities, derivative instruments, and off-balance-sheet exposures are excluded from the calculation boundary for financed emissions, in accordance with the PCAF methodology.

For calculating financed emissions, Libra Internet Bank applies the following general formula: Emissions $\times$ Attribution Factor, where:

- Emissions represent the actual GHG emissions of the counterparties. Given the limited availability of data, most emissions are estimated based on economic activity. In limited cases where information was available, emissions directly reported by counterparties in their sustainability reports were used.
- The attribution factor determines the share of the borrower's or investee entity's emissions that is attributable to Libra Internet Bank, based on the financing provided. This factor is capped at a value of 1. It is calculated by considering the amount of a loan's exposure and dividing it by a certain measure of total value (such as property value and enterprise value for corporate loans).

Depending on the asset class, the components of the general formula are defined as follows:

Mortgage loans and commercial real estate

- Emissions are calculated by multiplying the property's surface area by the emission factor, sourced from the PCAF database of emission factors for European buildings. The emission factor depends on the country, property type, and energy performance certificate (EPC) class. Where the property area or the energy performance class is not available, an extrapolation of the areas and classes observed in the available cases is performed, at the level of each property type.
- The attribution factor is calculated as the ratio between the on-balance-sheet exposure and the value of the property at the time the loan is granted.

Sovereign exposures

- Emissions represent total country-level emissions, sourced from the European Commission's Emissions Database for Global Atmospheric Research (EDGAR).
- The attribution factor is calculated as the ratio between the on-balance-sheet exposure and the country-level GDP adjusted for purchasing power parity (GDP PPP). The GDP PPP data are sourced from the World Bank database.

Corporate loans, corporate bonds, and equity

- Emissions are calculated by multiplying the counterparty's total revenues by the average sector emissions (per million units of revenue) for the sector in which it operates. Sector-level average emissions are determined based on data published by the National Institute of Statistics (NIS). In limited cases, emissions were sourced directly from counterparties' sustainability reports.
- The attribution factor is calculated as the ratio between the on-balance-sheet exposure and EVIC (Enterprise Value Including Cash), or Total assets, depending on data availability.

Statement on the PCAF methodological deviation:

In line with our commitment to robust and transparent sustainability reporting, the Bank has adopted a deviation from the standard PCAF methodology in the calculation of financed emissions. More specifically, the Bank is currently limited to calculating Scope 1 emissions for its counterparties, using emissions data provided by the National Institute of Statistics (NIS). Consequently, Scope 2 and Scope 3 emissions are not included in the calculation of financed emissions. This approach is justified by the following considerations:

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

- Data quality and comparability issues:
Diverse reporting practices and the variable quality of emissions data for Scope 2 and Scope 3 pose significant challenges in ensuring comparability and consistency across different sectors.
- Methodological complexity:
The estimation of Scope 2 and Scope 3 emissions involves complex, often customized methodologies that require extensive data and assumptions, complicating the standardization process.
- Resource and cost constraints:
The additional resources required to collect, verify, and analyze comprehensive Scope 2 and Scope 3 data are currently disproportionate to the incremental benefit in accuracy, particularly in light of the existing data gaps.

Vehicle loans

- Emissions are calculated by multiplying the distance travelled by the vehicle by the emission level corresponding to the brand, model, registration year, and fuel type, sourced from the European Environment Agency (EEA) CO₂ emissions database. The distance travelled was set by expert judgment at 50,000 km per year.
 - Average emissions are initially selected based on the vehicle brand, vehicle model, vehicle year (year of registration), and fuel type.
 - If no allocation can be made (due to different naming conventions between the Bank's database and the European Environment Agency database), average emissions grouped by vehicle brand, vehicle year, and fuel type are allocated.
 - If no allocation can still be made, average emissions grouped by vehicle brand and fuel type are allocated.
 - If no allocation can still be made, average emissions grouped by vehicle brand are allocated.
 - If no allocation can still be made, average emissions grouped by fuel type are allocated.
 - If no allocation can still be made, average emissions grouped by vehicle year are allocated.
- The attribution factor is calculated as the ratio between the on-balance-sheet exposure and the value of the vehicle the time the loan is granted.

Data Quality Score allocation

The purpose of the Data Quality Score (DQS) is to inform users about the level of confidence they can have in the calculated financed emissions. In addition, the Bank uses the DQS to improve the overall accuracy of its emissions calculations.

The PCAF methodology classifies data into different quality levels, where, for example, reported and verified corporate emissions data would receive a better score compared to estimated or proxy emission factors.

More specifically, in the Bank's situation:

Score 1:

Allocated to corporate loans, corporate bonds, equities, and project finance asset classes, where audited emissions reported directly by counterparties in their sustainability reports (or via Bloomberg/Refinitiv) were used. This score is not currently applicable.

Score 2:

Sovereign asset class, where emissions reported in accordance with EDGAR were used. Corporate loans, corporate bonds, equities, and project finance asset classes, where unaudited emissions reported directly by counterparties in their sustainability reports were used. This score is not currently applicable.

Score 3:

Mortgage loans and commercial real estate asset classes, where average emission factors based on actual floor area and EPC rating were used (i.e. data available in the Bank's systems / databases).

Score 4:

Business loans, corporate bonds, equity asset classes, and project finance, where national proxies were used (i.e. industry emission intensities according to the National Institute of Statistics - NIS).

Score 5:

Auto loans, where an estimation of average emissions per motor vehicle is performed due to limited data availability (in particular, expert-based assumptions regarding the distance travelled by vehicles);
Business loans, corporate bonds, equities, and project finance asset classes, where the fallback option was applied due to missing or incomplete financial data of counterparties;

Mortgage loans and commercial real estate asset classes, where average emission factors based on estimated (assumed) floor area and missing EPC ratings were used (i.e. incomplete data available in the Bank's systems / databases).

Below is a breakdown of Libra Internet Bank's financed emissions for the years 2025 and 2024, calculated according to the PCAF methodology for Scope 3, Category 15:

2025				
PCAF Category	Exposure (RON)	Financed Emissions (tCO ₂ e)	Intensity (tCO ₂ e/million RON)	Average Data Quality Score (1–5)
Business Loans	5,770,516,498	199,910	34.64	4.21
Commercial Real Estate	1,348,216,484	12,818	9.50	5.12
Corporate Bonds	192,959,345	205	1.06	4.00
Equity	31,197,710	66	2.12	4.00
Mortgages	523,428,091	1,488	2.84	4.76
Sovereign	2,167,547,384	53,858	24.85	2.00
Vehicle Loans	20,975,761	152	7.26	5.00
Total	10,054,841,273	268,497	26.70	4.16

2024*				
PCAF Category	Exposure (RON)	Financed Emissions (tCO ₂ e)	Intensity (tCO ₂ e/million RON)	Average Data Quality Score (1–5)
Business Loans	4,624,177,867	193,737	41.90	4.20
Commercial Real Estate	1,308,764,892	10,121	7.73	5.17
Corporate Bonds	164,425,413	179	1.09	5.10
Equity	30,276,433	104	3.44	5.10
Mortgages	565,038,748	1,697	3.00	5.02
Sovereign	1,806,005,120	45,988	25.46	2.00
Vehicle Loans	31,992,875	216	6.76	5.00
Total	8,530,681,348	252,042	29.55	4.51

**During the reporting period, the Bank reviewed the comparative information on financed emissions for the period ended 31 December 2024, as a result of the implementation of a revised calculation methodology. In accordance with ESRS 1, Section 7.1 – Presentation of comparative information, the Bank recalculated the related emissions and intensities, and the comparative figures were adjusted to ensure comparability with the current period.*

Restated values for Category 15 – Scope 3, as of 31 December 2024

PCAF Category	Reported exposure (RON)	Restated exposure (RON)*	Difference	Reported financed emissions (tCO ₂ e)	Restated financed emissions (tCO ₂ e)*	Difference	Reported intensity (tCO ₂ e/mil. RON)	Restated intensity (tCO ₂ e/mil. RON)*	Difference
Business Loans	3,914,292,837	4,624,177,867	(709,885,030)	169,943	193,737	(23,794)	43.42	41.90	1.52
Financed Projects	177,103,537	-	177,103,537	16,769	-	16,769	94.68	0.00	94.68
Commercial Real Estate	2,591,925,131	1,308,764,892	1,283,160,239	26,201	10,121	16,080	10.11	7.73	2.38
Corporate Bonds	0	164,425,413	(164,425,413)	-	179	(179)	0.00	1.09	-1.09
Equity	0	30,276,433	(30,276,433)	-	104	(104)	0.00	3.44	-3.44
Mortgages	585,337,682.00	565,038,748	20,298,934	2,031	1,697	334	3.47	3.00	0.47
Sovereign	1,768,308,148.49	1,806,005,120	(37,696,972)	42,524	45,988	(3,464)	24.05	25.46	-1.41
Vehicle Loans	0	31,992,875	(31,992,875)	-	216	(216)	0.00	6.75	-6.75
Total	9,036,967,335	8,530,681,348	506,285,987	257,467	252,042	5,425	28.49	29.55	-1.05

Reporting Period and Boundary Consistency (E1-6.AR 42c, E1-6.47)

There were no discrepancies in reporting periods across the value chain. Libra Internet Bank did not use GHG data from entities with differing reporting periods (E1-6.AR 42c). No changes occurred in the reporting boundary or value chain that would affect year-on-year comparability of reported emissions (E1-6.47).

2.1.3.4. Anticipated financial effects from climate change and adaptation-related impacts, risks and opportunities

At this stage, Libra Internet Bank has not yet quantified the anticipated financial effects of material physical and transition climate risks in monetary terms due to the complexity of these issues, evolving regulatory requirements, and the current unavailability of reliable client-level data. Nevertheless, qualitative assessments have been conducted to evaluate the potential impacts across the Bank's operations and portfolio, as part of its Double Materiality Assessment (Disclosure: E1-9.66, E1-9.67).

Although no portion of these materially exposed assets has yet been addressed through dedicated adaptation measures, the Bank intends to revisit this issue in future cycles (Disclosure: E1-9.66b). Similarly, no precise geographic mapping or net revenue attribution is available at this stage, but qualitative information suggests that key revenue lines associated with real estate and agriculture could be materially affected (Disclosure: E1-9.66d).

Although the Bank has not yet taken adaptation or mitigation actions to address these transition risks, it plans to revisit this in future cycles. No liabilities are currently expected in the short-, medium-, or long-term from these exposures, and no reconciliations to financial statements have yet been prepared (Disclosures: E1-9.67b, E1-9.67d, E1-9.68a, E1-9.68b). Additionally, no estimates are currently available regarding potentially stranded assets (Disclosure: E1-9.AR 73a) or cost savings from mitigation/adaptation measures (Disclosure: E1-9.69a), nor has the Bank projected market size or revenue potential from climate-aligned products or services at this time (Disclosure: E1-9.69b).

None of the energy consumption data for the Bank's real estate portfolio is based on internal estimates; all values are sourced from official certificates and external evaluations (Disclosure: E1-9.AR 73b). The Bank tracks the energy-efficiency class of real estate assets in its portfolio and uses this classification as a basis for assessing transition risk exposure. Assets with lower energy efficiency ratings are flagged as vulnerable to market devaluation and regulation-driven cost increases. Those with high energy performance are considered more resilient to transition risks (Disclosure: E1-9.67c).

As part of its phased approach, Libra Internet Bank intends to enhance its financial modelling, integrate quantitative metrics over the next two reporting periods, and incorporate more granular geographic and revenue-based analyses of climate risks in alignment with evolving ESRS expectations (Disclosure: ESRS 2.62).

2.2. Water and marine resources**2.2.1. Strategy**

Water is a fundamental and increasingly scarce resource that supports environmental balance, economic resilience, and social well-being. As part of the Bank's approach to environmental stewardship, this chapter addresses how its activities impact, depend on, and respond to issues related to water and marine resources.

While the Bank's direct operational water footprint is limited due to its service-based nature, its most significant influence on water and marine ecosystems occurs through its financing activities, particularly in water-intensive sectors such as agriculture, construction, and real estate. These sectors face substantial physical risks, including water scarcity, contamination, and flooding.

This chapter details the Bank's methodologies and processes for identifying and assessing water- and marine-related risks and opportunities, including reliance on expert consultations and internal sustainability reviews. The Environmental and Social Risk Management System (ESMS) is used as a primary due diligence tool, integrating environmental risk assessments into the credit evaluation process. While granular water usage data at the client level remains limited, the Bank applies industry-specific assumptions to screen portfolios and identify potential high-impact activities.

Currently, the Bank has not set specific quantitative targets or developed dedicated action plans related to water and marine resources. However, it acknowledges the strategic importance of these issues and is committed to improving its monitoring and policy integration.

By continuing to enhance its data quality, risk screening practices, and stakeholder engagement, the Bank seeks to mitigate water-related risks and support long-term value creation. This includes exploring future opportunities in sustainable finance, such as loans for water-efficient technologies in agriculture and infrastructure.

2.2.2. Impact, Risk and Opportunity management

2.2.2.1. Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

Libra Internet Bank has established a qualitative process to identify and assess material impacts, risks, and opportunities related to water and marine resources. The process focuses on both the Bank's own operations and critical downstream segments of its value chain, particularly within its financing activities. Given the limited direct operational water footprint of the Bank, the assessment prioritizes the identification of water-related risks within the loan portfolio, especially in sectors known to be water-intensive such as agriculture and real estate. Because obtaining detailed client-level water consumption data remains a challenge, the Bank's analysis is based primarily on qualitative data and expert understanding of industry-level water dependency.

The screening process applies to the Bank's internal operations, where water usage is minimal and routinely monitored, as well as downstream financing activities. For clients operating in sectors with a potentially higher water consumption, the Bank relies on a combination of expert judgment, internal operational reviews, and sector-based assumptions to estimate potential impacts. These assumptions are drawn from public information and industry best practices, supported by internal qualitative assessments and risk exposure evaluations that underpin the Double Materiality Assessment.

While no direct consultations with affected communities were undertaken during the reporting period, the Bank incorporated internal expertise and external consultation into its water-related materiality screening. Internal consultations involved team members from Sales, Risk, and Sustainability, who provided qualitative insights into the Bank's exposure to water-related risks through client relationships. Additionally, external ESG consultants were engaged to validate the findings and ensure alignment with market standards. These insights were incorporated into the final assessment framework to supplement gaps in quantitative client data and support informed decision-making.

The Bank has screened its assets and relevant downstream activities to identify water and marine resource-related risks and opportunities. This process included internal reviews, expert assessments conducted by Bank staff, and was based on reasonable assumptions informed by the nature of the sectors financed. The Bank considered loan exposures for water intensive activities - particularly agriculture projects, especially those located in geographic areas subject to water scarcity (e.g. S-E Romania), along with real estate projects. (*Disclosure: ESRS IRO-1.8(a)*)

During the reporting period, the Bank did not conduct direct consultations with affected communities. However, internal teams and external consultants were consulted to provide qualitative input, ensuring a reasonable and context-aware assessment in the absence of granular stakeholder engagement. *(Disclosure: ESRS IRO-1.8(b))*

2.2.2.2. Policies related to water and marine resources

E&S Policy and Procedure

Libra Internet Bank has adopted an Environmental and Social (E&S) Policy and Procedure to manage the material risks and impacts identified also in relation to water and marine resources by integrating environmental considerations directly into its lending framework. The general objectives of the policy are to identify, evaluate, and mitigate water-related environmental and social risks by embedding due diligence processes throughout the credit cycle. This includes attention to both physical risks (e.g., water scarcity, flooding, or pollution) and transition risks (e.g., regulatory changes or shifts in societal expectations), particularly in connection with climate change. These risks are addressed through environmental and social due diligence, which includes client questionnaires, documentation review, and, where necessary, on-site assessments. The policy ensures that water-related issues are identified early in the credit assessment process, helping the Bank manage its exposure to disruptions that may affect client repayment capacity. In terms of environmental impact, the policy accounts for the potential consequences of excessive water consumption by requiring borrowers to disclose relevant permits and consumption data when available, thus encouraging more sustainable practices. Additionally, the policy anticipates reputational and regulatory risks linked to water use by maintaining a flexible screening process that considers policy changes and public perception shifts. While it does not currently include sector-specific thresholds or third-party benchmarks, the policy allows for stakeholder input, particularly through feedback mechanisms embedded in the client engagement process. In this way, the E&S Policy and Procedure serve as comprehensive governance tools to manage the identified water-related risks and impacts across the Bank's financing activities. *(Disclosure: MDR-P 65(a))*

The policy is applied to all of the Bank's lending activities across economic sectors and does not exclude any geographies. It is primarily focused on downstream impacts—those associated with clients' operations, projects, or financed assets that may interact with water resources. *(Disclosure: MDR-P 65(b))*

To implement the policy, the Bank uses a risk-based screening process. It performs qualitative risk assessments based on internal expertise and publicly available environmental data, especially where client-level quantitative data is not available. Clients operating in higher-risk sectors are required to complete environmental questionnaires that request information on water permits, consumption levels, and environmental practices. In certain cases, site visits are carried out to validate client responses. *(Disclosure: MDR-P 65(a))*

The Head of the Risk Management Division, together with the Chief Risk Officer (CRO), are responsible for overseeing the application of the policy. The E&S Policy is approved by the Bank's Steering Committee and endorsed by the Board of Administrators as well, ensuring that responsibility lies at the highest level of governance. *(Disclosure: MDR-P 65(c))*

While the policy does not currently reference or commit to external third-party standards such as the Equator Principles or IFC Performance Standards, its design is aligned with market practices and is regularly updated to reflect regulatory developments. *(Disclosure: MDR-P 65(d))*

The policy considers the interests of stakeholders, particularly clients and indirectly affected communities. During the due diligence process, clients are requested to disclose water-related environmental risks and their mitigation strategies. Internal assessments and input from external environmental consultants supplement this stakeholder input, ensuring relevance and materiality of the issues considered. *(Disclosure: MDR-P 65(e))*

Although the full policy is not publicly available, its requirements are communicated to the relevant clients through the due diligence process within the lending activity. Clients receive access to the necessary environmental questionnaires and are informed of the Bank's expectations regarding environmental compliance, including those relating to water resources. *(Disclosure: MDR-P 65(f))*

For projects with expected water-intensive operations, such as irrigation systems in agriculture or infrastructure projects with significant water needs, the Bank collects water-related data via sector-specific questionnaires and, when needed, onsite assessments. This ensures that water consumption and resource efficiency are considered in the financing application analysis process. *(Disclosure: E3-1.12b)*

The Bank currently has no formal commitments or defined targets related to reducing water consumption, either within its own operations or throughout its value chain. Water consumption reduction is currently not embedded as an organizational objective. *(Disclosure: E3-1.12c)*

2.2.2.3. Actions and resources related to water and marine resources

No key actions related to water and marine resources were taken by the Bank during the reporting year, nor are any planned. As such, there are no defined outcomes, and no implementation efforts are in place to support policy objectives or targets in this area. *(MDR-A 68(a))*

Given the absence of current or planned actions, there is no applicable scope in terms of activities, value chain segments, geographies, or affected stakeholder groups. No time horizons have been established for the completion of any water-related actions. *(MDR-A 68(b)(c))*

Similarly, no remedial actions have been taken or supported for addressing adverse material impacts related to water or marine resources, and there is no progress to report from any previously disclosed action plans. *(MDR-A 68(d)(e))*

Regarding financial planning and allocation, no operational or capital expenditures have been allocated for the implementation of water-related action plans. The Bank does not currently utilize sustainable finance instruments such as green bonds or social bonds for water-specific objectives, and implementation of any such initiatives is not contingent on financial support or regulatory developments at this time. *(ESRS 2 MDR-A 69(a)(b)(c))*

The Bank does not currently implement targeted actions or allocate resources to address issues in areas of water risk, including regions classified as having high-water stress. *(Disclosure: E3-1.19)*

Although the Bank has adopted a general Environmental and Social (E&S) Policy that references water-related impacts, it currently does not maintain standalone policies or actions specifically targeting water withdrawals, consumption, or use. The Bank intends to evaluate the introduction of specific actions and associated policies in future periods, conditional upon the availability of reliable client-level data and alignment with evolving market and regulatory expectations. *(ESRS 2.62)*

2.2.3. Metrics and Targets

Libra Internet Bank has not set any measurable, outcome-oriented, or time-bound targets related to water or marine resources for the current reporting period, as such there is currently no relationship between policy objectives and target-setting processes, nor are there any metrics in place to monitor performance against such targets. (E3-3.20) Consequently, the Bank has not disclosed any details on baseline values, measurement units, milestones, geographic scope, or stakeholder involvement in relation to water or marine resource targets. (MDR-T.80(a-j))

No targets currently exist that relate to the management of material impacts, risks, or opportunities concerning areas at water risk or high-water stress, nor have any targets been set regarding the reduction of water consumption or the improvement of water quality. (E3-3.23(a), E3-3.23(c))

The Bank confirms that no water or marine resources-related targets are required by legislation or regulatory mandate, and no voluntary targets have been adopted at this stage. (E3-3.25)

Although no targets have been formally established, the Bank has committed to assessing, on a best effort basis, the feasibility of setting measurable targets in the future. This process will depend on the availability of more reliable and granular client-level data and will align with emerging market standards and regulatory guidance. (ESRS 2.81(a))

Therefore, no processes, ambition levels, or qualitative or quantitative indicators are currently established to track the effectiveness of water or marine-related policies and actions. (ESRS 2.81(b))

2.2.3.1. Anticipated financial effects from water and marine resources-related impacts, risks and opportunities

At this stage, Libra Internet Bank has not quantified the anticipated financial effects of water and marine resources-related risks and opportunities in monetary terms. This is due to the complexity of the topic, the evolving nature of regulatory and market conditions, and the current unavailability of consistent, reliable client-level data related to water consumption, efficiency, and pollution. Nevertheless, qualitative assessments have been conducted to evaluate potential impacts across the Bank's portfolio and operations. (Disclosure: E3-5.33a)

In terms of risks, the Bank has identified several material exposures. Physical risks include water scarcity and pollution, particularly relevant in sectors such as agriculture and real estate. These risks may lead to operational disruptions, decreased land and asset values, and, in turn, increased credit risk for financed clients. For example, in agriculture, reduced water availability may affect crop yields, profitability, and loan performance. In real estate, water-related events like flooding or droughts could impact property values in vulnerable areas. These physical risks are expected to materialize primarily over the medium term. (Disclosure: E3-5.33b)

Transition risks relate to the expected tightening of environmental regulations concerning water efficiency and pollution control. Sectors such as agriculture and construction may face increased compliance costs or be required to adapt to new industry standards. These risks are likely to unfold over the longer term, in alignment with evolving EU and national water management policies. (Disclosure: E3-5.33b)

Due to the absence of quantifiable financial data, the Bank has not established a modelling framework or identified critical assumptions that would enable a robust projection of financial effects. The main barriers include lack of standardized water-related data across sectors, particularly in agriculture, and the absence of sector-specific benchmarks at national or EU level. Additionally, there is considerable uncertainty regarding the future policy environment, technological advancements, and timing of climate-related impacts on water availability. These limitations have constrained the Bank's ability to establish reliable forward-looking estimates. (*Disclosure: E3-5.33c*)

2.3. Submission of information pursuant to Article 8 of Regulation 2020/852 (EU Taxonomy Regulation)

2.3.1. Legislative framework

Regulation (EU) 2020/852, adopted by the European Parliament and Council on 18 June 2020 (hereinafter referred to as the EU Taxonomy Regulation), establishes a comprehensive framework to facilitate sustainable investment. The purpose of this Regulation is to define the criteria necessary to assess whether an economic activity can be considered environmentally sustainable, in line with the principles of the European Green Deal. Article 8 of Delegated Regulation (EU) 2020/852 also details the specific reporting obligations for entities subject to the Corporate Sustainability Reporting Directive (CSRD).

The legislative framework of the EU Taxonomy has evolved significantly over the period 2021–2026. Commission Delegated Regulation (EU) 2021/2178 established, for the first time, detailed reporting requirements pursuant to Article 8 of Regulation (EU) 2020/852, introducing key performance indicators and the distinction between taxonomy-eligible and taxonomy-aligned activities. Subsequently, through delegated acts adopted between 2021 and 2023, the taxonomy framework was expanded by defining the technical screening criteria for all six environmental objectives, resulting in increased granularity and complexity of reporting. Commission Delegated Regulation (EU) 2026/73 marks a stage of maturation of the framework by introducing simplification measures, materiality thresholds, and methodological clarifications, with the aim of reducing the reporting burden and improving the practical applicability of the EU Taxonomy for financial institutions.

Reporting according to EU Taxonomy requirements by Libra Internet Bank shall be carried out in accordance with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council, which establishes a framework for facilitating sustainable investment (EU Taxonomy Regulation), as well as the associated Delegated Regulation ((EU) 2021/2178) on reporting requirements. For credit institutions, this reporting obligation takes the form of a key performance indicator, known as the Green Asset Ratio (GAR). The aim of this performance indicator is to increase transparency and accelerate the transition to a sustainable economy.

Thus, for the financial year which was finalized on 31 December 2025, Libra Internet Bank maintains its reporting approach of the results related to the EU Taxonomy in line with the practice applied in the previous year, with the expectation that, overtime, it will initiate the necessary steps for alignment with the amendments introduced by the Omnibus Directive.

For an economic activity to be eligible, it must be present in at least one of the six environmental activities described in the EU Taxonomy delegated acts, regardless of whether it fulfils all the technical screening criteria set out in those acts or ultimately qualifies as sustainable (aligned). The six environmental objectives are:

1. Climate change mitigation
2. Adaptation to climate change
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

Next, for an eligible economic activity to be considered aligned (sustainable), it must:

- contribute substantially to one or more of the six environmental objectives (the substantial contribution criteria) without causing significant harm to any of the other environmental objectives (the 'do no significant harm' principle (DNSH)) and, at the same time,
- comply with international minimum guarantees for human rights and labor rights (minimum guarantees).

The specific criteria (Technical Examination Criteria (TSC)) for the two climate objectives with regard to climate change mitigation and adaptation are set out in Delegated Regulation (EU) 2021/2139 (hereinafter referred to as the "Climate Delegated Act"), and for the other four environmental objectives in Delegated Regulation (EU) 2023/2486 (referred to as the "Environmental Delegated Act") and Commission Delegated Regulation (EU) 2022/1214 (referred to as the "Complementary Climate Delegated Act"). We note that the tables containing the quantitative information required for reporting can be found in the annexes at the end of this document.

2.3.2. Reporting perimeter

In accordance with Delegated Regulation 2021/2178, Annex V, Section 1.1.1, credit institutions are required to report Green Asset Ratio (GAR) key performance indicators (KPIs) based on their area of prudential consolidation. Given the Bank's operating context, the GAR ICPs reflect the information pertaining to the entire prudential perimeter of consolidation. In this context, Libra Internet Bank does not include in its prudential consolidation perimeter any entity.

For the purpose of ensuring compliance with the applicable reporting requirements, the key performance indicators related to the Green Asset Ratio (GAR) present the results both in relation to turnover and to capital expenditure (CapEx).

The key performance indicators related to the Green Asset Ratio (GAR) are established both on the basis of the stock of exposures existing at the reporting reference date (namely the reporting carried out in 2026, for the end of the financial year on 31 December 2025) and on the basis of flow. The flow component takes into account the gross carrying amount of newly generated exposures, namely new loans and advances, debt securities, and equity instruments, corresponding exclusively to exposures newly created in the year preceding the reporting reference date, without deducting loan repayments or sales of debt securities or equity instruments made during the same period.

At the same time, Libra Internet Bank complies with the sector-level reporting requirements, taking into consideration both turnover and capital expenditures (CapEx).

With regard to the reporting of the key performance indicator (KPI) related to fee and commission income arising from services other than lending and asset management, the Bank applies the QuickFix provisions, choosing not to report the KPI on fee and commission income from services other than lending and asset management for the financial year ending on 31 December 2025.

The Bank reported the EU Taxonomy templates for Credit Institutions in accordance with Delegated Act (EU) 2178/2021, prior to its amendment by Commission Delegated Regulation (EU) 73/2026, Annex V, Annex VI and Annex XI, for the year ended 31 December 2025 and in accordance with paragraph (23) of Commission Delegated Regulation (EU) 73/2026. The Bank opted to defer the disclosure of Template 6 – the key performance indicator (KPI) on fees and commissions, provided for by Commission Delegated Regulation (EU) 2178/2021, in accordance with Commission Delegated Regulation (EU) 73/2026, paragraph (7), for the financial year ended 31 December 2025. Furthermore, the Bank's trading portfolio is reported at zero value as at the reporting date of 31 December 2025; therefore, the Bank does not disclose information related to the key performance indicator (KPI) for the trading portfolio.

2.3.3. Calculation of key performance indicators: Green Asset Ratio (GAR)

The Green Asset Ratio (GAR) was calculated as a percentage of assets considered to be aligned, according to the EU Taxonomy, of the total assets covered by the GAR.

$$\text{Green Asset Ratio (GAR)} = \frac{\text{Assets deemed to be Aligned}}{\text{Total GAR Assets}}$$

The numerator of the fraction includes exposures to financial and non-financial entities that are subject to the reporting obligation under the CSRD, as well as households, local authorities, and collateral obtained through real estate transactions, all of which are considered aligned.

The denominator, representing the Total Assets covered by the GAR, includes all loans and advances, debt securities, shares, collateral taken over and other assets on the balance sheet, excluding exposures to central governments and supranational issuers, central banks and assets included in the trading book.

The calculation of KPIs for off-balance sheet exposures includes financial guarantees (FinGuar) provided by the Bank, as well as the assets under management (AuM). For the latter, the Bank reports zero exposure

For the fiscal year ended **December 31, 2025**, Libra Internet Bank reports a **GAR, stock**, of both **Turnover** and **Capital Expenditures (CapEx)** of **0%**.

Reference date for the provision of information, December 2025 (T)		Total environmentally sustainable assets	KPI Turnover****	KPI CapEx*****	Coverage (%) (of total assets)***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]
Main KPI	Green Asset Ratio (GAR) – stock	0.00	0.00%	0.00%	64.34%	93.48%	35.66%

Reference date for the provision of information, December 2025 (T)		Total environmentally sustainable assets	KPI Turnover	KPI CapEx	Coverage (%) (of total assets)	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]
Additional KPIs	GAR (flow-based)	0	0%	0%	100%		
-	Trading Portfolio*						
-	Financial guarantees	0	0%	0%			
-	Assets under management						
-	Fee and commission income**						

Reference date for the provision of information, December 2024 (T-1)		Total environmentally sustainable assets	KPI Turnover****	KPI CapEx*****	Coverage (%) (of total assets)***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]
ICP principal	Green Asset Ratio (GAR) – stock	0	0.00%	0.00%	62.79%	92.45%	37.21%

Reference date for the provision of information, December 2024 (T-1)		Total environmentally sustainable assets	KPI Turnover	KPI CapEx	Coverage (%) (of total assets)***	% of assets excluded from the GAR numerator [Article 7(2) and (3) and Section 1.1.2 of Annex V]	% of assets excluded from the GAR denominator [Article 7(1) and Section 1.2.4 of Annex V]
Additional KPIs	GAR (flow-based)	0	0%	0%	100%		
-	Trading Portfolio *						
-	Financial guarantees	0	0%	0%			
-	Assets under management						
-	Fee and commission income **						

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

**Fee and commission income derived from services other than lending and asset management.

Institutions shall provide forward-looking information on these KPIs, including information on the targets pursued, together with relevant explanations regarding the methodology applied

*** Percentage of assets covered by the KPIs in the banks' total assets.

****Based on the counterparty turnover KPI.

*****Based on the counterparty CapEx KPI, except for lending activities, for which, in the case of general-purpose lending activities, the counterparty turnover KPI is used.

Note 1: In all reporting templates, cells shaded in black are not reported.

Note 2: The KPIs on fees and commissions (Template 6) and on the trading portfolio (Template 7) apply only as from 2028.

The 0% alignment level reflects the fact that, during the reporting period, the Bank has not implemented operational processes and controls that would enable the collection and assessment of the information required to determine alignment with the EU Taxonomy for retail exposures, including mortgage loans, in accordance with the applicable requirements. Regarding the corporate portfolio, the Bank does not hold exposures to entities that, under the applicable regulatory framework, are required to report information on alignment with the EU Taxonomy.

Detailed information, in accordance with the reporting requirements of Commission Delegated Regulation (EU) 2021/2178, is presented in Chapter 5. Annexes to this report.

The methodology used to determine the eligibility and alignment of exposures reported in the GAR numerator.

The methodology implemented to ensure the correct identification of eligibility and alignment percentages is adapted to each business line managed by the Bank and listed in the EU Taxonomy legislation under the category "GAR - Assets covered in both numerator and denominator".

This category includes loans to corporations (financial and non-financial enterprises), loans to households, loans to local authorities and collateral obtained through ownership: residential and commercial real estate.

Loans to corporate clients (both financial and non-financial enterprises)

For lending activities to clients in the corporate segment, the assessment shall be based on the eligibility and alignment information provided by the client in its reporting, in accordance with the requirements of the EU Taxonomy. With this approach, considering current regulations, loans granted to small businesses that are not required to report as per CSRD will be included in the total assets covered by the GAR only in the denominator, without being able to be counted in the numerator as sustainable activities. As such, the end result will reflect a lower GAR KPI. Also, the data on the alignment of the funded entity will inevitably be delayed by one year, as it reflects the eligibility and alignment status of the previous reporting year.

The Bank has used national legislation, in particular OMFP 85/2024 and NBR Order 1/2024, in the process of identifying its institutional clients, who are under the obligation to report, in accordance with the requirements of the EU Taxonomy:

- For non-financial corporations, according to the OMFP 85/2024 criteria:
 - o The entity is in the public interest.
 - o The entity has an average number of employees > 500.
 - o The entity meets at least 2 of the following 3 criteria: Net turnover > RON 50 million, total assets > RON 25 million, average number of employees > 50.
- For financial companies, according to the criteria of NBR Order 1/2024:
 - o The entity has an average number of employees > 500.
 - o The entity meets at least 2 of the following 3 criteria: Net turnover > 250 million lei, total assets > 125 million, average number of employees > 250.

Loans to retail customers (households)

In the case of mortgage loans to retail customers, all exposures to individuals who have brought residential real estate as collateral are considered eligible. This approach is due to the fact that the specificity of these loans is included in the EU Commission Delegated Regulation (EU) 2021/2139 on climate change, under activities 7.7 Acquisition and ownership of buildings and 7.1 Construction of new buildings. In particular, the Bank assessed that all retail loans secured by residential real estate have a 100% eligibility in relation to the environmental objective of climate change mitigation.

As regards the alignment demonstration, the Bank is currently in the process of developing a methodology and a dedicated operational framework for collecting and reporting relevant data, with a view to performing alignment assessments in future reporting exercises. The procedures envisaged will include the application of a structured three-level test, in accordance with the applicable legal requirements, having as core elements the components set out in the Technical Examination Criteria, namely the substantial contribution, the principle of "Do No Significant Harm" (DNSH) and Minimum Social Safeguards.

As regards loans for vehicles and those intended for property renovation, the Bank does not currently monitor them separately. They are included in the total exposure for the Household component of the GAR reporting template, together with other categories of loans to households considered as consumer loans. The definition of the reporting category 'Households' in the Annex 'ANNEX XL – Instructions for carrying forward ESG risks, EBA instructions for supplementing GAR tables, as well as the definition in Implementing Regulation (EU) No 2021/451' has been used.

Loans to Local Authorities

Given the lack of detailed information on the sustainable use of funds, exposures resulting from local government financing were excluded from both the numerator and the denominator of the GAR. They were reported under the category "Central governments and supranational issuers" as part of the total assets, but outside the assets covered by the GAR, according to the clarification notes published by the EU Commission on the EU Taxonomy.

Guarantees obtained by taking possession of residential and commercial real estate.

As regards the methodology applicable to collateral acquired as a result of taking possession of residential and commercial immovable property, it is aligned with the methodology used for mortgage loans.

Categories of assets excluded from the numerator of the GAR, considered in the denominator

Companies that are not subject to CSRD reporting

Exposures related to the financing of entities that do not fall under the reporting obligations laid down by the CSRD Directive have been excluded from the eligibility assessment of economic activities under the EU Taxonomy. These exposures are not included in the numerator of the Green Asset Ratio (GAR), while still being reflected in the denominator. The respective entities are either established in the European Union but are not within the EU Taxonomy's current scope of application from the perspective of reporting obligations, or they are established outside the European Union, not operating in a 'Member State'.

Other categories of assets excluded from the numerator of the GAR, but considered in the denominator:

The following categories were excluded from the numerator but accounted for in the denominator: Derivatives, Interbank Loans on Demand, Cash and Cash-Related Assets, Other Asset Categories.

Categories of assets excluded from the calculation of the GAR

Assets that are not included in the calculation of the GAR are excluded from both the numerator and the denominator. Specifically, they include exposures to central governments and supranational issuers, exposures to central banks and exposures associated with the trading book.

2.3.4. Transition activities included in the reporting under the EU Taxonomy – Nuclear energy and fossil fuels

Commission Delegated Regulation (EU) 2022/1214, adopted on 9 March 2022, sets out the criteria for economic activities associated with the generation of energy from natural gas and nuclear power plants, recognizing them in the EU Taxonomy as transitional activities. Nuclear energy is classified as 'low carbon' and is subject to strict environmental and safety regulations, respecting the principle of not causing significant harm, thus contributing to the transition to climate neutrality. As for the generation of electricity from natural gas, it is considered less polluting compared to other sources such as coal. The activities referred to in the Delegated Act on nuclear energy and gaseous fuels include:

Nuclear energy:

- Pre-commercial stages of advanced technologies for the production of energy from nuclear processes with a minimum of waste generated by the fuel cycle.
- Construction and safe operation of new nuclear power plants, for the production of electricity or heat, including for the production of hydrogen, using the best available technologies.
- Generation of electricity from nuclear energy in existing installations.

Energy from fossil fuels:

- Electricity production from gaseous fossil fuels
- High-efficiency cogeneration of thermal energy for heating/cooling and electricity based on gaseous fossil fuels.
- Production of thermal energy for heating/cooling from gaseous fossil fuels in an efficient district heating and cooling system.

For the purpose of reporting according to the requirements set out in Commission Delegated Regulation (EU) 2022/1214, clients in the corporate segment who are required to report according to CSRD and who are registered with a NACE code corresponding to one of the activities mentioned above in the Delegated Regulation were considered. Financial institutions that have benefited from financing and have exposure to corporate clients that are required to report under the CSRD and that are registered with a NACE code corresponding to one of the activities mentioned above in the Delegated Regulation were also considered. For the current reporting year, no customers that are subject to reporting on nuclear energy and gaseous fossil fuels were identified.

2.3.5. Limitations on data availability

Considering the fact that no exposures related to corporate clients that are subject to CSRD reporting have been identified, we do not identify limitations in the collection of eligibility and alignment data related to this category of clients. The Bank aims to continue working with clients to increase the quality and completeness of EU Taxonomy data, in parallel with developing its capabilities to assess portfolio alignment. The future expansion of the CSRD reporting perimeter to include small and medium-sized entities will contribute to the growth of the GAR, given the Bank's focus on financing SMEs on the local plan.

Furthermore, currently, the Bank is only able to determine the value of the Green Asset Ratio (GAR) related to flows. Existing limitations at the level of source systems and data management tools hinder the extraction of the granular information required for the calculation and validation of additional flow-based KPIs, beyond the GAR flow percentage, for both Turnover and CapEx.

As regards data collection for the retail customer segment (loans to households), as well as for local authorities, the following limitations have been identified:

Type of lending activity	Alignment details	Source of data and identified limitations
Mortgage loans granted to households, secured by residential real estate	The Bank does not report the alignment for the Retail customer category.	Currently, the Bank does not have processes, procedures, and mechanisms of data collection in place to ensure the availability of necessary information for the demonstration of alignment. With regard to demonstrating alignment, the Bank is analyzing ways to more efficiently implement a process, a methodology, and a tool for data collection, which would allow it to conduct an alignment assessment in the following years without increasing the administrative burden for clients. In this context, all exposures resulting from loans secured by residential immovable property are considered eligible under the EU Taxonomy, according to Commission Delegated Regulation (EU) 2021/2139 with respect to the climate change mitigation objective, corresponding to, Activities 7.1 and 7.7.
Auto and renovation loans granted to households	The Bank does not report the alignment for the Retail customer category.	Currently, the Bank does not carry out a separate monitoring of "auto" loans and loans for building renovations, these being classified, in their entirety, in the category of "Consumer loans".
Funding to local authorities	The Bank does not currently have a specific focus on this business segment/	Libra Internet Bank does not monitor the use of funds for a "Sustainable" purpose, in relation to any of the six environmental objectives, in the case of financing granted to local authorities. Consequently, exposures to local authorities are not included in the calculation of the Green Asset Ratio (GAR) and, according to the European Commission's Clarification Notice (FAQ), they are reported outside of the GAR calculation perimeter, being excluded from both the numerator and the denominator.

3. INFORMATION ABOUT THE MATERIAL SOCIAL TOPICS

3.1. Own Workforce

Libra Internet Bank S.A. operates within an internal framework that fosters innovation, professional growth, equity, and transparency. This framework allows all employees the opportunity to play an active role in the organization's success and digital transformation. The Bank's concern for its workforce is reflected in its policies and initiatives designed to ensure an inclusive, motivating, and flexible work environment in response to changes in the financial sector.

This chapter examines the impacts, risks, and opportunities (IRO) concerning the Bank's workforce, as determined through the double materiality assessment in accordance with ESRS requirements. It also outlines Libra Internet Bank's policies, the actions implemented, and targets set to leverage opportunities and tackle challenges related to human resources.

Libra Internet Bank's strategy and business model have a direct influence on the structure and development of its workforce, especially in aspects such as digital transformation, branch network expansion, regulatory compliance, and the development of a sustainable framework. The key workforce impacts, generated or influenced by the Bank's strategy and business model, include:

- **Digital Transformation & Automation:** The Bank's strong positioning in terms of new technologies and process digitalization has reshaped employee roles, requiring the development of specific skills and adjustments to the organizational structure.
- **Head Office and Branch Network Reorganization:** In transitioning to digital channels, new departments and roles have been established, while physical branch expansion has been strategically implemented to better meet customer needs. Additionally, a stronger focus on retail clients has led to the expansion of loan analysis and sales teams.
- **Regulatory Compliance:** The evolution of European financial regulations has required ongoing training programs and compliance awareness initiatives to ensure employees are prepared to meet new regulatory standards.
- **Implementation of the Environmental & Social (E&S) Framework:** The adoption of an E&S framework has demanded the development of new skills among employees, the creation of an interdepartmental E&S team, and the revision and reclassification of the Bank's green products according to European standards.

The Bank provides fair and sustainable working conditions for all individuals involved in its activities, both direct employees of the Bank and those engaged through temporary employment activities. This commitment is reflected in the information provided, which encompasses both employees with individual employment contracts (whether fixed-term and indefinite) as well as those assigned to the Bank through temporary work agencies.

3.1.1. Strategy

Connection of material impacts with Libra Internet Bank's strategy, business model, and activities

Libra Internet Bank recognizes that its strategy and business model directly influence its workforce, particularly through its focus on digital transformation, branch network setup, regulatory compliance, and sustainability framework development. The Bank's workforce comprises various categories of employees and non-employees who may be subject to material impacts due to its operations. Employees include Executive Management (CEO, CFO, etc.), Finance & Accounting professionals, Human Resources personnel, Information Technology staff, Supply Chain and Procurement teams, Sales & Marketing professionals (including Digital), Legal & Compliance teams (Antifraud, Risk Management), Operations and Backoffice teams, and those involved in Audit and Corporate Governance. Additionally, non-employees impacted by the Bank's activities include Contractors, Consultants, Freelancers, Bondholders, National and International Financial Institutions, and Community Stakeholders.

In this context, Libra Internet Bank has identified different material workforce impacts that originate from or are connected to its strategy and business model, including secure employment, working hours, work-life balance, social dialogue, collective bargaining, health and safety, equal pay, gender equality, training, and workforce privacy.

In line with its strategic workforce management, Libra Internet Bank ensures a fair and stable employment structure that generates material positive impacts on employees. The vast majority of staff members have indefinite employment contracts (1318 employees), with only a small number on fixed-term contracts (68 employees), mainly for temporary replacements such as maternity leave. Moreover, the Bank strives to retain these employees by offering permanent roles after their initial contract term. Secure employment fosters confidence among employees, reducing stress and enhancing motivation, ultimately leading to increased performance and commitment to company goals.

Furthermore, Libra Internet Bank maintains a standard 40-hour workweek, with regulated overtime compensated according to legal requirements either by providing additional time off or extra pay. The Bank actively discourages excessive work hours to promote a healthier work-life balance. This is further supported by initiatives such as flexible work arrangements, remote work options, additional vacation days, health insurance that includes gym memberships, sabbaticals, and study leave, all of which contribute to employees' mental and physical well-being.

Libra Internet Bank is committed to fostering an inclusive and participatory work environment by upholding fundamental labor rights such as freedom of association, collective bargaining, and social dialogue. To support this, the Bank provides internal infrastructure and manpower for organizing employee representative elections and maintains an open communication channel through HR representatives who address employee suggestions and grievances.

All legislative provisions regarding health and safety have been transposed into internal procedures to ensure employee protection and compliance with relevant regulations. The Bank prioritizes workforce well-being through transparent hiring practices, being one of the first Romanian employers to publicly disclose salary ranges in job listings and maintaining an internal pay scale accessible to all employees. The "Policy regarding remuneration and employee benefits" mandates equal pay for equal work and prohibits gender discrimination and is reinforced by the "Code of Banking Ethics," which bans any direct or indirect discrimination based on gender and other protected characteristics.

To support continuous workforce development, Libra Internet Bank provides all employees with access to internal and external training programs, covering training costs as part of a structured learning and development framework. Employees are expected to engage in ongoing professional development, as professional training is integrated into their internal KPIs.

To ensure a safe and respectful workplace, the Bank has strict policies against workplace violence and harassment, with clearly defined disciplinary consequences, including termination of employment for offenders. All complaints are handled with strict confidentiality by the Ethics Officer. Reporting channels, directly to the Ethics Officer, are available to all bank employees either through the dedicated channel published on the Bank's intranet under the "Applications" section or by sending the complaint via email to etica@librabank.ro.

Regarding confidentiality and cybersecurity, Libra Internet Bank ensures information security through robust policies, procedures, and technological measures that protect data. Employees are periodically subjected to internal training regarding data confidentiality responsibilities, reinforcing compliance with GDPR standards. The Bank includes confidentiality clauses in all client contracts and requires explicit data confidentiality agreements before processing any personal data. (SBM-3-13, S1-SBM-3.14a, SBM-3-14-c)

Connection of material risks and opportunities with Libra Internet Bank's strategy and business model

Libra Internet Bank's workforce is crucial in executing its business strategy, ensuring regulatory compliance, and delivering high-quality customer service, especially as the Bank expands its retail banking segment and advances digital transformation. The evolution of the Bank's business model presents both material risks and significant opportunities related to its impacts and dependencies on the workforce

One key risk is high employee turnover, which can lead to operational inefficiencies and reputational effects due to a less experienced workforce and can increase recruitment and training costs. To mitigate this, the Bank prioritizes secure employment, with most employees hired under indefinite contracts. Even for fixed-term contracts, efforts are made to transition employees into permanent roles, ensuring long-term career development and reducing the negative effects of turnover. This approach improves employee morale and enhances the Bank's reputation as an employer that values workforce stability.

Another significant risk relates to training and skills development, particularly in the context of digital transformation and evolving regulatory requirements. Continuous learning is essential for fostering innovation and competitive advantage, but poorly scheduled training programs, misaligned with the daily needs of the business, can lead to short-term operational disruptions. Libra Internet Bank has made training a core workforce priority, incorporating it into employee key performance indicators (KPIs) and ensuring that staff members have structured learning paths aligned with business objectives. Training programs include both internal courses and external certifications (including on sustainability-related topics), particularly in digital finance, regulatory compliance, and customer relationship strategies, equipping employees to support the Bank's expansion and technological advancements.

A further risk stems from regulatory and compliance pressures, particularly as European financial regulations become more stringent in areas such as AML/International Sanctions Management, ESG disclosures, and consumer protection laws. These expanding compliance requirements can place a significant strain on employees, leading to potential burnout and errors in regulatory reporting. To mitigate this, the Bank continuously invests in automating compliance processes, specialized hiring in regulatory roles, and ongoing compliance training to prepare employees for new regulatory challenges. The implementation of AI-driven regulatory tools also helps streamline compliance workflows, reducing manual workload and increasing efficiency.

The Bank also faces challenges related to the well-being and engagement of employees in a hybrid work model. While hybrid work arrangements provide flexibility, they also pose risks related to team cohesion, engagement, and productivity. Employees working remotely may find collaboration difficult, and some roles may require a more structured work environment. To address this, the Bank has implemented flexible work policies, mental health and well-being programs, digital collaboration tools, and a new productivity monitoring system that ensures employees remain engaged and supported in their roles. These initiatives aim to balance employee autonomy with business requirements, fostering a positive work culture that enhances job satisfaction and retention.

On the opportunity side, Libra Internet Bank's focus on secure employment provides a competitive advantage, as job stability is a key factor in attracting and retaining top talent. A secure and supportive work environment improves workforce quality, reduces turnover rates, and recruitment costs, allowing the Bank to maintain a skilled and experienced team that can effectively execute its strategy. Additionally, the expansion of the retail segment offers opportunities to leverage existing corporate banking expertise to enhance retail banking operations. Employees with corporate banking experience can contribute to cross-selling financial products and providing relationship-based advisory services, thus strengthening the Bank's retail customer engagement.

Another significant opportunity lies in improving customer service through workforce digitalization. A well-trained, digitally proficient workforce enhances the Bank's ability to provide personalized financial solutions by leveraging data analytics and AI to optimize customer interactions. The Bank is investing in AI-driven customer service tools and training employees in data-driven engagement strategies, ensuring that staff can offer high-quality, efficient service to both retail and corporate clients.

The Bank has adopted several key initiatives in order to incorporate workforce considerations into strategic planning:

1. Human Capital Investment Aligned with Growth Strategy – Workforce planning is closely linked to the Bank's retail and digital development strategies, ensuring that employees have the necessary skills to support business expansion.
2. Technology-Enabled Workforce – The Bank leverages digital banking tools to streamline operations, reduce employee workload, and enhance efficiency.
3. Sustainability and Employee Inclusion – Workforce metrics, including training hours, employee engagement, and diversity, are integrated into internal policies, ensuring transparency and accountability in workforce management.
4. Stakeholder Engagement for Workforce Resilience – The Bank actively collaborates with employees, learning institutions, and regulatory bodies to ensure that workforce transitions align with both business goals and employee well-being. (*SBM-3-13-b, SBM-3-14-d*)

Employees with particular characteristics

The Bank has identified specific demographic groups within its workforce that may be more vulnerable to workplace risks, including women in leadership roles, younger and older employees, individuals with disabilities, LGBTQ+ employees, and ethnic minorities. These groups may face challenges such as discrimination, barriers to career progression, difficulties in digital adaptation, accessibility issues, and potential exclusion. To assess and mitigate these risks, the Bank employs multiple mechanisms, including employee feedback surveys, confidential reporting channels, and whistleblower protections, ensuring that employees can safely report their concerns.

To foster an inclusive and equitable work environment, the Bank has implemented strict anti-discrimination policies, diversity training, and mentorship programs to support career advancement for underrepresented groups. Specific initiatives include structured career pathways for young employees, digital upskilling for older employees, and workplace accommodation for employees with disabilities. Additionally, leadership development programs and flexible work arrangements help address challenges related to career growth and work-life balance.

The Bank continuously monitors workforce inclusivity through workplace audits, engagement surveys, and annual diversity reports, ensuring transparency and accountability. (SBM-3-15,16)

3.1.2. Impacts, risks and opportunities management

3.1.2.1. Policies related to own workforce

Libra Internet Bank employs a comprehensive set of policies to effectively manage its workforce, ensuring alignment with regulatory requirements, industry best practices, and a strong commitment to corporate sustainability. These policies address key areas such as fair remuneration, diversity and inclusion, workplace health and safety, professional development, and work-life balance. By fostering a safe and inclusive work environment, the Bank not only promotes fair treatment but also enhances employee well-being, engagement, and long-term retention.

The Bank emphasizes policies related to ethical conduct, non-discrimination, and labor rights, reinforcing its dedication to high standards of integrity and social responsibility. In order to adapt to evolving needs of its workforce and to comply with new sustainability and governance standards, these regulatory frameworks undergo regular reviews and updates.

Below is a summary outlining the key policies that address material impacts, risks, and opportunities (IROs) related to the workforce (S1-1.19).

Code of Banking Ethics

Libra Internet Bank's Code of Banking Ethics establishes the responsibilities of the Bank and its employees toward each other, business partners, and society. It provides clear guidance on ethical conduct, helping employees understand their shared responsibilities and potential legal and ethical dilemmas that may arise in professional interactions. The Code outlines key rules, policies, and standards, reinforcing core values that govern relationships with clients, competitors, regulatory authorities, institutions, and colleagues. Serving as a framework for appropriate behavior, the Code aligns with the Bank's mission. Violations may result in disciplinary action, depending on severity. Employees facing ethical dilemmas are encouraged to seek advice from their superiors, the Human Resources Division, or the Ethics Officer for guidance on applying the Code.

The Bank's commitment to maintaining a safe and ethical work environment is reinforced through strict anti-harassment provisions that ensure confidentiality, compliance monitoring, and appropriate actions against violations.

The Ethics Officer is responsible for monitoring and reporting compliance with the Code. This includes tracking the number of recorded incidents, implementing resolution measures, and making recommendations for improvement. Investigations into allegations of violence or harassment are conducted with strict confidentiality to protect all parties involved. The Ethics Officer collaborates with the Human Resources Division to initiate preliminary disciplinary investigations when allegations arise.

The most senior level accountable for the implementation of the Code of Banking Ethics is the Deputy General Director in charge of Risk and Compliance, supported by the Ethics Officer (Head of the Compliance Division). The Deputy General Director holds overall responsibility for ensuring the policy's enforcement, alignment with regulatory requirements, and integration into the Bank's corporate governance framework. This governance structure ensures that ethical policies are consistently applied, monitored, and enforced within the Bank. (*MDR-P 65-c*)

If a disciplinary investigation confirms the occurrence of harassment, appropriate corrective measures are applied. The Ethics Officer ensures that follow-up measures are implemented, verifying that recommendations have been implemented, harassment has ceased, and the affected employee is satisfied with the resolution.

Employees who are dissatisfied with the resolution of a harassment case have several options for escalation, including the National Council for Combating Discrimination, the Territorial Labor Inspectorate, and the Courts. Additionally, if an act appears to meet the legal criteria for a criminal offense, the employee or the Bank may report the case to criminal investigation authorities. These mechanisms ensure a comprehensive framework for ethical compliance and workplace safety.

The Code of Banking Ethics addresses key Impacts, Risks, and Opportunities (IROs) related to workplace conduct and employee protection. Specifically, it covers measures against violence and harassment in the workplace (Positive Impact) by clearly defining responsibilities for preventing and addressing such incidents. The Code establishes a confidential investigation process, ensuring that the Ethics Officer and HR Division collaborate in handling disciplinary actions. Employees who experience harassment have access to legal recourse, including the National Council for Combating Discrimination, the territorial labor inspectorate, and the courts, ensuring that = are addressed through proper channels. The Ethics Officer monitors and reports compliance, tracks reported incidents, ensures resolutions are implemented, and follows up to confirm that harassment has ceased.

Furthermore, the Code addresses privacy (Positive Impact) by mandating that all investigations and complaints regarding harassment are overseen with strict confidentiality, safeguarding the privacy of all individuals involved. The Ethics Officer and relevant authorities are responsible for ensuring that sensitive employee data is managed responsibly during these investigations. These measures help create a safe, respectful, and legally compliant workplace environment, reinforcing the Bank's commitment to ethical business practices and employee well-being. *MDR-P 65-a*

The Code of Banking Ethics is designed to prevent inappropriate management practices, economic and financial crimes, and ensure ethical conduct across all levels of the Bank. It establishes clear guidelines to mitigate risks related to fraud, money laundering, antitrust practices, bribery, and other violations of consumer protection laws. The policy also emphasizes the protection of confidential information and prohibits the misuse of an employee's position for personal or undue benefit.

In addition to ensuring compliance with financial regulations and ethical business conduct, the policy specifically addresses workplace safety and professional behavior by preventing and penalizing harassment and acts of violence. The Code applies not only to internal employee relations but also extends to interactions between employees and external stakeholders, such as suppliers and customers. This broad scope ensures that ethical standards are upheld throughout the Bank's operations and business relationships, fostering trust, transparency, and accountability in every aspect of its value chain. *MDR-P 65-b*

The Code of Banking Ethics does not explicitly reference third-party standards or initiatives. However, the Bank complies with several national and European data protection and privacy regulations that influence its ethical and security policies, including:

- Law no. 190/2018 regarding measures for implementing Regulation (EU) 679/2016 (GDPR) on the protection of personal data
- ANSPDCP Decision no. 174/2018 regarding mandatory impact assessments for personal data protection
- Law no. 102/2005 regarding the establishment and operation of the National Authority for the Supervision of Personal Data Processing (ANSPDCP)
- ANSPDCP Decision no. 128/2018 regarding the approval of the standard notification form for personal data breaches under GDPR
- Guidelines and Opinions issued by the European Data Protection Board (EDPB)
- Guidelines issued by the National Supervisory Authority for Data Processing

By adhering to these regulatory frameworks, the Bank ensures that it meets strict compliance standards related to privacy, security, and ethical conduct, reinforcing its commitment to responsible business practices. (*MDR-P 65-d*)

The Code of Banking Ethics and Anti-Harassment Policy is not publicly available but may be disclosed upon request to specific partners or suppliers on a case-by-case basis. While the policy primarily governs internal conduct, it is also applicable in cases of external complaints against employees.

This approach ensures that relevant external stakeholders, such as business partners or regulatory bodies, can access the policy, when necessary, while maintaining confidentiality and compliance with internal governance standards. The Bank's ethical framework remains enforceable in interactions beyond its workforce, safeguarding integrity in all professional relationships. (*MDR-P 65-f*)

Procedure on the Processing of Personal Data

The GDPR Procedure regulates the processing of personal data to ensure compliance with (EU) Regulation 679/2016 (GDPR) regarding the protection of natural persons in relation to data processing and the free circulation of personal data. It applies to all activities that involve the processing of personal data, whether in written or electronic format, and covers the Bank's employees, collaborators, associated operators, authorized persons, and third parties.

All Bank staff are required to know and comply with the provisions outlined in the Procedure Regarding the Processing of Personal Data, which defines the necessary steps to be followed by employees (data users) to ensure compliance with legal norms on data protection and security.

This procedure relates to the positive impact regarding Privacy by ensuring that the processing, storage, and transfer of personal data meet strict security and confidentiality standards. It mitigates risks associated with data misuse, unauthorized access, and regulatory non-compliance penalties, while reinforcing the Bank's reputation as a responsible data controller. By implementing robust data protection measures, the Bank fosters trust among customers, employees, and third parties, thereby enhancing customer relationships and business partnerships. Ensuring GDPR compliance not only reduces potential legal and financial liabilities but also creates opportunities for the Bank to differentiate itself as a trusted and security-conscious financial institution.

Additionally, the Code supports the positive impact related to Measures Against Violence and Harassment in the Workplace by reinforcing confidentiality in workplace harassment investigations, ensuring that victims' data remains protected, and that sensitive information is handled securely. Employees involved in harassment complaints or whistleblowing reports are legally protected from data misuse, ensuring fair and secure resolution processes. This approach strengthens Libra Internet Bank's commitment to maintaining a safe, ethical, and compliant workplace where data privacy and individual rights are safeguarded (*MDR-P 65-a*)

The Procedure aims to ensure that all personal data processing operations are conducted in full compliance with the principles established under Regulation (EU) 679/2016 (GDPR). The policies are designed to protect data subjects' rights and maintain the security, integrity, and confidentiality of personal data processed by the Bank.

The users of data, including employees and collaborators of the Bank, are required to adhere strictly to the provisions of this policy by limiting the collection and processing of personal data to what is strictly necessary for fulfilling their job responsibilities. Each user is individually responsible for effectively managing personal data, except in situations beyond their control.

In the event of a security incident, data users must immediately notify the Data Protection Officer (DPO) and the Information Security Department (OSI) and cooperate with the Investigation and Intervention Team by providing all necessary data, information, or documentation related to the incident. If needed, the DPO or OSI will escalate the matter to the Anti-Fraud Division for further investigation, while the Risk Management Division will oversee and monitor the security incident. This process ensures the timely detection, response, and mitigation of personal data security risks (*MDR-P 65-b*)

The highest level accountable for the implementation and enforcement of the Anti-Harassment Policy is the Deputy General Director (Chief Risk Officer) in charge of Risk and Compliance, supported by the Ethics Officer (Head of Compliance Division). These senior leaders ensure that the policies are integrated into the Bank's governance framework, monitored for compliance, and enforced consistently across all operations.

The Chief Risk Officer holds ultimate responsibility for ensuring that workplace ethics principles are upheld, while the Ethics Officer oversees compliance monitoring, incident reporting, and disciplinary investigations in collaboration with the HR Division. This structure ensures that personal data security and ethical workplace conduct remain key priorities within the organization (*MDR-P 65-c*)

The Chief Executive Officer (CEO) holds the ultimate responsibility for the implementation of the Procedure on the Processing of Personal Data in accordance with Regulation (EU) 679/2016 on the protection of natural persons regarding the processing of personal data and the free movement of such data (GDPR). This regulation outlines the fundamental principles of lawful, fair, and transparent data processing, providing a comprehensive framework for ensuring the protection of personal data across the Bank's operations (*MDR-P 65-d*).

The Procedure takes into consideration the rights of all stakeholders, including:

- ⇒ The right to file a complaint with ANSPDCP (National Authority for Supervising the Processing of Personal Data)
- ⇒ The right of access and information regarding the processing of their personal data
- ⇒ The right to rectify inaccurate or incomplete data

- ⇒ The right to data erasure ("right to be forgotten") under certain legal conditions
- ⇒ The right to restrict data processing in specific situations
- ⇒ The right to data portability, allowing individuals to transfer their data between service providers
- ⇒ The right to object to data processing based on legitimate interests
- ⇒ The right not to be subject to automated decision-making processes that have significant effects on them

By upholding these rights, the regulation ensures that the Bank maintains fair, transparent, and legally compliant data processing practices while respecting the interests of its customers, employees, and business partners (*MDR-P 65-d*).

The Procedure is not publicly available; however, the Bank ensures transparency in data processing by providing a general data processing and protection policy that is publicly accessible on its website. This policy outlines the Bank's approach to personal data collection, storage, processing, and security.

At the same time, the regulations may be provided upon request to relevant partners or regulatory authorities. The policy applies in cases of external complaints against employees, ensuring that personal data protection standards extend beyond internal operations (*MDR-P 65-f*).

Anti-harassment Policy

The Anti-Harassment Policy ensures that all individuals interacting with the Bank—including employees, customers, temporary workers, contractors, and visitors—are protected from harassment. The Bank takes all necessary measures to hold perpetrators accountable, enforcing disciplinary, contravention, or criminal consequences as applicable. Any employee found to have harassed another individual may face disciplinary sanctions, including potential termination of employment.

All harassment complaints are treated seriously and confidentially. Employees can report acts of harassment through the Libra Home reporting channel, with records securely stored for five years.

The highest level accountable for implementing the Anti-Harassment Policy is the Steering Committee, which provides overall oversight and ensures that the policy aligns with the Bank's broader ethical and compliance frameworks.

The Ethics Officer, appointed by the Steering Committee, is responsible for day-to-day enforcement, monitoring, and reporting of the policy. This includes investigating harassment complaints, ensuring confidentiality, implementing disciplinary actions, and submitting annual compliance reports to the Steering Committee. These reports are submitted by the end of the first quarter of each year, detailing the number of recorded incidents, resolution outcomes, and any recommendations for improvement. This structured oversight ensures that all levels of the organization uphold ethical workplace standards, and that employees, customers, and other stakeholders are protected from harassment (*MDR-P 65-c*).

This policy directly addresses the positive impact related to Measures Against Violence and Harassment in the Workplace by preventing and addressing workplace harassment. Additionally, it supports the positive impact regarding Secure Employment by ensuring a safe and respectful work environment where employees are protected from threats or harassment that could impact job stability. It also contributes to the positive impact related to Social Dialogue by establishing formal reporting channels for employees to report harassment incidents, ensuring their voices are heard. The policy further reinforces the positive impact regarding Privacy by guaranteeing that all harassment reports and investigations remain confidential and securely stored for a defined period (*MDR-P 65-a*).

The objective of the Anti-Harassment Policy is to ensure equal opportunities and fair treatment for all employees while preventing violence and harassment in the workplace. The policy recognizes every employee's right to a safe work environment and seeks to promote a culture of mutual respect and dignity.

It covers all workplace activities, including on-site work, work-related interactions, and digital communication platforms used for professional purposes.

The policy extends across the entire value chain, including internal employees, third-party service providers, and external stakeholders engaging with the Bank. While the policy is not publicly available, it can be disclosed on demand to relevant partners or suppliers in cases where an external complaint is filed against a Bank employee.

Geographically, the policy applies to all locations where the Bank operates and ensures compliance with national labor laws and European regulations on workplace equality and harassment prevention (*MDR-P 65-b*).

The Bank's Anti-Harassment Policy aligns with national and European legal frameworks designed to prevent and combat workplace harassment and discrimination. These include:

- ⇒ Decision No. 27/2025 amending and supplementing the Methodology on the prevention and combating of harassment on grounds of sex and moral harassment at the workplace, approved by Decision No. 970/2023.
- ⇒ Government Ordinance No. 137/2000 on the prevention and sanctioning of all forms of discrimination, republished, as subsequently amended and supplemented.
- ⇒ Decision no. 970/2023 – Approval of the Methodology for the Prevention and Combating of Harassment on the basis of Sex and Moral Harassment at the Workplace.
- ⇒ Government Ordinance no. 137/2000 – Framework for the prevention and sanctioning of all forms of discrimination, including harassment.
- ⇒ Law no. 202/2002 – Ensures equal opportunities and treatment between women and men, addressing workplace harassment as a form of gender-based discrimination (*MDR-P 65-d*).

This policy recognizes the fundamental importance of a work environment free from harassment and ensures that any reported cases are managed seriously, fairly, and in full compliance with legal and regulatory standards.

Although the policy primarily governs internal workplace conduct, it is applicable in cases of external complaints against Bank employees, ensuring that ethical and behavioral standards extend beyond internal operations. This approach maintains the Bank's commitment to confidentiality while enabling external stakeholders to access the policy in specific situations (*MDR-P 65-f*).

The Policy on Occupational Safety and Health and Emergency Situations within Libra Internet Bank

The Policy outlines the Bank's commitment to ensuring a safe and compliant working environment, reducing occupational risks, and improving health and safety performance. The policy is implemented through a structured health and safety management system, which includes continuous risk assessments and the application of necessary control measures across all Bank processes and services.

The Internal Service of Prevention and Protection (ISPP) comprise two key components: Occupational Safety and Health (OSH) and Emergency Situations (ES). Employees in management positions or those assigned as workplace managers are responsible for overseeing and enforcing health and safety measures, ensuring compliance with legal and internal policy requirements. These responsibilities include the implementation, control, and supervision of all safety procedures within their respective workplaces.

Managers are required to conduct and verify periodic safety training for employees, assisted by representatives of the Internal Prevention and Protection Service (SIPP). Training topics are provided by SIPP personnel and supported by internal work procedures and specific safety instructions.

This policy directly addresses the positive impact related to Health and Safety by enforcing continuous risk assessments, workplace safety controls, and compliance with occupational safety regulations. It also supports the positive impact pertaining to Secure Employment by ensuring a safe work environment, reducing health hazards that could impact job security. Additionally, the policy reinforces the positive impact regarding acquiring knowledge through the periodic safety training for employees and managers, ensuring continuous learning about workplace hazards (*MDR-P 65-a*).

The Policy on Occupational Safety and Health and Emergency Situations within Liba Internet Bank defines the rules, instructions, and procedures necessary for applying workplace safety and emergency preparedness standards within the Bank. It ensures that all employees receive adequate training, and testing in workplace safety and emergency response.

The policy assigns specific safety responsibilities to employees based on their roles. These responsibilities are established by the employer or the employer's legal representative in accordance with the legislation in force, who may consult the Safety and Health at Work Committee or representatives of the Internal Prevention and Protection Service (ISPP). In cases where the Bank collaborates with an external prevention and protection service provider, responsibilities may be assigned based on contractual agreements.

The policy applies to all locations where the Bank operates, ensuring alignment with national occupational health and safety regulations. By maintaining a proactive risk management approach, the Bank ensures compliance with legal requirements, workplace safety, and emergency response preparedness across all departments and branches (*MDR-P 65-b*).

The legal representative is responsible, within the organization, for organizing and ensuring occupational health and safety and emergency management measures, with the Internal Prevention and Protection Service (ISPP) functioning within the organization as the implementation and monitoring structure, and the heads of the workplaces are directly responsible for applying OHS and ES measures, for on-the-job and periodic training, as well as for supervising the workers under their authority, in accordance with the applicable legislation.

The occupational health and safety policy is managed by the SIPP representatives, who monitor compliance with the regulations set out in the policy. (*MDR-P 65-c*).

The Policy on Occupational Safety and Health and Emergency Situations within Libra Internet Bank aligns with the following national occupational safety and fire protection regulations:

- ⇒ Law no. 319/2006 – Law on Safety and Health at Work
- ⇒ Government Decision no. 1425/2006 – Approval of Methodological Norms for implementing the Safety and Health at Work Law
- ⇒ Government Decision no. 955/2010 – Amendments to the Methodological Norms for applying the Safety and Health at Work Law
- ⇒ Law no. 307/2006 – Law on Fire Protection
- ⇒ Order of the Minister of Administration and Interior no. 163/2007 – General Norms for Fire Protection

These legal references form the foundation of the Policy on Occupational Safety and Health and Emergency Situations within Libra Internet Bank, ensuring compliance with national standards (*MDR-P 65-d*).

The Health and Safety Policy ensures employee participation in workplace safety discussions through the Safety and Health at Work Committee. The committee consists of employee representatives and employer representatives, responsible for monitoring safety conditions, providing recommendations, and engaging in consultations regarding workplace health and safety. The Safety and Health at Work Committee convenes quarterly, allowing employees to discuss and address safety concerns. The committee's findings and recommendations are documented in meeting minutes, and key safety measures are communicated to all employees. This structure ensures that workplace safety concerns are addressed in a transparent and participatory manner (*MDR-P 65-e*).

The Policy is not publicly available, but it may be disclosed on demand to relevant partners or suppliers on a case-by-case basis.

Although the policy is primarily an internal document, its principles apply to all employees and external parties involved in workplace safety procedures. This approach ensures that relevant stakeholders are informed about safety standards and compliance requirements while maintaining internal confidentiality (*MDR-P 65-f*).

The Policy on Employee Training and Professional Development Activities

The Policy on Employee Training and Professional Development Activities establishes a structured framework for continuous learning and career development within the Bank. It defines key aspects such as the strategy for employee development, the annual training budget, eligibility criteria for external training programs, and the allocation of responsibilities for managing training initiatives.

The policy includes an annual professional development plan, which outlines:

- ⇒ Induction training programs for new employees.
- ⇒ Training through external online course platforms to expand learning opportunities.
- ⇒ Training sessions for all employees or specific job functions to ensure competency development.
- ⇒ Evaluation of training effectiveness by external providers and monitoring of employee knowledge acquisition.
- ⇒ Mandatory courses and compliance-related tests required for regulatory adherence.

- ⇒ Performance indicators to track the impact of training and ensure alignment with the Bank's objectives.

This policy directly supports the Training and Skills Development positive impact, by ensuring structured and continuous professional growth for employees. It also mitigates the risk related to Training and Skills Development by addressing potential gaps in knowledge, regulatory compliance issues, and skill shortages. Additionally, it leverages the opportunity regarding Training and Skills Development by offering external learning platforms, structured career development programs, and performance-based training enhancements to drive employee engagement and expertise.

The monitoring process includes evaluating training sessions, tracking employee participation, and assessing the effectiveness of learning initiatives. By fostering a culture of continuous improvement, the policy strengthens workforce capabilities, aligns employee development with business objectives, and enhances the overall professional competency of the Bank's staff (*MDR-P 65-a*).

The Training and Professional Development Policy is designed to enhance employees' knowledge, skills, and competencies in alignment with both individual career growth and the Bank's long-term business strategy.

The policy ensures employees receive ongoing training and professional development opportunities to:

- ⇒ Adapt to evolving job roles and workplace requirements.
- ⇒ Update and refine expertise related to their positions.
- ⇒ Undergo professional reconversion due to socio-economic changes.
- ⇒ Acquire advanced skills necessary for business growth and industry trends.
- ⇒ Develop their careers within the Bank, in coordination with the Policy on Career and Succession Management within Libra Internet Bank.
- ⇒ Minimize operational risks arising from inadequate employee training.

Training sessions and courses are conducted according to an annual professional development plan, which can be adjusted throughout the year based on emerging training needs, new regulatory requirements, or evolving business priorities. The policy applies to all employees of the Bank, including those on indefinite-term and fixed-term contracts, as well as temporary employees hired through employment agencies.

To ensure training effectiveness, employees are encouraged to provide feedback after completing courses facilitated by external trainers. Additionally, the Training and Professional Development Department proactively shares learning recommendations and updates on relevant topics available through online learning platforms to encourage continuous education and engagement.

By aligning employee training initiatives with the Bank's annual business strategy, the policy ensures that learning and professional development remain integral to workforce competency and organizational success (*MDR-P 65-b*). The General Director and the Head of the Human Resources Division are responsible for the implementation, oversight, and enforcement of the Training and Professional Development Policy.

They ensure that training programs are strategically aligned with workforce needs, business objectives, and regulatory requirements. Their responsibilities include:

- ⇒ Supervising the execution of the annual professional development plan.
- ⇒ Approving budgets for training and skill development initiatives.
- ⇒ Ensuring compliance with mandatory training requirements.
- ⇒ Evaluating the effectiveness of training programs based on performance indicators (*MDR-P 65-c*).

The Policy on Employee Training and Professional Development Activities aligns with Law no. 53/2003 – The Labor Code, which establishes the legal framework for employment relationships, employee rights, and professional development obligations in Romania. By adhering to Law no. 53/2003, the Bank ensures that its training programs comply with national labor laws, fostering workforce upskilling, career advancement, and long-term employment stability (*MDR-P 65-d*).

The Policy on Career and Succession Management within Libra Internet Bank

The Policy on Career and Succession Management within Libra Internet Bank establishes a structured framework for employee career development, internal mobility, and leadership succession within the Bank. It defines the general principles governing promotions, transfers, career planning, and succession management for key roles and leadership positions.

Key elements of the policy include:

- ⇒ Principles for the promotion and transfer process, ensuring transparency and equal opportunity.
- ⇒ Career management framework, including career path planning and structured career development.
- ⇒ Internal promotion and transfer procedures detailing how employees can move into new roles.
- ⇒ Succession management process, ensuring leadership continuity for governing body members and key functions.

The general principles guiding promotions and internal transfers emphasize:

- ⇒ Equal opportunity for all employees to access career growth opportunities based on merit.
- ⇒ Non-discrimination policies, ensuring selection processes are free from biases related to race, gender, religion, sexual orientation, or political beliefs.
- ⇒ Job security for internal candidates, meaning employees who apply for a new role do not risk their current position or future career prospects.
- ⇒ Active involvement of division directors in encouraging high-performing employees to seek career advancement.

This policy directly supports the positive impact related to Secure Employment by providing employees with career growth opportunities within the Bank, reducing external job market uncertainties. It also addresses the Secure Employment risk by ensuring fair and structured promotion processes, mitigating concerns about job instability or favoritism. Additionally, the opportunity related to Secure Employment is reinforced by supporting leadership development and internal career mobility, ensuring employees have pathways to advancement within the organization.

The policy also integrates work-life balance considerations, aligning with the positive impact on Work-Life Balance by ensuring career progression does not come at the expense of employee well-being and that flexible career growth opportunities are available. Furthermore, the policy contributes to the positive impact pertaining to Social Dialogue by establishing clear communication channels for career advancement, internal mobility, and succession planning, ensuring that employees have a voice in their professional growth.

Additionally, the policy aligns with the positive impacts on Freedom of Association, Works Councils, and Workers' Rights and Collective Bargaining by ensuring that career development opportunities are fair, transparent, and aligned with labor rights, fostering an inclusive and participatory work environment.

The policy also integrates training and professional development, aligning with the positive impact regarding Training and Skills Development by preparing employees for new roles through targeted skill development initiatives. To mitigate the risk regarding Training and Skills Development, the policy ensures that employees are equipped with the necessary skills before advancing into new positions, reducing performance risks. Lastly, the policy leverages the opportunity pertaining to Training and Skills Development by promoting continuous learning, leadership growth, and long-term workforce sustainability.

The monitoring process includes evaluating promotion and succession outcomes, tracking career progression metrics, and ensuring compliance with internal regulations to maintain a merit-based and transparent approach to career development. Through these measures, the Policy on Career and Succession Management within Libra Internet Bank contributes to a secure, fair, and growth-oriented work environment, ensuring the Bank remains competitive, inclusive, and aligned with best workforce development practices (*MDR-P 65-a*).

The Policy on Career and Succession Management within Libra Internet Bank defines the principles and responsibilities for managing employee career progression and leadership succession within the Bank. It establishes a structured process for internal recruitment, career mobility, and succession planning, ensuring that employees receive appropriate training and experience to prepare for new roles.

This policy applies to all Bank employees, covering career development programs for employees at all levels, internal promotion, and transfer procedures applicable to all eligible staff, and succession planning for key leadership positions, including governing body members and critical functional roles.

The policy ensures job security for internal candidates, allowing employees to apply for new positions without jeopardizing their current role or future career prospects. Additionally, employees identified as potential successors participate in annual training plans and leadership development programs, strategic meetings and professional development sessions, and succession-specific training for external candidates, which occurs between the date of appointment and formal regulatory approval by the National Bank of Romania. (*MDR-P 65-b*)

The General Director and the Head of the Human Resources Division are responsible for the implementation, oversight, and enforcement of the Career and Succession Management Policy.

Their key responsibilities include:

- ⇒ Supervising career development initiatives and ensuring alignment with workforce planning strategies.
- ⇒ Monitoring internal recruitment, promotion, and transfer processes to ensure transparency and merit-based decision-making.
- ⇒ Overseeing leadership succession planning to ensure a strong talent pipeline for key governance roles.
- ⇒ Ensuring compliance with the Bank's policies and regulatory standards related to career progression and talent management (*MDR-P 65-c*).

To support career growth and leadership succession, the Bank allows talented employees to express their career interests, choosing from fields such as operations, risk management, business and sales, and technology and digital banking. When identifying potential successors, the Bank considers both selection criteria and diversity principles, ensuring a balance of knowledge, skills, and experience among leadership candidates.

Internal candidates nominated as potential successors are required to attend leadership training and development programs, participate in strategic meetings and succession planning sessions, and engage in ongoing mentorship and executive learning. For external succession candidates, training takes place between the appointment date and regulatory approval from the National Bank of Romania.

By incorporating employee aspirations, diversity factors, and structured development programs, Libra Bank ensures equitable career growth, workforce stability, and long-term succession planning

The Policy on Career and Succession Management within Libra Internet Bank is not publicly available but is internally accessible to employees and HR personnel responsible for managing career development and leadership succession. While the full policy remains confidential, key career pathways, internal promotion processes, and leadership succession frameworks are communicated through internal channels, ensuring transparency, accessibility, and strategic workforce alignment (*MDR-P 65-f*).

Policy regarding remuneration and employee benefits

The Policy regarding Remuneration and Employee Benefits establishes a structured framework for fair and transparent compensation, performance-based incentives, and employee benefits across all categories of the Bank's personnel. It defines key aspects such as:

- ⇒ General structure of remuneration, including fixed and variable pay components.
- ⇒ Fixed remuneration criteria, based on salary grids, internal and external equity, and equal pay principles.
- ⇒ Variable remuneration criteria, linked to performance-based bonuses, compensatory allowances, and other financial incentives.
- ⇒ General responsibilities for the remuneration process, ensuring compliance with the Bank's strategic goals and financial stability.
- ⇒ Rules for Identified Personnel, including remuneration structures for the Steering Committee, Board Members, and employees whose roles significantly impact the Bank's risk profile.
- ⇒ Employee benefits and additional facilities, ensuring a competitive compensation package.

The policy is reviewed annually under the coordination of the Human Resources Division, alongside the Risk Management and Compliance Divisions, and is approved by the Board of Directors. The policy is also subject to annual evaluation by the Internal Audit Division to ensure compliance with the remuneration framework adopted by the Bank's governance bodies.

The General Director and the Head of the Human Resources Division are responsible for the implementation, oversight, and enforcement of the Remuneration and Employee Benefits Policy.

Their responsibilities include:

- ⇒ Supervising the execution of remuneration frameworks to ensure alignment with performance goals and financial stability.
- ⇒ Monitoring compliance with internal policies and regulatory requirements for fair and responsible pay practices.
- ⇒ Ensuring risk-adjusted remuneration strategies, preventing excessive variable compensation linked to high-risk activities.
- ⇒ Reviewing annual compensation structures, ensuring they remain competitive, equitable, and aligned with market standards (*MDR-P 65-c*)

To align remuneration with financial performance and risk management, the policy follows these key principles:

- ⇒ Variable remuneration is adjusted based on the Bank's financial performance, ensuring sustainability and risk control.
- ⇒ Performance-based adjustments are incorporated to ensure alignment with long-term objectives.
- ⇒ Strict compliance with regulatory frameworks, preventing the use of vehicles or methods to bypass remuneration governance.
- ⇒ Risk-mitigation measures, ensuring employees do not engage in practices that could lead to excessive risk-taking or conflict of interest.

The **Remuneration and Employee Benefits Policy** supports multiple sustainability matters related to secure employment, fair wages, training and development, and workplace equality.

The policy also maintains a positive impact on the balance between professional and private life by incorporating flexible remuneration structures and additional employee benefits that support work-life balance, such as bonuses, leave policies, and other financial incentives that enhance employees' overall well-being.

Additionally, the policy ensures a positive impact on Social Dialogue by fostering transparent salary discussions, employee feedback mechanisms, and structured dialogues on equal pay, reinforcing an environment of collaboration and fairness.

The policy supports the positive impact pertaining to Adequate Wages by ensuring a structured approach to remuneration that aligns with market benchmarks, internal equity, and regulatory standards. It guarantees that all employees receive fair, transparent, and performance-based compensation, preventing wage disparities and supporting financial stability. Additionally, the positive impact related to Gender Equality and Equal Pay for Equal Work is addressed through equal pay policies, salary transparency, and non-discriminatory compensation structures, ensuring that all employees receive comparable remuneration based on role, experience, and performance rather than gender or other personal characteristics. (*MDR-P 65-a*). The Remuneration and Employee Benefits Policy is an essential component of the Bank's internal governance framework, designed to foster a performance-based culture where individual goals align with the Bank's strategic objectives. By ensuring that remuneration practices support sustainable growth, the policy links compensation with the Bank's financial performance and long-term risk appetite, reinforcing responsible and balanced decision-making.

By establishing a structured, transparent, and equitable approach to remuneration, the policy helps the Bank attract and retain top talent, mitigate excessive risk-taking, and align employee incentives with overall business performance. Through these principles, the Bank promotes a work environment where employees are fairly rewarded for their contributions, motivated to perform, and supported in their professional growth (*MDR-P 65-b*).

The Remuneration and Employee Benefits Policy align with multiple national and European regulatory frameworks, ensuring compliance with industry standards and governance best practices. These include:

- ⇒ NBR Regulation No. 5/2013 – Establishes prudential requirements for credit institutions and implements CRD IV (European Directive 2013/36/EU) on remuneration policies.
- ⇒ Government Emergency Ordinance No. 99/2006 – Regulates credit institutions and capital adequacy, ensuring remuneration aligns with risk-based performance.
- ⇒ EU Delegated Regulation No. 527/2014 – Supplements Directive 2013/36/EU, setting remuneration governance requirements for financial institutions.
- ⇒ EBA Guidelines (EBA/GL/2016/06) – Regulates remuneration practices for banking product sales and service provision.
- ⇒ EBA Guidelines (EBA/GL/2021/04) – Establishes best practices for sound remuneration policies within the financial sector.
- ⇒ Romanian Labor Code (Law No. 53/2003) – Governs employee rights, fair pay practices, and employment regulations (*MDR-P 65-d*).

The Remuneration and Employee Benefits Policy is designed to balance employee motivation, corporate performance, and risk management, considering the interests of multiple stakeholders.

The Human Resources Division oversees the implementation process, guided by the following principles:

- ⇒ Motivating employees and maximizing their performance.
- ⇒ Attracting and retaining top talent within the Bank.
- ⇒ Supporting a strong organizational culture based on merit, transparency, and corporate values.
- ⇒ Aligning remuneration with financial stability, including profitability, risk, capital adequacy, and liquidity management.
- ⇒ Ensuring compliance with labor laws and regulatory frameworks.
- ⇒ Maintaining transparency and internal equity, preventing salary discrimination or wage gaps.
- ⇒ Avoiding conflicts of interest, ensuring variable compensation does not encourage excessive risk-taking.

For employees responsible for the credit analysis process, the policy ensures:

- ⇒ They are not incentivized to take on excessive risk, ensuring a balanced and responsible approach to loan approvals.
- ⇒ Their remuneration does not depend solely on the number of credit approvals, preventing conflicts of interest that could undermine risk management.

For employees involved in retail banking product sales, the policy ensures:

- ⇒ Their compensation is not exclusively linked to product sales targets.
- ⇒ They do not prioritize promoting more profitable products at the expense of consumer needs (*MDR-P 65-e*).

The Remuneration and Employee Benefits Policy is not publicly available but remains internally accessible to key stakeholders. Employees can access the policy to ensure transparency in pay structures and benefits, allowing them to understand their compensation framework. Regulators may review the policy upon request to verify compliance with labor and banking regulations, ensuring that the Bank meets all legal and industry standards. Additionally, governance bodies oversee its implementation to uphold fair pay practices and risk-adjusted compensation, maintaining alignment with corporate objectives and regulatory expectations.

By enforcing strict governance, regulatory compliance, and equitable pay structures, the policy reinforces employee satisfaction, corporate responsibility, and long-term financial stability while supporting a transparent and well-regulated work environment (*MDR-P 65-f*).

Procedure regarding teleworking

The Procedure Regarding Teleworking establishes the framework for organizing remote work, ensuring employees adhere to the Bank's operational, security, and compliance standards while working outside the office. The policy outlines methods for configuring and securing SSL-VPN connections, ensuring that employees using work laptops can securely access the Bank's IT network. Remote employees must comply with the internal regulations regarding working hours and must remain accessible during working hours via the Bank's designated communication tools, including mobile phones, email, and Microsoft Teams.

Employees handling ReGIS, SaFIR, and SENT applications have dedicated secure access through pre-configured workstations, ensuring that sensitive financial operations maintain the same security standards as on-site work. The policy also mandates that all remote employees remain aware of their responsibility to report operational risks, incidents, or dysfunctions through the Bank's operational risk application. If an employee cannot access the reporting system, they must immediately notify their direct supervisor and the Risk Management Division via email or phone.

The policy reinforces security and data protection through strict adherence to GDPR principles, requiring employees to store all work files in designated locations and prohibiting data transfers to personal devices or unauthorized storage media. Workstations must never be left unattended to prevent data breaches or unauthorized access. Any violation of these security measures is considered a data security incident and must be reported immediately.

This policy primarily supports the positive impact on privacy by implementing strict security and data protection measures that safeguard confidential information while allowing employees to work remotely. Ensuring compliance with GDPR and internal data protection rules reduces the risk of privacy breaches and unauthorized data access.

Additionally, the policy contributes to the positive impact on Secure Employment by providing employees with structured guidelines that allow for flexible work arrangements without jeopardizing their job stability. It also mitigates the risk pertaining to Secure Employment by ensuring remote work does not lead to job insecurity or operational inefficiencies. Employees are protected through clearly defined teleworking conditions, enabling them to balance remote and office-based work without disruption.

The policy also aligns with the positive impact regarding Work-Life Balance by allowing employees to work remotely under structured conditions, reducing commuting time and offering greater flexibility in managing professional and personal commitments. The positive impact related to Working Time is reinforced by maintaining clear guidelines on working hours, ensuring that remote work remains structured and does not extend beyond contractual obligations.

Additionally, the positive impact on Health and Safety is indirectly supported by reducing employees' need for physical commuting, thereby minimizing workplace-related risks and enhancing overall well-being (*MDR-P 65-a*).

The Procedure Regarding Teleworking applies to all employees authorized to work remotely, ensuring that teleworking does not compromise operational efficiency or data security. The policy establishes proper working conditions for remote employees while safeguarding the Bank and its stakeholders, including customers and financial institutions such as ReGIS, SaFIR, and SENT, from privacy and security risks.

The procedure defines clear roles and responsibilities for remote employees, managers, and IT security teams to maintain a secure and compliant remote work environment. This ensures that remote work arrangements align with the Bank's risk management framework and regulatory obligations (*MDR-P 65-b*).

The General Director and the Head of the Human Resources Division are responsible for overseeing the implementation of the Procedure Regarding Teleworking. Their role includes ensuring compliance with labor regulations, maintaining security standards, and addressing any operational risks associated with remote work (*MDR-P 65-c*).

The Procedure Regarding Teleworking complies with Law no. 241/2023, which governs remote work arrangements and ensures that organizations implement appropriate controls to mitigate privacy and security risks. By adhering to this legal framework, the Bank upholds national labor and data protection standards while supporting a flexible work environment (*MDR-P 65-d*).

The policy is designed to balance employee flexibility, operational efficiency, and data security. By providing structured guidelines for teleworking, the Bank ensures that employees can work remotely under secure conditions while maintaining uninterrupted business operations. Additionally, customers and financial institutions that rely on the Bank's services are protected from privacy and security risks through strict adherence to data protection protocols.

The Procedure Regarding Teleworking is not publicly available but is internally accessible to relevant stakeholders, including HR personnel, IT security teams, and employees authorized for remote work. This ensures that all teleworking policies and security protocols are consistently applied and understood across the organization (*MDR-P 65-f*).

Procedure on Performance Management

The Procedure on Performance Management establishes a structured framework for the annual performance evaluation process, ensuring transparency, consistency, and professional development for all employees. The policy outlines the key stages of the evaluation process, defines the criteria for assessment, and provides guidelines for handling non-standard situations. The performance management process takes place annually, typically in February, and generally spans six weeks, with an evaluation calendar communicated by the Human Resources Division.

A central component of the policy is the emphasis on continuous feedback, enabling managers and employees to engage in ongoing discussions regarding performance, development opportunities, and professional goals. Through regular performance discussions, the procedure ensures that employees receive constructive feedback and guidance to enhance their skills and competencies.

This policy is directly linked to the positive impact on Adequate Wages by integrating performance evaluation results with the remuneration and benefits system, ensuring that compensation reflects individual contributions and performance levels. It also strongly supports the positive impact related to Training and Skills Development by identifying employee development needs and recommending professional development plans, including training, specialization courses, online learning, and project participation. Additionally, the risk related to Training and Skills Development is addressed by ensuring that employees receive targeted skill enhancement opportunities to close potential knowledge gaps that could hinder career progression. At the same time, the opportunity related to Training and Skills Development is reinforced by encouraging employees to assess their career trajectories and proactively engage in professional development initiatives aligned with their long-term aspirations.

Through these mechanisms, the Procedure on Performance Management strengthens employee engagement, career growth, and workforce sustainability while supporting business performance and strategic objectives (*MDR-P 65-a*).

The Procedure on Performance Management applies to all employees within the Bank, creating a standardized process for evaluating professional objectives, attitudes, and behaviors. It provides a structured approach for setting and assessing performance expectations, allowing both employees and managers to engage in meaningful discussions about work contributions, challenges, and future goals.

A key aspect of the policy is its role in defining professional development objectives. During the evaluation process, managers collaborate with employees to establish individualized development plans, including training programs, specialization courses, and mentorship opportunities. This approach not only supports employees in their current roles but also prepares them for future positions within the Bank.

Additionally, the policy integrates permanent feedback mechanisms, encouraging managers to provide immediate recognition for exceptional performance or address areas requiring improvement in real time. This ensures that performance evaluations are not limited to a single annual event but form part of a continuous improvement cycle (*MDR-P 65-b*).

The Procedure on Performance Management is overseen by the General Director and the Head of the Human Resources Division, who are responsible for ensuring its proper implementation, alignment with organizational goals, and compliance with labor regulations. Their role includes reviewing evaluation processes, monitoring feedback mechanisms, and ensuring that performance-related compensation and professional development decisions are fairly executed across the organization (*MDR-P 65-c*).

The Procedure on Performance Management aligns with relevant labor regulations, including the Labor Code (Codul Muncii), ensuring that employee performance assessments adhere to legal frameworks governing employment rights, performance evaluations, and remuneration (*MDR-P 65-d*).

The Procedure on Performance Management is designed to support both employees and management by fostering a culture of continuous dialogue, professional development, and accountability. It creates a structured environment where employees and managers can jointly evaluate performance, identify development opportunities, and set career goals that align with business objectives.

By formalizing feedback mechanisms, the policy ensures that employees receive timely and constructive input on their performance, enabling them to address weaknesses, build on strengths, and plan their career progression within the Bank. At the same time, managers benefit from clear evaluation criteria and structured discussions, helping them guide and support their teams effectively.

Additionally, the policy integrates a reward and recognition system, linking performance evaluations to career development opportunities and remuneration structures. This ensures that employees who demonstrate strong performance and skill development are recognized and incentivized, fostering motivation and long-term engagement.

The Procedure on Performance Management is not publicly available but is internally accessible to all employees through the Human Resources Division. It is communicated to all staff before the annual evaluation process to ensure that employees and managers clearly understand the evaluation criteria, feedback mechanisms, and professional development opportunities available (*MDR-P 65-f*).

The Overtime Procedure

The Overtime Procedure establishes a structured framework for regulating overtime work, ensuring compliance with labor laws and promoting a balance between operational efficiency and employee well-being. The policy defines the approval process for overtime, compensation mechanisms for extra hours worked, and responsibilities of relevant personnel involved in managing the process.

Overtime is not encouraged by the Bank and is subject to strict approval procedures. Employees may work beyond regular hours only when justified by workload demands and deadlines. All additional hours, including hours worked on weekly rest days, legal holidays, or night shifts, must receive prior authorization from the Steering Committee, General Director or Deputy General Director upon request by the employee's direct or indirect superior.

The Overtime Procedure directly aligns with several IROs by ensuring a structured and fair approach to managing additional work hours. The positive impact related to Secure Employment is supported through guaranteed compensation for overtime, reinforcing job stability and fair employment practices. By strictly regulating overtime, the policy also addresses the risk related to Secure Employment through mitigation of the risks associated with overwork and burnout, ultimately reducing job dissatisfaction and employee turnover. Furthermore, the policy contributes to the opportunity pertaining to Secure Employment by offering employees financial incentives for additional work while ensuring their contributions are recognized. It establishes a clear structure for managing working hours, which directly supports the positive impact on Working Time by preventing excessive workloads and ensuring compliance with national labor laws.

To maintain a healthy work-life balance, the positive impact on Work-Life Balance is reinforced by enforcing strict approval processes for overtime, ensuring that excessive working hours are avoided, and employees can sustain a balance between professional and personal life. (*MDR-P 65-a*).

The Overtime Procedure applies to all employees across the Bank's network, including headquarters and branches, ensuring uniformity in the management of additional work hours. The policy clearly defines the conditions under which overtime may be permitted, limiting extra hours to legally acceptable thresholds in accordance with national labor legislation and the Internal Organization Regulation of Libra Internet Bank.

By requiring strict pre-approval for overtime, the Bank prevents excessive reliance on additional work hours and maintains operational efficiency without jeopardizing employee well-being. This policy is particularly relevant to employees, managers, and HR personnel, ensuring compliance with fair labor practices while balancing workforce demands (*MDR-P 65-b*).

The Overtime Procedure is overseen by the General Director and the Head of the Human Resources Division, who are responsible for ensuring compliance with the policy, monitoring overtime trends, and addressing any issues related to excessive working hours. Their role includes approving overtime requests, ensuring fair compensation, and maintaining workforce productivity while safeguarding employee well-being (*MDR-P 65-c*).

The Overtime Procedure adheres to the provisions of Law No. 53/2003 - Labor Code, which establishes legal regulations regarding working hours, overtime limitations, and employee compensation for extra work. By aligning with these regulatory frameworks, the Bank ensures compliance with labor laws while upholding ethical employment practices (*MDR-P 65-d*).

The policy safeguards employees from the risks of burnout and job dissatisfaction by ensuring that overtime remains an exception rather than the norm. Additionally, by mandating transparent discussions between employees and their managers regarding work schedules and compensation, the Bank reinforces fair employment practices, promoting an open and constructive work environment. Through these measures, the policy meets stakeholder expectations regarding responsible workforce management, fair labor practices, and sustainable human resource policies.

The Overtime Procedure is not publicly available but is internally accessible to employees through the Human Resources Division. Employees are informed of the policy's provisions through onboarding sessions, training programs, and internal communications to ensure clarity on overtime regulations and approval processes (*MDR-P 65-f*).

Procedure regarding recruitment and selection

The Bank is committed to fostering a secure and equitable working environment through structured policies addressing key workforce matters, including secure employment, work-life balance, social dialogue, and collective bargaining. Various measures and programs enhance job security, improve employee engagement, and uphold labor rights, with policies continuously monitored and revised to align with legal requirements and industry best practices. The Bank's recruitment and employment policies align with multiple Impact, Risk, and Opportunity (IRO) factors. Secure employment policies provide stable job opportunities (Positive Impact), though failure to address workforce concerns or high turnover rates poses a risk. Proactive career development strategies present opportunities for employee retention and engagement. The policy ensures fair hiring practices, promoting gender equality and equal pay for work of equal value (Positive Impact), and development programs present opportunities for career advancement. The Bank enforces strict policies against workplace violence and harassment, fostering a respectful work environment (Positive Impact), while strong data protection measures ensure employee privacy and compliance with legal requirements (Positive Impact). By continuously evaluating these IROs, the Bank ensures that its employment policies remain effective, mitigating risks while leveraging opportunities for workforce enhancement. *(MDR-P 65a)*

The Bank's recruitment and selection procedure covers all organizational levels (headquarters and territorial units), establishing a standardized framework for fair, inclusive, and merit-based hiring decisions. The policy applies to all employees and potential candidates within the Bank's operational reach. *(MDR-P 65b)*

The General Director and the Head of the Human Resources Division/Head of Recruitment Department oversee the implementation of the policy, ensuring alignment with corporate objectives, regulatory requirements, and workforce development strategies. *(MDR-P 65c)*

The Bank complies with multiple third-party regulations and standards as part of its recruitment policy, including Regulation No. 12/2020 on the authorization of credit institutions, Government Emergency Ordinance No. 99/2006 on credit institutions and capital adequacy, Regulation No. 2/2019 on the prevention and combating of money laundering and terrorist financing, and Law No. 53/2003 (Labor Code). These standards reinforce the Bank's commitment to legal compliance and ethical hiring practices. *(MDR-P 65d)*

The recruitment and selection procedure is designed with key stakeholders in mind, including the Bank's current and prospective employees. The recruitment procedure encourages internal career progression by promoting high-performing employees and facilitating internal mobility. Recruitment managers prioritize internal candidates for vacancies when qualifications are comparable. The Bank upholds principles of non-discrimination, equal opportunity, and data confidentiality, evaluating candidates based on merit, without discrimination. *(MDR-P 65e)*

The procedure is currently not publicly available, but it is accessible internally to ensure adherence among employees and recruitment managers. Stakeholders involved in implementing the policy receive adequate training and resources to uphold its principles effectively. *(MDR-P 65f)*

Internal Organization Regulation of Libra Internet Bank

The Internal Organization Regulation of Libra Internet Bank covers key aspects such as the fundamental values of the Bank, the rights and obligations of the Bank and its employees, disciplinary standards, the management of customer complaints/suggestions, risk management (including IT risk), employment relationships, occupational health and safety and emergency situations, staff recruitment, professional training and development, career and succession management, professional evaluation/performance management and underperformance management, teleworking, working hours, time off and leave, employee rewards and the benefits package, information confidentiality and conflict of interest, as well as other internal rules (e.g. communication, use of e-mail/IT systems, business travel). The Regulation establishes rules and responsibilities for the uniform conduct of activities and work discipline within the Bank, in accordance with the applicable legal framework, providing the foundation for the Bank to deliver high-quality banking services, and implicitly, to achieve a satisfactory level of profit.

The regulation directly supports the positive impact related to Secure Employment by establishing clear labor relations, defining employee rights and obligations, and ensuring stability in employment. Additionally, it mitigates the risk linked to Secure Employment by setting disciplinary procedures and performance management rules, reducing uncertainty regarding employment conditions. The opportunity pertaining to Secure Employment is also relevant, as the regulation includes provisions regarding career and succession management, with reference to the applicable internal framework.

Workplace security and employee well-being are further addressed through the positive impacts related to Working Time and to Work-Life Balance. The Regulation outlines the intervals and rules applicable to the work schedule, as well as the conditions regarding leave and rest time, in accordance with the applicable regulations and related internal procedures, contributing to a balanced professional and personal life.

Internal dialogue and fair treatment are supported through provisions regarding employment relationships, the principle of equity and equal treatment, and the prohibition of discrimination. The Regulation includes mechanisms for the amicable resolution of employment conflicts, employee requests or complaints, and describes communication and violation reporting channels (including the reporting of inappropriate behavior or suspicions of fraud to the relevant structures).

The Regulation aligns with the positive impact related to Health and Safety by establishing occupational health and safety regulations. The Regulation establishes provisions regarding occupational health and safety and emergency situations, including prevention, information, and training measures. Employees are required to participate in mandatory trainings, and the Bank ensures access to the occupational health medical service and pays the insurance contribution for work-related accidents and occupational diseases, as per the applicable legal framework. All of these provisions illustrate a commitment to employee well-being.

The rewards and benefits framework is addressed in the Regulation through the principles applicable to employee compensation and by reference to the internal remuneration and benefits policy. The Bank ensures fairness in wages and provides additional benefits beyond legal requirements, enhancing financial security for employees. Equality and fair treatment are prioritized under the positive impact related to Gender Equality and Equal Pay. The policy explicitly prohibits discrimination based on race, gender, religion, disability, or other protected characteristics. It ensures equal access to career development, promotions, and fair distribution of responsibilities, reinforcing a culture of diversity and inclusion.

Professional training and development are reflected through the employer's obligation to ensure access to professional training (through the annual professional development plan) and through the employees' right and obligation to participate in forms of professional training, under the conditions set by the relevant internal framework. The Regulation makes reference to the internal policy on professional training and development and separately includes provisions regarding career and succession management, as part of the professional development framework. The opportunity of employees to develop professionally on the basis of initiatives launched by the employer does not exclude the risk arising from their non-participation in continuous learning activities, a risk that may result in a skills deficit and, implicitly, in reduced workforce efficiency.

The Regulation prohibits discrimination (including harassment and victimization) and sets out obligations regarding behavior based on respect, professionalism, and good faith, with reference to the applicable internal framework. The Regulation provides mechanisms for reporting inappropriate behavior and includes provisions regarding work discipline, disciplinary offenses, and the investigation/sanctioning procedure, depending on the severity of the acts. Finally, the positive impact on Privacy is embedded in the regulations' confidentiality rules and data protection provisions. Compliance with GDPR and other regulations ensures that employee and customer data is handled securely and responsibly (*MDR-P 65a*).

The Internal Organizational Regulations define the main rights and obligations of the Bank and its employees, as well as norms of behavior and work discipline during working hours. Employees must comply with these regulations, and failure to do so may result in disciplinary or patrimonial liability. Regarding customer rights, the Bank ensures impartial handling. Any complaint, notification of negative events, or threats that may cause material damage must be reported immediately. Employees, coordinators, and managers must report inappropriate behavior or suspected fraud to their superior, the Risk Management Division, the Anti-Fraud Division, or, in extreme cases, the Management Committee. Employees must also respond to anomalies in information systems, and the Bank's internal ticketing system allows the registration of requests, documentation of solutions, and tracking of performance or risks. The Bank upholds fairness and equal treatment of employees and prohibits discrimination based on race, citizenship, ethnicity, gender, age, disability, chronic illness, sexual orientation, political affiliation, family situation, union activity, or other protected characteristics. Employees are provided with safe working conditions, social protection, and occupational health and safety measures, with dignity and non-discrimination ensured. The Bank ensures equal opportunities for recruitment, selection, employment, training, and promotion, and managers are responsible for fair task distribution. The Bank also develops health and safety procedures and requires employees to attend mandatory training. Employees have free access to occupational health services, and the Bank covers insurance contributions for work accidents and occupational diseases (*MDR-P 65b*).

The General Director and Head of the Human Resources Division are the most senior levels accountable for implementing the Regulation (*MDR-P 65c*).

The Internal Organizational Regulation complies with multiple laws and regulations, including Law No. 53/2003 (Labor Code), Decision No. 1500/2024 extending the Collective Labor Agreement in the banking sector, Government Decision No. 1425/2006 and its modifications concerning safety and health at work, Order No. 187/1998 on the organization and functioning of the Committee on Safety and Health at Work, Law No. 346/2002 on insurance against work accidents and occupational diseases, and Regulation (EU) 2016/679 (GDPR) (*MDR-P 65d*).

The Internal Organizational Regulation serves as the foundation for managing the Bank's resources in daily operations. Employees' rights and obligations are clearly defined, aligning with national and EU regulations. Beyond legal requirements, the Bank provides additional benefits to support work-life balance. The Regulation reflects the Bank's values and considers the interests of key stakeholders, including shareholders and customers (*MDR-P 65e*).

The Regulation is not publicly available (*MDR-P 65f*).

The policies apply to all employees and stakeholders involved in the Bank's operations.

Respect for Human Rights with regards to Own Workforce

Libra Internet Bank is committed to upholding human rights and labor rights across all workforce operations, ensuring compliance with Law no. 53/2003 (Labor Code) and other applicable labor regulations. These commitments align with the Bank's development strategy and the specific requirements of the banking sector (*S1-1.20*).

Key measures include non-discrimination, ensuring that employees are treated fairly regardless of race, gender, age, religion, sexual orientation, disability, or other protected characteristics. The Bank promotes fair wages and benefits by maintaining a transparent, performance-based remuneration system that upholds equity and non-discriminatory salary structures. Additionally, the Bank supports freedom of association and collective bargaining, encouraging employees to elect representatives and actively engaging in constructive dialogue to negotiate working conditions and benefits. To safeguard the workplace environment, the Bank has implemented measures against violence and harassment, with a comprehensive anti-harassment policy, regular training programs, and accessible grievance mechanisms, including whistleblowing channels. (*S1-1.20a*)

Engagement with the Workforce

The Bank prioritizes open and transparent communication with employees, promoting a culture of mutual respect and collaboration. Employees have multiple engagement channels, including regular communication through meetings, surveys, and feedback platforms that facilitate discussions about work-related concerns. Among the feedback channels accessible to employees are:

- ⇒ The reporting channel for the Ethics Officer / Reporting cases of harassment, available under the "Applications" section on the Bank's intranet.
- ⇒ The internal social networking application, Libra People.
- ⇒ Email channels directed to the Human Resources Division, through dedicated addresses depending on the topic (training, recruitment, payroll).
- ⇒ Direct intervention with higher hierarchical supervisors (encouraged by the Bank through the internal regulatory framework).
- ⇒ Direct communication with employee representatives (note: for the reporting period, the election of representatives was not finalized due to a lack of quorum).

Although the Bank does not have trade unions, employee representation is ensured through elected representatives who engage in regular dialogue with senior management. These representatives play a key role in negotiating and signing collective labor agreements

In 2025, due to the elections for employee representatives being concluded towards the end of the year, the Bank relied on the Collective Labor Agreement concluded at the level of collective bargaining sector 40 – Banking Activities. To promote democratic representation, the Bank provides logistical support for internal elections and allows representatives to conduct surveys, meetings, and consultations with employees to gather feedback. Proposals generated from these discussions are submitted to the Steering Committee for review, with the aim of promoting and implementing the most feasible suggestions. (S1-1.20b)

Remedy Measures for Human Rights Impacts

The Bank is committed to identifying and addressing any adverse human rights impacts arising from its operations. It has implemented robust grievance mechanisms that allow employees to report concerns anonymously and securely. All grievances are addressed promptly and fairly, ensuring compliance with internal policies and labor laws. The investigation and remediation process is managed by the Ethics Officer in collaboration with HR and other relevant divisions. Findings and recommended actions are reviewed and approved by the Executive Committee to ensure impartiality and adherence to due process. While no grievances related to human rights violations have been recorded, the Bank continuously monitors its workforce, partners, customers, and suppliers to proactively prevent human rights infringements. (S1-1.20c)

Libra Internet Bank's internal policies governing its workforce are aligned with both Romanian and European labor law requirements, ensuring a robust framework for employee rights, health, safety, and equality. These policies reflect a strong commitment to maintaining a compliant and ethical workplace, although they do not explicitly reference international frameworks or internationally recognized instruments, such as the UN Guiding Principles on Business and Human Rights. The Bank continuously reviews and updates its policies to meet stringent domestic regulations, and while it maintains a proactive approach in monitoring global best practices, any formal alignment with international instruments remains a potential consideration for future strategy. (S1-1.21)

The Bank's policies that govern own workforce do not explicitly address human trafficking, forced or compulsory labor, or child labor; however, they are designed to comply with all national and European labor laws which prohibit such practices, thereby ensuring a safe, fair, and ethically managed work environment. (S1-1.22)

Workplace Accident Prevention Policy

The Bank maintains a structured Workplace Accident Prevention Policy, which is outlined in the Policy for Security and Health at Work and Emergency Situations. This policy is built upon several key components to ensure a safe working environment. The Bank regularly conducts risk assessments to evaluate workplace hazards, updating findings as necessary to mitigate potential risks. Employees are trained in occupational health and safety and emergency situations, with introductory-general training and on-the-job training for new employees, delivered by occupational health and safety specialists and by workplace supervisors, and with biannual periodic training on workplace safety and emergency response, as well as monthly fire safety training for first-aid teams.

To reinforce safety procedures and controls, the Bank conducts biannual internal inspections at all locations to verify compliance with work safety and fire prevention measures. Additionally, the Bank monitors and reviews safety performance through comprehensive annual reports. The Annual Workplace Safety Report covers documentation compliance, accident statistics, and labor inspections, while the Annual Fire Protection Report assesses staff training, emergency planning, evacuation routes, and first-aid preparedness. These initiatives ensure the Bank's continuous compliance with legal and safety regulations, fostering a secure and well-prepared work environment for all employees (S1-1.23).

Non-Discrimination and Inclusion Policy Commitments

The Bank is committed to maintaining a workplace free from discrimination and harassment, ensuring that all employees are treated fairly, equitably, and in compliance with both local laws and international standards. It explicitly prohibits all forms of discrimination, harassment, and prejudicial behavior, whether verbal, physical, or visual. This includes any conduct that creates an intimidating, hostile, degrading, or offensive environment for employees, customers, casual workers, contractors, or visitors.

Discrimination based on race, ethnicity, nationality, language, religion, social category, beliefs, gender, sexual orientation, disadvantaged status, age, disability, refugee or asylum-seeker status, or any other legally protected characteristic is strictly prohibited. The Bank enforces a zero-tolerance policy for harassment and discrimination, treating all incidents with seriousness and urgency. Allegations are investigated promptly, and individuals responsible for such conduct face disciplinary, misdemeanor, or criminal consequences.

To ensure comprehensive protection, the Bank prioritizes key areas of workplace equality. Employees are protected against bias and discrimination based on race and ethnicity, fostering an inclusive environment. Gender equality is enforced in recruitment, career progression, and salary structures to promote fairness. Age-based discrimination is strictly prohibited, guaranteeing equal opportunities for growth and development for employees of all age groups. The Bank respects religious diversity and has policies in place to accommodate religious practices where necessary. Additionally, all employees, regardless of sexual orientation, are treated equally to maintain a discrimination-free workplace. (S1-1.24b)

Inclusion and Positive Action Commitments

The Bank is committed to fostering diversity and inclusion by actively promoting equitable opportunities for employees from groups at particular risk of vulnerability in the workforce. While there are currently no specific inclusion policies in place, the Bank upholds fundamental gender equality principles and supports employees from underrepresented groups.

For example, the Bank promotes equal opportunities for women by ensuring fair hiring and promotion practices, providing maternity leave, and supporting work-life balance policies that enhance career development. However, structured commitments beyond compliance with legal frameworks are yet to be established. (S1-1.24c)

Implementation of Non-Discrimination and Inclusion Policies

The Bank takes a proactive approach to ensuring non-discrimination and fostering diversity in the workplace. While formal diversity and inclusion commitments are not yet fully integrated into corporate policies, several mechanisms are in place to prevent, mitigate, and respond to discrimination. The Bank's stance on non-discrimination and equality is embedded in internal policies and compliance frameworks, ensuring that all employees understand their rights and responsibilities.

To reinforce an inclusive work culture, employees undergo regular training sessions on workplace ethics, anti-harassment policies, and diversity awareness. Additionally, the Bank actively monitors workplace incidents, reviews HR data on diversity metrics, and assesses potential gaps in inclusion efforts. Internal grievance mechanisms provide employees with a confidential avenue to report concerns anonymously, ensuring timely investigation and remediation.

While these measures contribute to a safe and inclusive working environment, the formalization of diversity and inclusion policies remains an area for future development. (S1-1.24d)

3.1.2.2. Processes for engaging with own workforce and employee' representatives about impacts

The Bank actively engages with its workforce through both direct engagement and worker representatives to ensure that employees' perspectives are considered in decision-making processes. Employee representatives gather feedback on various workplace matters, such as future benefits, employment conditions, and employee rights, which are then presented to the Board for review. In addition, direct engagement occurs through surveys, digital town hall meetings, and complaint channels, enabling employees to voice concerns and provide input, particularly on significant workplace changes, such as changing healthcare providers. (S1-2.27a)

While there is no set frequency for engagement activities, the Bank ensures regular and topic-specific workforce engagement through surveys and feedback sessions. Employee engagement is designed to be flexible and responsive to emerging workplace concerns. Feedback is systematically collected on specific initiatives, with all completed training sessions requiring standard post-training feedback surveys. This structured yet adaptable approach ensures that employee voices are consistently acknowledged. (S1-2.27b)

The engagement process is overseen by the Head of Human Resources, reporting directly to the General Director, who ensures that employee feedback is collected and used to inform strategic decisions. Additionally, employee representatives, who are freely elected, play a key role in gathering workforce input and advocating for employee concerns within the organization. Their responsibility includes presenting employee initiatives and feedback to management, ensuring that workforce perspectives shape workplace policies and conditions. (S1-2.27c)

The Bank does not currently have any Global Framework Agreements or other formal agreements with workers' representatives regarding human rights or labor rights. However, the Bank remains committed to fostering a fair and inclusive work environment through its existing engagement processes and compliance with national labor laws. (S1-2.27d)

To measure the effectiveness of workforce engagement, the Bank employs several assessment mechanisms to ensure a responsive and evolving approach to employee relations. Employee feedback is systematically reviewed through surveys, exit and stay-in interviews, and onboarding platforms. Insights gathered from this feedback are used to develop and implement targeted action plans that address key concerns raised by employees.

Additionally, the Bank continuously refines its engagement processes based on workforce responses and workplace developments, ensuring that strategies remain adaptive and effective. This commitment to ongoing improvement fosters a more engaged and satisfied workforce. (S1-2.27e)

Engagement with Vulnerable and Marginalized Workforce Groups

Currently, the Bank does not employ specific initiatives or dedicated channels to gather insights from vulnerable or marginalized workforce groups, such as women, migrants, or employees with disabilities. However, the Bank maintains an open and inclusive feedback system accessible to all employees, ensuring that all workforce members can voice their concerns without barriers. (S1-2.28)

3.1.2.3. Processes to remediate negative impacts and channels for own workforce to raise concerns

Considering that Libra Internet Bank has not identified any material actual negative impacts related to own workforce based on the double materiality assessment, the Bank does not report on the general approach and processes to provide remedy as it is not applicable. However, the Bank reports on its general processes to address workforce concerns below. (S1-3.32a)

The Bank provides employees with multiple channels to raise concerns regarding workplace issues, potential violations, or grievances. Employees may directly communicate with their supervisors, department heads, or designated HR representatives to discuss concerns. Additionally, the Bank operates an anonymous reporting mechanism, allowing employees to report potential or actual violations of regulatory or internal requirements through an independent and autonomous whistleblowing channel. This mechanism is specifically designed to protect employee confidentiality and prevent retaliation. Employees also have the opportunity to report violations of law, misconduct, or ethical concerns through a dedicated channel accessible via the internal platform. Furthermore, under the Open Door Policy, employees can directly approach members of the Executive Board via email, Microsoft Teams, or in person to discuss issues or concerns. (S1-3.32b)

Libra Internet Bank has a structured grievance handling mechanism that ensures fair and impartial review of employee complaints. Trained HR personnel, along with the Ethics Officer, oversee the grievance process to maintain consistency and transparency. Employees may submit grievances through the whistleblowing channel, handled exclusively by the Ethics Officer. Complaints related to violations of the Code of Ethics, internal policies, or legal provisions are reviewed promptly, with whistleblowers receiving feedback on the findings and corrective measures taken. All complaints and resolutions are documented and tracked, ensuring proper follow-up and monitoring of outcomes. (S1-3.32c)

The Bank actively promotes awareness of reporting channels through employee training and communication initiatives. Employees are educated on how to access reporting channels, the importance of raising concerns, and their rights regarding grievances and whistleblowing. Reporting channels are designed to be easily accessible through the internal platform, where employees can submit reports related to internal violations, workplace misconduct, or legal infractions. These structured grievance mechanisms enhance accessibility and encourage employees to report concerns without fear of retaliation. (S1-3.32d)

To ensure transparency and accountability, the Bank employs tracking mechanisms to monitor reported grievances. The whistleblowing channel maintains auditable records of all complaints, including timestamps, status updates, and resolution details. Alerts are automatically triggered for pending cases, ensuring timely follow-up. Employees who submit reports through the whistleblowing system receive notifications regarding the status of their complaint and the final resolution. The Bank also engages in continuous process improvement, with annual reviews of the Code of Ethics and Anti-Harassment Policy to assess the effectiveness of existing grievance mechanisms and compliance with evolving legal requirements. (S1-3.32e)

The Bank actively ensures that employees are aware of, and trust, the reporting structures in place. Annual training sessions reinforce the Bank's commitment to ethical conduct and transparency. Additionally, the Ethics Officer sends out periodic communications every six months to remind employees of ethical principles, grievance procedures, and their rights. Employee trust in these processes is strengthened by the Bank's commitment to resolving complaints efficiently and providing continuous feedback to whistleblowers regarding corrective actions taken. The effectiveness of these reporting structures is also assessed through employee surveys, exit interviews, and feedback mechanisms.

The Bank upholds strict non-retaliation policies as part of the Banking Code of Ethics. Employees who report concerns in good faith are protected from any form of retaliation, including contract suspension, termination, demotions, salary reductions, job reassignment, or workplace discrimination. The Bank ensures compliance with anti-retaliation policies through regular audits, policy awareness training, and external oversight. If violations are identified, employees are entitled to remediation actions, such as reinstatement or compensation. In cases where legal violations are reported, findings are escalated to the National Bank of Romania or relevant legal authorities, providing an extra layer of protection for whistleblowers. (S1-3.33)

3.1.2.4. Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Secure Employment

Continuous monitoring of employee turnover at the organizational level, with a goal in 2025 to maintain overall turnover at a maximum of 12% (excluding the probation period) maintaining staff turnover in the first year of employment at a maximum of 5%.

The Bank uses a Power BI dashboard to track daily turnover at all organizational levels, holding managers accountable for turnover rates in their departments. At the same time, the Applicant Tracking System (ATS) ensures the streamlining of the recruitment process and enables HR teams to focus on candidate quality.

The Bank has also continued to carry out banking academies programs to train potential hires in advance, effectively reducing gaps in staffing. Investment in continuous training remains a priority, with a focus on both boarding and ongoing employee development. This direction is also highlighted by the attention given to the development of colleagues in managerial roles, both from the Head Office and from the Branch network, who are involved in specific training programs under the umbrella of the Next Level Academy. The Bank has continued the development of interactions within the communication & engagement platform in order to improve collaboration, information, the visibility of information, and the development of intra-organizational communities. The Bank launched a new cohort of the mentoring program, following the structure accredited by EMCC Global, which aims at developing leadership skills, while simultaneously developing a pipeline of future managers within the organization.

These initiatives apply to all employees across all Bank locations, impacting recruitment, training, and career development strategies. Ongoing daily monitoring of staff turnover and annual evaluations of managerial performance ensure sustained progress. While these actions primarily focus on proactive strategies, they also serve as indirect remedies by addressing employee dissatisfaction and disengagement. The Power BI monitoring tool has provided valuable real-time insights, and the ATS has improved recruitment efficiency. The revised salary scale has led to better talent retention, while the EMCC Global-certified mentoring program has positioned the Bank as an industry leader in employee development. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Working Time

Continuous monitoring of legal requirements, industry-wide collective agreements, and internal needs to provide employees with the best possible workplace experience.

The Bank is committed to ensuring compliance with legal requirements and collective labor agreements, while offering employees flexibility in work arrangements. Established regulations govern working hours across headquarters, branches, and other departments. A flexible work-from-home policy allows employees at the central office to work remotely for up to 5 days per month, and certain employees from 50% up to 100% of the time. Employees are also entitled to personal leave of up to eight hours per month and flexible start and end times on Mondays and Fridays.

All working conditions are clearly outlined in employment contracts and accessible via the Bank's intranet. These policies apply to all employees, with remote work options tailored to departments where operational efficiency permits. The work-from-home policy is regularly assessed, while personal leave and adjusted work hours are reviewed annually. The flexible work structure mitigates potential employee dissatisfaction caused by rigid schedules, enhancing work-life balance. Employee surveys indicate high satisfaction with the Bank's flexible policies, demonstrating their effectiveness in improving morale and productivity. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Work-Life Balance

Implementation of measures and programs to support and maintain a positive work-life balance for employees.

The Bank has implemented a comprehensive work-life balance strategy that includes differentiated annual leave (depending on length of service), personal and caregiver leave. Employees can access caregiver leave for up to five days per year to support family members with serious medical issues. Additionally, paid leave is available for education, marriage, childbirth, and bereavement. These regulations apply across all Bank locations and can be accessed by all employees. Leave procedures are continuously reviewed and adjusted in response to regulatory updates, while well-being programs, including Libra HARMONY, are planned annually with specific events scheduled throughout the year.

By providing leave options for personal matters, the Bank ensures employees can manage significant life events without work-related stress. Surveys and participation rates inform ongoing enhancements to well-being initiatives. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Additionally, the Bank has developed the Libra Harmony program to advance employee well-being and as a key aspect of corporate culture. This initiative comprises both virtual and on-site components, covering mental, physical, and social health. Employees have access to a range of activities, including massage sessions, wellness masterclasses, and workshops focused on topics such as stress management and relationship skills. By emphasizing well-being as an institutional priority, the program reduces workplace stress, promotes work-life balance, and encourages personal development. The initiative applies to all employees and is integrated into broader human resources planning. While not a direct response to any specific adverse impacts, it functions preventively and is monitored through feedback and engagement rates, which show a growing level of participation and satisfaction. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Complementing the wellness strategy, the Libra Energize program is a long-standing initiative that encourages physical health and camaraderie through sport. It is structured as a multi-phase competition with events such as running, swimming, mountain biking, and orienteering. Participation is voluntary and attracts employees from various departments and locations. The program not only promotes physical fitness but also facilitates teamwork and informal networking across units. It aligns with the Bank's corporate culture objectives under the "Physical" pillar and serves as a proactive health and morale initiative. Although not connected to specific remedies or incidents, it is part of the broader effort to enhance employee resilience and organizational engagement. Its regular recurrence and steady growth in participation serve as indicators of success. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

"Share Your Hobby" is another program that actively contributes to the implementation of the wellness strategy at organizational level. The program takes place quarterly, during one week of each quarter, covering activities characterized by interactivity between employees and encouraging the development of communities around shared passions. The sessions are offline, at the head office, providing employees from different structures with the opportunity to collaborate, learn new things, and build stronger relationships that can be positively translated into their professional activity.

Social Dialogue

Fostering a culture of open communication and transparency through multiple employee engagement channels. The Bank promotes a culture of open communication and transparency through multiple employee engagement channels. Regular manager-employee meetings facilitate direct discussions on workplace issues. An internal communication platform allows employees to address concerns and ask the management questions. The collective labor contract negotiation process further promotes structured dialogue, ensuring transparent decision-making and employee participation in organizational discussions.

The initiatives apply to all employees across all Bank locations, providing access to communication tools regardless of position or location. These engagement strategies are continuous, while collective labor contract negotiations occur once every two years. Through these open communication channels, the Bank effectively resolves workplace issues and fosters trust between employees and leadership. High employee participation in dialogue platforms demonstrates their effectiveness in enhancing engagement. The structured communication approach has resulted in improvements in workplace policies based on employee feedback. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Freedom of Association and Employee Representation

Annual review of HR policies and internal regulations, ensuring that provisions for freedom of association, consultation, and employee participation rights are clearly defined.

The Bank ensures employees' rights to freedom of association and participation in labor-related decisions. While there is no official works council, the Bank adheres to industry-wide collective labor agreements and internal policies that stipulate employee rights.

In 2025, towards the end of the year, elections for employee representatives were organized, through which 3 representatives were validated. Employee surveys are conducted annually to gather feedback for policy improvements. These policies impact all employees by providing a structured approach to worker representation and labor rights. While no reported abuses occurred, the Bank remains committed to ensuring compliance with labor laws and industry agreements. Employee feedback on the Bank's approach remains positive, showing strong support for labor rights initiatives. The adherence to sector-level agreements ensures fair and transparent labor relations despite the absence of an internal collective labor agreement. (MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Collective Bargaining, Including Rate of Workers Covered by Collective Agreements

Initiating negotiations for the renewal of the Collective Bargaining Agreement (CBA)

In 2025, towards the end of the year, elections for employee representatives were organized, through which 3 representatives were validated. Until the completion of the negotiations and the signing of a new collective labor agreement at the level of the institution, the Bank continues to fully adhere to the industry-level collective labor agreement, ensuring that all employees benefit from the same labor protections and rights. Ongoing communication and training sessions inform employees about their rights under the agreement and promote understanding of the collective bargaining process. These actions aim to maintain compliance with labor laws, ensure equitable treatment across all employee categories, and foster a stable and transparent work environment. (MDR-A-a)

These actions apply to all employees across all branches and divisions of the Bank, irrespective of their seniority or specific roles. By integrating the sector-wide collective labor agreement into the Bank's internal policies and procedures, the institution ensures standardized labor protections for every employee. Collective bargaining policies are consistently communicated and implemented across all departments, keeping the workforce informed and engaged in labor-related matters, thereby strengthening overall labor relations within the Bank and ensuring compliance with national labor regulations. (MDR-A-b)

The implementation of these actions is an ongoing process, with structured annual reviews to assess policies effectiveness and identify areas for improvement. The Bank continuously monitors changes in labor regulations and updates its internal procedures accordingly. Annual training and communication efforts regarding collective labor agreements ensure that employees are aware of their rights and obligations, and future elections for employee representatives will be organized in compliance with labor laws. (MDR-A-c)

To address any potential grievances related to employment terms and labor rights, the Bank has established formal mechanisms for dispute resolution. Employees can file complaints or raise concerns through structured channels, ensuring that all disputes are handled fairly and efficiently. These mechanisms are designed to prevent labor conflicts and resolve any disputes related to collective agreements in a transparent and equitable manner. Although no specific remediation actions were required in 2025 due to the absence of a finalized collective agreement, the Bank's adherence to the industry-wide labor agreement ensures that employees continue to receive all applicable benefits and protections. (MDR-A-d)

The integration of the sector-wide collective labor agreement into the Bank's internal policies has been successfully maintained, with a high level of compliance reported across all business units. Employee feedback collected through feedback mechanisms indicates strong awareness and appreciation of collective labor rights. The Bank continues to refine its communication and training efforts based on employee input, ensuring that all staff members fully understand their rights under the agreement. The proactive approach demonstrates the Bank's commitment to fair labor practices and transparent employee relations, despite the absence of a company-specific collective agreement. (MDR-A-e)

Health and Safety*Implementing comprehensive health and safety measures*

The Bank's health and safety measures apply to all employees across all locations, regardless of their department or role. The actions taken include comprehensive safety training for new hires and current employees, regular safety audits at all the Bank's locations and headquarters, and rigorous enforcement of internal health and safety policies. Employees receive ongoing updates on safety protocols, ensuring compliance with national regulations and internal occupational health standards, directly impacting all employees' safety and overall well-being. (MDR-A-a, b)

The Bank is committed to workplace health and safety, with specific measures such as training sessions, safety audits, and policy updates whenever necessary. Additionally, the Bank conducts a full review of its health and safety procedures as needed to ensure continuous compliance with evolving safety regulations. These proactive measures ensure that all employees remain informed, trained, and prepared for potential workplace risks. (MDR-A-c)

In 2025, one single commuting work accident was reported, which resulted in the temporary incapacity to work of the employee involved. The Bank has solid procedures, its own occupational health and safety instructions, and corrective measures to prevent future work accidents. Employees are also encouraged to report unsafe conditions without fear of retaliation, ensuring that risks are identified and mitigated before they result in incidents. This proactive incident response system ensures that any emerging safety concerns are promptly addressed. (MDR-A-d) . Continuous safety improvements and policy enhancements ensure that the Bank prioritizes occupational health and safety, maintaining a safe workplace that prioritizes employee well-being and risk prevention. (MDR-A-e)

Adequate Wages*Implementing a structured and transparent remuneration policy*

The Bank has implemented a structured and transparent remuneration policy that ensures fair and competitive wages across all employee levels. This policy includes a transparent salary scale which includes a minimum and maximum salary range stipulated for each role, and a performance-based bonus system to reward exceptional employee achievements. Libra Internet Bank was the first commercial bank in Romania to publish the salary levels for each promoted role in its recruitment announcements. The Bank continues to comply with the European Directive on pay transparency in the display of salary ranges in recruitment announcements. The annual review of salary structures is a fundamental aspect of the Bank's remuneration policy, ensuring that wages remain competitive within the Romanian banking sector. Planned actions include continuous assessment and revision of the remuneration policy to align with economic fluctuations, market benchmarks, and evolving labor conditions. The expected outcomes are to enhance employee satisfaction, attract and retain top talent, and uphold fair compensation practices that align with both performance and financial sustainability. (MDR-A-a)

These remuneration policies apply to all employees, from entry-level positions to senior management, ensuring a fair and equitable compensation structure across the organization. The transparent salary scale and publicly disclosed salary levels in recruitment processes foster trust, accountability, and openness in wage determination, reinforcing equal pay and performance-driven incentives, and salary progression based on clear criteria. By maintaining a structured and transparent wage system, the Bank promotes financial stability and long-term career development for employees. (MDR-A-b)

The Bank's remuneration policy undergoes an annual review, ensuring that salary scales, bonuses, and incentives remain aligned with market standards and the Bank's financial performance. This process involves regular assessments of industry benchmarks; feedback collected during the internal stay interview and exit interviews discussions with the Bank's employees and adjustments based on economic indicators. The transparent salary disclosure practice in recruitment is an ongoing initiative, reinforcing the Bank's commitment to equitable pay and fair hiring processes. (MDR-A-c)

To address potential wage-related grievances or discrepancies, the Bank has established formal procedures that allow employees to raise concerns and seek resolution in a structured and confidential manner. Employees have direct access to HR support and a formal grievance mechanism to ensure that all compensation-related concerns are reviewed promptly, fairly, and transparently. This process safeguards employee trust in the Bank's wage policies, ensuring that remuneration remains free from discrimination, bias, or misalignment with industry standards. (MDR-A-d)

The annual review of the remuneration policy has led to competitive salary adjustments that align with the broader banking market, ensuring fair compensation and market relevance. The publication of salary levels in job postings has strengthened the Bank's reputation for transparency, attracting talent and reinforcing internal trust in compensation practices. Employee feedback indicates strong approval of the salary structure, with a high retention rate linked to fair remuneration and financial incentives. Additionally, the performance-based bonus system has effectively motivated employees, resulting in increased productivity and engagement. These structured wage practices demonstrate the Bank's ongoing commitment to fair, transparent, and competitive remuneration, fostering a satisfied and motivated workforce. (MDR-A-e)

Gender Equality and Equal Pay for Work of Equal Value

Implementing policies to ensure gender equality and equal pay for work of equal value

The Bank has implemented robust policies to ensure gender equality and equal pay for work of equal value, reinforcing its commitment to fairness and inclusivity. Salary differentiation is based on objective criteria, including the significance of each role, relevant educational background, expertise, and personal competencies, rather than gender or any other non-performance-related factor. The Bank adheres strictly to the principle of equal treatment, ensuring that male and female employees receive equivalent remuneration for the same or equally valued work, without discrimination based on gender, nationality, or age. Planned actions include ongoing adherence to gender equality policies, further enhancing compensation strategies, and conducting salary surveys and performance-linked pay structure evaluations to maintain alignment with market standards, aiming to reduce gender pay gaps, and enhance its employer brand by positioning itself as an equitable and progressive workplace. (MDR-A-a)

These gender equality and equal pay policies apply to all employees across all levels, departments, and locations of the Bank. The policies ensure that all employees benefit from transparent and fair compensation practices. The impact extends beyond internal equity, influencing recruitment, retention, and overall employee satisfaction, while also ensuring compliance with regulatory and ethical standards related to gender pay equity. (MDR-A-b)

The Bank's gender equality and pay equity policies are ongoing initiatives, with annual monitoring and adjustments to reflect market trends, regulatory changes, and internal evaluations. The periodic review of compensation structures through salary studies and recruitment feedback is conducted annually, ensuring that the Bank remains competitive and responsive to evolving workforce expectations and industry standards. These consistent assessments help maintain a well-balanced and equitable pay structure over the long term. (MDR-A-c)

In cases where discrepancies in pay or gender-based inequities are identified, the Bank has established internal mechanisms to address and resolve such issues efficiently. Employees can report concerns through formal grievance procedures or seek HR support for mediation and resolution. These measures ensure that any gender-related pay imbalances are rectified promptly, reinforcing the Bank's commitment to an inclusive and discrimination-free workplace. This proactive approach also mitigates legal risks and upholds best practices in workplace equity. (MDR-A-d)

The Bank's gender equality and equal pay policies have demonstrated strong effectiveness, with internal audits confirming consistent salary distributions aligned with market benchmarks and non-discriminatory pay practices. These insights, combined with data from external salary studies, have guided ongoing refinements to the Bank's remuneration structure, ensuring continued fairness and competitiveness.

Through these structured initiatives, the Bank sets a benchmark for gender equality in the financial sector, actively promoting fair pay and equal opportunities for all employees. By maintaining a transparent and unbiased compensation system, the Bank continues to foster a diverse, inclusive, and progressive workplace, ensuring that all employees feel valued, respected, and equitably rewarded for their contributions. (MDR-A-e)

Training and skills development

Establishing a comprehensive annual development plan

The Bank has established a comprehensive annual development plan to enhance employee skills and knowledge, ensuring continuous professional growth and alignment with strategic business objectives. This plan encompasses a wide range of training and development sessions, including induction and integration programs for new employees, professional development courses delivered by external providers in both online and classroom formats, and internal training covering specialized banking operations, financial analysis, legal matters, and soft skills development. To provide flexible learning opportunities, the Bank leverages both e-learning platforms such as LinkedIn Learning, Coursera, Udemy, eDx, Pluralsight, and Alisson without being limited to these, as well as the internal training platform Libra Internet Bank LMS. Additionally, role-specific training sessions are regularly conducted for both branch and head office employees, supplemented by team-building activities designed to foster a cohesive and collaborative work environment. The expected outcomes of these initiatives include increased employee competency, improved job performance, enhanced engagement, and the establishment of a continuous learning culture within the organization. (MDR-A-a)

These training and skills development initiatives apply to all employees within the Bank, spanning across all departments, hierarchical levels, and locations, from entry-level employees to senior management. The scope includes both mandatory and optional training, ensuring that all employees have equal access to resources that allow them to develop professionally and adapt to industry advancements. The initiatives directly impact various stakeholders, including employees, HR teams, and business leaders, by providing the workforce with the skills required to support business objectives, regulatory compliance, and innovation. (MDR-A-b)

The training and development activities are structured annually, with specific sessions scheduled throughout the year to ensure continuous learning and alignment with the latest industry trends, technological advancements, and internal strategic goals. The annual review of training policies allows for regular updates and adjustments to the training content and methodologies, ensuring they remain relevant and effective. The Bank remains committed to enhancing the learning experience, continuously improving training strategies to support both individual career growth and business success. (MDR-A-c)

In cases where gaps or deficiencies in employee training are identified, the Bank provides additional support and resources to address these issues. Measures include supplemental training sessions, one-on-one coaching, access to additional e-learning resources, and personalized learning pathways based on performance assessments. These efforts ensure that employees achieve the required competency levels and are fully equipped to contribute to the Bank's objectives, thereby enhancing operational efficiency and service quality. (MDR-A-d)

Feedback from employees and post-training performance assessments indicate high levels of satisfaction and knowledge retention, with quantifiable improvements in operational efficiency and customer service linked to training initiatives. Quantitative data from learning management systems (LMS) provide insights into participation rates, completion rates, and the effectiveness of different training modules, which guide ongoing improvements to training programs. The Bank's investment in training and development has contributed to a highly skilled workforce that is aligned with organizational goals, regulatory requirements, and industry best practices. Through these structured training programs, the Bank ensures that employees remain competitive, knowledgeable, and capable of driving long-term business growth and innovation. (MDR-A-e)

Measures against violence and harassment in the workplace

Establishing and implementing a dedicated Policy against Harassment

The bank has established and implemented a dedicated Policy against Harassment, fully aligned with Government Decision No. 970/2023, which outlines the Methodology for preventing and combating harassment based on sex and moral harassment at work. This policy is designed to ensure that all employees, regardless of their gender, background, or position, are entitled to a safe and respectful work environment free from violence, discrimination, and harassment. The primary objective of this policy is to promote equal opportunities and fair treatment between men and women in the workplace, ensuring that no individual is subjected to intimidation, sexual harassment, or any form of workplace violence. By enforcing this policy, the Bank actively fosters a culture of respect, inclusivity, and dignity, emphasizing that all employees have the right to work in an environment that is supportive, transparent, and free from hostility. (MDR-A-a)

The scope of the policy covers all employees across the Bank, regardless of their location, hierarchical level, or department. It applies universally to head office and branch employees, as well as external contractors and third-party partners who interact with the Bank's workforce. The policy ensures that all employees are aware of their rights and responsibilities in preventing and addressing workplace harassment. Additionally, it extends to HR representatives, compliance officers, and the Ethics Officer, who play a crucial role in monitoring, implementing, and enforcing the policy across all operational areas. (MDR-A-b)

The implementation of this policy is an ongoing initiative, with continuous monitoring and enforcement mechanisms in place. Employees undergo mandatory training sessions on workplace harassment and violence prevention, ensuring that they fully understand acceptable workplace behaviors, reporting mechanisms, and their rights under the policy. The Ethics Officer reinforces these principles biannually, sending reminders to all employees about the importance of ethical workplace behavior and the available reporting channels. The complaint registration system has been permanently integrated into the Bank's intranet, providing employees with a confidential, secure, and easily accessible platform to report concerns or incidents. *(MDR-A-c)*

In cases where allegations of harassment or workplace violence arise, the Bank has a clear grievance and remediation process in place. Employees can confidentially submit complaints via the intranet Libra Home platform, which are immediately reviewed by the Ethics Officer. Investigations are conducted thoroughly and impartially, ensuring that every reported case is handled with discretion, fairness, and due process. *(MDR-A-d)*

By consistently monitoring training participation rates, the frequency of reported cases, and employee awareness levels, the Bank ensures that its anti-harassment measures remain robust and impactful. *(MDR-A-e)*

Privacy

Adopting a comprehensive data protection framework

To ensure compliance with EU Regulation No. 679/2016 (GDPR) concerning the protection of individuals' personal data and the free movement of such data, Libra Internet Bank has adopted a comprehensive data protection framework. This includes the Personal Data Processing Procedure, and the Policy on the Processing of Personal Data, all of which apply to employees, partners, associated operators, and authorized persons. These policies outline the legal basis for data processing, the rights of data subjects, security measures, and the procedures for handling personal data. The Policy on the Processing of Personal Data is publicly available on the Bank's official website, ensuring transparency in how data is collected, stored, and processed. The core objective of these policies is to establish internal controls and promote best practices regarding GDPR compliance to safeguard information and uphold regulatory requirements. *(MDR-A-a)*

The scope of these data protection initiatives extends across the entire Bank, covering all employees, departments, and business units, as well as external stakeholders, including clients and third-party service providers. Every aspect of data collection, processing, and storage must comply with GDPR requirements, ensuring that personal data is handled ethically, securely, and transparently. By maintaining high privacy standards, the Bank strengthens its reputation, builds customer trust, and enhances employee confidence in the organization's commitment to data security. Additionally, this proactive approach to data protection minimizes legal and financial risks, particularly considering the significant fines and reputational damage associated with GDPR violations. *(MDR-A-b)*

The implementation of key data protection measures is an ongoing effort, with strict compliance monitoring and regular updates to internal policies and practices. The Data Protection Officer (DPO) is responsible for reviewing all data privacy requests, including contracts signed with partners and suppliers. Each project or contractual agreement must be advised and approved by the DPO through a dedicated compliance channel. The Bank has also implemented mandatory privacy clauses in all client contracts and ensures that customers receive the necessary data protection information before any data processing begins. Additionally, the DPO actively participates in internal projects and advises on banking policies and procedures that impact data processing, ensuring that all internal operations remain GDPR-compliant. *(MDR-A-c)*

To further enhance data security and privacy compliance, the bank has established a robust training program for employees. GDPR training sessions are mandatory during onboarding for new employees and are repeated annually, with ongoing knowledge testing to ensure that employees understand their responsibilities regarding data protection. Training materials are available via an online learning platform, making them easily accessible to all employees. To reinforce compliance awareness, the DPO provides continuous guidance and updates on GDPR regulations, advising employees on best practices and security measures when handling personal data. Internal tests are conducted periodically to assess employee understanding of data privacy principles and ensure adherence to legislative and internal data protection policies. *(MDR-A-d)*

The Bank conducts annual security inspections across its headquarters and branch locations to monitor, investigate, and take corrective measures in response to potential security incidents. These inspections are part of a pre-approved plan, to ensure continuous improvement of processes and elimination of data security risks. The effectiveness of these GDPR compliance measures is assessed continuously by internal and external parties. By implementing these controls, Libra Internet Bank ensures that personal data is handled lawfully, securely, and in alignment with European data protection standards, safeguarding employees, customers, and business partners from data breaches and cybersecurity threats. *(MDR-A-e)*

Financial Resources Allocated to Action Plans

The Bank incorporates all financial resources for various action plans into the general budgeting process of their respective owners, eliminating the need for separate budget lines for each initiative. This approach ensures that operational (OpEx) and capital expenditures (CapEx) for each initiative are aligned with the Bank's overall financial planning and strategic goals. Given this structure, no specific sustainable finance instruments such as green bonds, social bonds, or green loans have been allocated exclusively for these action plans. Additionally, the execution of these plans is not contingent upon external preconditions, such as government financial support, public policy changes, or significant market developments. All actions are self-financed and integrated within the Bank's operational framework. *(MDR-A.69(a))*

Since these action plans are embedded within the Bank's broader financial strategy, there is no separately disclosed number of financial resources allocated exclusively for their implementation. The most relevant financial allocations are reflected in the Bank's general financial statements, where expenses related to employee engagement, training, operational development, and compliance initiatives are included under HR, IT, and administrative budgets. Any expenditures required for action plans are accounted for as part of the normal course of business operations rather than as independent financial allocations. *(MDR-A.69(b))*

There are no future financial resources separately earmarked for these action plans, as they continue to be funded through the Bank's standard budgetary planning. If necessary, the Bank may adjust financial allocations within its annual budget reviews to ensure that operational and strategic objectives are met efficiently. Given this integrated financial management approach, the bank does not maintain dedicated capital expenditure (CapEx) or operational expenditure (OpEx) allocations for individual action plans. *(MDR-A.69(c))*

Resources Allocated to the Management of Material Impacts

The Bank allocates significant resources to the training and education of employees, ensuring that all personnel are well-equipped to understand and manage material impacts in their respective areas of responsibility. These resources are allocated annually through the Bank's budgeting process, with specific allocations assigned to Compliance, HR, Administrative Divisions, and the Data Protection Officer (DPO). This structured approach guarantees that all departments responsible for managing material impacts receive the necessary financial and human resources to implement effective policies and procedures. *(S1-4-43)*

The workforce needed for managing material impacts is determined by the size of the Bank and the scale of impact for each topic, ensuring that sufficient personnel and expertise are in place to monitor, prevent, and mitigate any negative effects. Training initiatives, compliance monitoring, and risk management strategies are regularly reviewed and updated to maintain effectiveness. Additionally, each division plays a crucial role in ensuring that material impacts related to employment conditions, ethical banking practices, regulatory compliance, and workforce well-being are systematically addressed and integrated into daily operations. This structured allocation of resources reflects the Bank's commitment to proactive impact management and continuous improvement across all operational levels. (S1-4-43)

In cases where the Bank has not yet adopted specific actions regarding certain material impacts, it discloses any potential gaps in policy implementation, workforce allocation, or financial resource allocation under S1-3.34. However, the Bank continuously evaluates the need for further actions and remains committed to enhancing its material impact management framework through ongoing policy reviews, stakeholder engagement, and strategic resource planning. (ESRS 2.62, S1-3.34)

3.1.3. Metrics and targets

3.1.3.1. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Targets for Managing Material Impacts, Risks, and Opportunities

The Bank follows a structured approach in setting measurable, outcome-oriented, and time-bound targets to assess progress in managing material impacts, risks, and opportunities related to its own workforce. Based on internal reviews and monitoring, all assessed impacts on our employees as part of the Double Materiality Assessment have so far resulted in overall positive outcomes. Notwithstanding these favorable results, the Bank remains committed to monitoring employee wellbeing, engagement, development, and workplace safety through established processes and systems; however, no formal targets have been established to manage workforce-related impacts, risks and opportunities. Nevertheless, the Bank continuously reviews its approach and will reassess this matter following future DMA exercises to determine if new quantified targets are necessary for workforce-related material impacts. The process includes ongoing monitoring, internal reviews, and stakeholder consultations to ensure that the Bank remains proactive in its sustainability commitments. The Bank remains committed to evaluating workforce-related risks and opportunities and will establish measurable targets should future materiality assessments indicate a need for intervention. Regular policy updates, stakeholder engagements, and sustainability reporting frameworks ensure that any future targets will be well-integrated into the Bank's operational and strategic goals. (S1-5-46)

Given the fact that no formal targets have been set to manage workforce-related IROs, no stakeholder engagement took place with this intent. This will be considered by Libra Internet Bank when reassessing whether new quantified targets are necessary for workforce-related material impacts for future reporting periods. (S1-5-47) The minimum disclosure requirements regarding targets are not applicable for the Bank considering that targets have not been established.

Tracking the Effectiveness of Workforce-Related Targets

Although the Bank has not set measurable, outcome-oriented targets specifically related to its workforce, it actively tracks the effectiveness of its policies and actions to manage material sustainability-related impacts, risks, and opportunities. The monitoring process includes quantitative and qualitative indicators that assess workforce stability, professional development, and compliance with internal training requirements. These efforts align with the Bank's commitment to continuous improvement and risk mitigation.

One of the key workforce indicators the Bank monitors is employee turnover, which is analyzed both at the organizational and team levels. This metric is tracked via Power BI reports, allowing real-time monitoring of workforce dynamics. To reinforce awareness and accountability, turnover has been integrated as a Key Performance Indicator (KPI) within the following evaluation processes:

- ⇒ Managerial Performance Evaluations consider employee turnover at the level of the respective coordinated structure. Performance thresholds are structured as follows: a turnover of at least 40% results in achieving 50% of the objective, 30-40% turnover corresponds to 75% objective achievement, 20-29.9% turnover corresponds to 85% achievement, while <20% turnover results in full (100%) objective achievement. This approach ensures that managers actively engage in reducing turnover and fostering a stable workforce. Similarly, in HR Team and HR Director evaluations, the same turnover KPI is applied at the entire bank level, holding HR leaders accountable for managing workforce retention and employee engagement.

In addition to staff turnover, the Bank systematically tracks professional development through an Annual Professional Training Indicator, ensuring that each employee completes a minimum of 8 hours of training per year, directly proportional to the period worked during that year, with the exception of OSI, which has a minimum requirement of 16 hours of training per year. This requirement is embedded into performance evaluations, reinforcing the commitment to continuous learning and ensuring alignment with organizational sustainability commitments. Managers monitor compliance with this indicator during annual performance reviews, ensuring that all employees meet their professional development goals.

The Bank also conducts Annual Training and Testing Sessions within a predefined evaluation period, as per internal procedures. These sessions cover essential topics such as compliance, operational risk, and cybersecurity, with content tailored to different employee roles. The results of these training sessions directly impact both performance evaluations and the employee bonus system, reinforcing their importance in risk management and operational excellence.

Through these structured monitoring mechanisms, the Bank ensures that its workforce policies remain effective, aligning with sustainability-related commitments and tracking progress over time using clear, measurable benchmarks. This initiative-taking approach allows the Bank to mitigate workforce-related risks, enhance employee engagement, and continuously adapt its policies and processes to the evolving workforce landscape. (ESRS 2.81b)

3.1.3.2. Characteristics of Libra Internet Bank's employees

In compliance with the requirements of ESRS requirements, the following information is disclosed regarding the composition and characteristics of the Libra Internet Bank's workforce.

Total Number of Employees and Breakdown by Gender and Country

The total number of employees at the Bank is 1,386, with 469 male employees and 917 female employees. There were no employees who identified as Other or Not Reported in the reporting period. (S1-6.50a)

Table: Employees Broken Down by Gender*

Gender	Number of Employees (2025)	Number of Employees (2024)
Male	469	431
Female	917	876
Not Reported	N/A	N/A
Total Employees	1,386	1,307

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

Total Number of Permanent, Temporary, and Non-Guaranteed Hours Employees (S1-6.50b)

The following tables detail the total number of employees based on employment type and gender, in December 2025 and December 2024, respectively.

Table: Employees Broken Down by Gender and Type of Employment* (December 2025)

Category	Female	Male	Not Disclosed	Total
Number of Employees (Head Count)	917	469	N/A	1,386
Number of Permanent Employees (Head Count)	862	456	N/A	1,318
Number of Temporary Employees (Head Count)	55	13	N/A	68
Number of Non-Guaranteed Hours Employees (Head Count)	N/A	N/A	N/A	N/A
Number of Full-Time Employees (Head Count)	907	462	N/A	1,369
Number of Part-Time Employees (Head Count)	10	7	N/A	17

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

Table: Employees Broken Down by Gender and Type of Employment* (December 2024)

Category	Female	Male	Not Disclosed	Total
Number of Employees (Head Count)	876	431	N/A	1,307
Number of Permanent Employees (Head Count)	829	416	N/A	1,245
Number of Temporary Employees (Head Count)	47	15	N/A	62
Number of Non-Guaranteed Hours Employees (Head Count)	N/A	N/A	N/A	N/A
Number of Full-Time Employees (Head Count)	870	426	N/A	1,296
Number of Part-Time Employees (Head Count)	6	6	N/A	11

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

Total Employee Turnover and Number of Employees Who Left the Organization (S1-6.50c)

During the reporting period, 244 employees left the organization, resulting in an employee turnover rate of 13.55% (S1-6.50c).

All employee numbers were reported as a headcount at the end of the reporting period.

No significant fluctuations in employee numbers that require additional contextual information were recorded. (S1-6.50e)

The total number of employees by gender and country reported above is identical to the annual financial statements, as reflected on page 65 of the financial report. (S1-6.50f)

Methodology for Employee Turnover Calculation (ESRS 2 MDR-M.77)

The turnover rate is calculated using the following formula:

$$\text{TURNOVER RATE} = \left(\frac{\text{Number of employees who left during the reference period}}{\text{Average number of active employees during the reference period}} \right) * 100$$

Where:

$$\text{Average number of employees in the reference period} = \frac{\text{Number of employees at the start of the reference period} + \text{Number of employees at the end of the reference period}}{2}$$

This formula accounts for the percentage of employees who have left the organization while factoring in the average number of active employees over the reporting period. Employees who left the Bank within their trial period are excluded from the calculation. (ESRS 2 MDR-M.77a)

The measurement of this metric has not been validated by an external body other than the assurance provider. (ESRS 2 MDR-M.77b)

No additional labeling or alternative definitions are applied to this metric. (ESRS 2 MDR-M.77c)

Non-Employees in the Undertaking's Own Workforce

The Bank employs non-employees in its own workforce, which includes self-employed workers and individuals provided by employment agencies. The total number of non-employees engaged in the Bank's operations is presented in the table below. (S1-7.55a)

Table 55: Non-Employee Workforce Data

Category	2025	2024
Total number of non-employee workers in own workforce	10	11
Total number of self-employed workers	5	6
Total number of workers provided by undertakings primarily engaged in employment activities	5	5

These numbers exclude individuals who are part of the Bank's direct employee workforce but contribute to its operations under contractual agreements.

The Bank reports its non-employee workforce data as a headcount at the end of the reporting period (31.12.2025). This approach ensures consistency in workforce reporting and aligns with internal workforce tracking systems. The data does not include full-time equivalent (FTE) conversions, as non-employees operate under varied contract structures that do not always reflect standard working hours. (S1-7.55b)

There were no significant fluctuations in the number of non-employees in the workforce between the current and previous reporting periods. Thus, no additional contextual data is necessary for understanding workforce trends. (S1-7.55c)

All reported numbers are based on actual data, with no estimations used in compiling the non-employee workforce figures. (S1-7.57)

The Bank calculates the non-employee workforce based on the total headcount at the end of the reporting period (31.12.2025). This approach ensures accuracy and alignment with internal HR records. (ESRS 2 MDR-M.77a)

The Bank's measurement of non-employee workforce data has not been validated by an external body, other than the assurance provider. (ESRS 2 MDR-M.77b)

The non-employee workforce metric has been labeled and defined using clear and precise descriptions, in accordance with HR reporting standards. However, no alternative labels or definitions have been assigned to this metric. (ESRS 2 MDR-M.77c)

Diversity Metrics (S1-9.66a)

Below is the breakdown of gender distribution within the Bank's top management positions. This data ensures transparency in leadership representation and supports diversity monitoring.

Table 57: Top Management Level Employee Data, December 2025* (S1-9.66a)

Gender	Number of Employees	% of Top Management Level	under 30 years old	30-50 years old	over 50 years old
Female	2	25%	0	0	2
Male	6	75%	0	1	5
No Data	N/A	-	-	-	-
Total	8	100%	0	1	7

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

Table 57: Top Management Level Employee Data, December 2024* (S1-9.66a)

Gender	Number of Employees	% of Top Management Level	under 30 years old	30-50 years old	over 50 years old
Female	2	25%	0	0	2
Male	6	75%	0	0	6
No Data	N/A	-	-	-	-
Total	8	100%	0	0	8

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

For reporting purposes, top management is defined as Board Members, including Management Function Members and Supervisory Function Members. This definition ensures consistency in leadership reporting (S1-9.AR 71).

The Bank discloses employee distribution by age category, showcasing its workforce composition across different career stages (S1-9.66b).

Table 58: Employee Data by Age Groups

Age Group	2025		2024	
	Number of Employees	% of Total Employees	Number of Employees	% of Total Employees
Under 30 years old	434	31.31%	468	35.8%
Between 30 and 50 years old	902	65.08%	795	60.81%
Over 50 years old	50	3.61%	44	3.37%

This age distribution data provides insights into workforce demographics, talent pipeline sustainability, and potential succession planning needs.

Adequate Wages

The Bank ensures that all its employees receive wages that comply with local legal minimum wage regulations. Salaries are structured to align with national wage laws, reinforcing the institution's commitment to fair compensation practices (S1-10.69).

The Bank confirms that no employees earn below the applicable wage benchmark (Legal minimum wage) in Romania, the only country where it operates. This ensures that all employees receive fair remuneration, maintaining compliance with wage adequacy standards (S1-10.70).

Social Protection

The Bank ensures that all employees are covered by social protection in accordance with labor legislation:

- ⇒ Labor Code (Law no. 53/2003)
- ⇒ Decision no. 1500/2024 regarding the collective labor agreement in the banking sector
- ⇒ Regulations on occupational health and safety (e.g., Government Decision no. 1425/2006 and no. 955/2010)
- ⇒ Law no. 346/2002 on insurance for work-related accidents and occupational diseases
- ⇒ Regulation (EU) 2016/679 (GDPR)

Employees are protected against loss of income due to sickness, unemployment, employment injury, acquired disability, parental leave, and retirement through public programs or benefits provided by the bank (S1-11-74).

All employees are covered under social protection programs in accordance with national regulations and internal policies (S1-11-75).

Persons with Disabilities

The percentage of employees with disabilities within the bank's workforce is 0.30%, in compliance with legal restrictions on data collection (S1-12.79).

Training and Skills Development Metrics (S1-13.83a, S1-13.83b)

The following table provides an overview of employee participation in career development and performance reviews, as well as the average number of training hours per employee, broken down by gender.

Table 59: Career Development, Performance Reviews, and Training Hours

	2025*				2024*			
	Female	Male	Not disclosed	Total	Female	Male	Not disclosed	Total
Percentage of employees and (or) non-employees that participated in regular performance and career development reviews	668 (63.75%)	380 (36.25%)		1048 (100%)	565 (64.79%)	307 (35.20%)	-	872 (100%)
Average number of training hours per employee and (or) non-employee	8	8	-	-	8	8	-	-

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

Methodologies and Assumptions (ESRS 2 MDR-M.77)

For defining the gender percentages of employees involved in the 2025 evaluation process, the following considerations were applied:

1. The number of candidates included in the evaluation process (668 + 380) consists of employees with an active contract at the time of evaluation, who have worked for at least four months in the previous year in the role they are being evaluated for (i.e., they must have been in the role since at least September 1st of the previous year).
2. All completed evaluations were considered, ensuring that, at the time of finalizing the report, the contracts of those included in the final assessment remained active.

For calculating the average number of training hours per employee, the following aspects were considered:

1. According to internal regulations, each employee's Key Performance Indicator (KPI) includes a professional development objective requiring a minimum of 8 hours of training per year to be fully achieved (100%).
2. The bank provides multiple opportunities for all employees to meet their professional development KPI through:
 - ⇒ In-person training sessions
 - ⇒ Online training courses
 - ⇒ The bank's Learning Management System (LMS)
3. All training activities are included in the annual training plan, with the measurement indicator represented by "man-hours."

Last year, the bank recorded more than 23,000 man-hours of training activities. Additionally, employees are included in the annual training and testing program covering critical topics relevant to operations, using the LMS platform. For each course, a designated study period is estimated according to internal procedures. Thus, mandatory courses complement the training plan, ensuring an average of 8 hours of training per year.

Validation by an External Body (ESRS 2 MDR-M.77b)

There has been no validation of these metrics by an external body other than the assurance provider.

Metric Labeling and Definition (ESRS 2 MDR-M.77c)

Man-hours are calculated using the following formula:

Man-hours = Number of participants × Number of sessions × Session length

To track man-hours, all training activities are recorded weekly based on attendance lists.

3.1.3.3. DR S1-14 – Health and Safety Metrics

	Employees		Non-employees	
	2025	2024	2025	2024
Percentage of own workers who are covered by health and safety management system based on legal requirements and (or) recognized standards or guidelines	100%	100%		100%
Number of fatalities in own workforce as result of work-related injuries and work-related health problems	0	0	0	0
Number of fatalities in own workforce as result of work-related injuries	0	0	0	0
Number of fatalities in own workforce as result of work-related health problems	0	0	0	0
Number of fatalities as result of work-related injuries and work-related health problems of other workers working on undertaking's sites	0	0	0	0
Number of fatalities as result of work-related injuries of other workers working on undertaking's sites	0	0	0	0
Number of fatalities as result of work-related health problems of other workers working on undertaking's sites	0	0	0	0
Number of recordable work-related accidents for own workforce	1	0	0	0
Rate of recordable work-related accidents for own workforce				
Number of cases of recordable occupational health problems of own workforce	0	0	0	0
Number of days lost due to work-related injuries and fatalities from work-related accidents, occupational health problems, and deaths caused by health problems	12 days	0	0	0

In 2024, one work event was declared and registered. Following the investigation of the event, the investigation commission established that the event was an accident outside of work. The Territorial Labor Inspectorate approved the investigation file. (S1-14.90)

In 2025, a work-related event was declared and recorded. Following the investigation of the event, the investigation committee determined that the event qualified as a commuting work accident resulting in temporary incapacity for work. The Territorial Labor Inspectorate approved the investigation file. All work events are reported to the division responsible, and those responsible must take all legal measures to report the event internally and to the Territorial Labor Inspectorate. For those who are not employed under an individual employment contract, the legislation applies differently. However, they are trained, participate in fire evacuation drills, and must comply with company rules. (ESRS 2 MDR-M.77a, b)

3.1.3.4. DR S1-15 – Work-life balance metrics

At Libra Internet Bank, 100% of employees are entitled to take family-related leave. In 2025, 7,65% of entitled female employees and 4,25% of entitled male employees took family-related leave, totaling 12% of all employees. There is no data available for other gender categories (S1-15.93 a, b).

Percentage of entitled employees that took family-related leaves*	2025	2024
Female	7.65%	7%
Male	4.25%	5%
No data	-	-
	11.9%	12%

(*) In Romania, the official records on the basis of which this information is reported currently operate only with the categories male and female (in accordance with Government Decision No. 64/2011); therefore, the 'other/alternative gender' category is not applicable.

All employees of Libra Internet Bank have access to family leave according to internal policies and/or labor law. Since all employees are entitled to family-related leave through social policy and/or collective bargaining agreements, this disclosure meets the requirement of paragraph 93a (S1-15.94).

Employees can access these days off whenever a family event occurs, in accordance with labor law. The methodology and significant assumptions behind this metric include the application of national labor laws and internal policies, which grant employees leave for special events such as marriage, family emergencies, paternity leave, and funerals. There are no external bodies validating this metric beyond the assurance provider (ESRS 2 MDR-M.77a, b). The metric is labeled and defined clearly as special event leave days, covering marriage, family emergencies, parental leave, and funeral leave (ESRS 2 MDR-M.77c).

3.1.3.5. DR S1-16 – Remuneration metrics (pay gap and total remuneration)

Libra Internet Bank discloses the gender pay gap as required, calculated using all employees' gross hourly pay level. The gender pay gap for 2025 in Romania across all employees at Libra Internet Bank is 26,53% (S1-16.97a).

Gender pay gap				
Country	Operating segment	Employee category	2025	2024
Romania	Libra Internet Bank	All Employees	26.53%	30.00%

The Bank also discloses the annual total remuneration ratio of the highest-paid individual to the median for all other employees, which is 8.16 (S1-16.97b). This calculation includes all employees and considers base salary, cash benefits, benefits in kind, and direct remuneration, as per the undertaking's remuneration policies. (S1-16.AR 101 & ESRS 2 MDR-M.77).

The methodology used aligns with regulatory requirements and includes all employees' gross hourly pay, calculated based on the prescribed formula (S1-16.AR 98).

The measurement of this metric is not validated by an external body other than the assurance provider (ESRS 2 MDR-M.77a, b). There are no additional labels or definitions required for this metric (ESRS 2 MDR-M.77c).

3.2. Consumers and End-users

Introduction

At Libra Internet Bank, the relationship with consumers and end-users is guided by a commitment to transparency, ethical conduct, data protection, and accessibility. The Bank integrates these principles into its strategic, operational, and digital processes to ensure that the delivery of financial products and services is both responsible and inclusive. In a rapidly evolving financial and regulatory environment, Libra Internet Bank maintains a proactive stance in understanding and addressing the material impacts, risks, and opportunities (IROs) related to consumers, as identified through the Double Materiality Assessment.

Libra Internet Bank's approach to consumer and end-user responsibility is rooted in a comprehensive policy framework that governs privacy, marketing, communication, and cybersecurity. These policies are designed not only to comply with national and EU regulations – such as the General Data Protection Regulation (GDPR) – but also to reflect the Bank's values of fairness, integrity, and customer-centric innovation.

Key positive impacts identified include the protection of privacy through secure digital infrastructure, the promotion of freedom of expression in digital environments, access to clear and accurate financial information, and responsible marketing practices that enhance customer trust. These areas are actively managed through specific strategies and internal controls, including the Cyber Security and Resilience Strategy 2024–2026, the Personal Data Processing Procedure, and the Marketing Framework, which together establish the principles, mechanisms, and accountability lines necessary for effective stakeholder protection.

Libra Internet Bank ensures that consumer-facing policies apply uniformly across its value chain and customer base while acknowledging that certain groups – such as minors or individuals with limited financial literacy – may require additional safeguards. The Bank's operational model includes digital education, communication transparency, and consent-driven marketing, which collectively help mitigate risks and enhance financial inclusion.

While no material negative impacts were identified during the Double Materiality Assessment, the Bank remains vigilant, implementing early detection and continuous improvement measures to prevent potential future issues. Dedicated governance structures, including the Data Protection Officer and Heads of Risk and Marketing Divisions, oversee implementation and effectiveness monitoring, supported by regular staff training and customer feedback mechanisms such as Net Promoter Score (NPS) surveys and customer engagement forums.

This chapter provides a detailed overview of how Libra Internet Bank manages its material impacts, risks, and opportunities related to consumers and end-users. It outlines the relevant disclosure requirements under ESRS S4, describes the policies in place, and highlights the actions and resources dedicated to achieving meaningful outcomes for customers across the Bank's operational footprint.

3.2.1. Strategy

Libra Internet Bank demonstrates a clear and integrated connection between its digital, cyber, and personal data protection strategies and its broader business model, reflecting a strong alignment with ESRS expectations. The Bank's IT Strategy underscores its commitment to data protection, aiming to foster trust in digital services, reduce misuse, and enhance transparency and accountability. This directly relates to the potential and actual impacts on consumers and end-users, particularly concerning digital trust and cybersecurity.

To proactively mitigate digital and operational risks, Libra Internet Bank has adopted advanced mechanisms based on Machine Learning and Artificial Intelligence to enhance its capability to detect and respond to internal and external threats. This aligns with the strategy's core objective to reduce the time between the identification of a vulnerability and the implementation of risk mitigation controls – a key adaptation of the business model in response to digital risks.

Moreover, the Cyber Security and Resilience Strategy 2024–2026 expands the scope and depth of cyber initiatives. This includes:

- ⇒ Systematic penetration testing and remediation plans
- ⇒ Optimization of internet and mobile banking security systems
- ⇒ Company-wide awareness and cybersecurity training programs
- ⇒ Regulatory alignment for personal data protection through internal frameworks that govern how consent is collected, managed, and retained

These actions not only connect back to the Bank's core operations but also influence and shape strategic choices, demonstrating a strong feedback loop between risk/impact assessments and strategic adaptation – satisfying both parts of this disclosure requirement.

Further, responsible marketing practices reflect consumer-centric values, ensuring that communication is based on explicit consent, and avoiding deceptive advertising, which aligns with transparency and ethical standards expected by ESRS. Such practices mitigate reputational and regulatory risks and form part of the broader consumer trust strategy. (*Disclosure Reference: S4-SBM-3.9a*)

The customer relationship is managed in a way that prioritizes value-added services, trust, and long-term satisfaction, all of which represent opportunities for growth while mitigating churn-related risks. By addressing both risk (e.g., data breaches, loss of trust) and opportunity (e.g., service personalization, digital efficiency), the bank shows that its strategy and business model evolve in response to identified dependencies on and impacts from consumers and end-users. (*Disclosure Reference: S4-SBM-3.9b*)

The Bank provides a clear segmentation of its consumer and end-user base:

- ⇒ General Consumers and End-Users: Individuals, micro-companies, SMEs, and large enterprises across sectors.

Digital Channel Consumers: Users of digital banking services end-to-end operations where the Remote Identification Norm's provisions are applied. Libra Internet Bank designs and delivers financial services for a broad range of consumers and end-users. These include individual retail clients, micro-enterprises, small and medium-sized enterprises (SMEs), and large companies across a variety of economic sectors. The Bank recognizes that while all customers are important stakeholders, certain categories of users may be more exposed to material impacts arising from the Bank's operations and digital services.

In particular, consumers and end-users who rely on digital banking services are identified as having privacy-sensitive needs. These consumers are particularly concerned with how their data is handled and protected. Accordingly, the Bank prioritizes responsible data processing, non-discrimination, and the safeguarding of freedom of expression as key ethical and operational pillars within its digital service offerings. *(Disclosure: S4-SBM-3.10a)*

The consumers and end-users that are at heightened risk of material impact are:

i. Consumers of inherently harmful products

This category does not apply to Libra Internet Bank's financial services, which do not include products that are inherently harmful or contribute to chronic disease. *(Disclosure: S4-SBM-3. 10a.i)*

ii. Consumers whose rights to privacy and non-discrimination may be impacted

Libra Internet Bank acknowledges that the protection of consumer rights – especially privacy, freedom of expression, and equal treatment – is critical to maintaining trust. In response, the Bank has implemented advanced data protection frameworks and cybersecurity mechanisms aligned with GDPR requirements. Personal data is protected throughout all stages of the service lifecycle, from onboarding to relationship management. These protocols include secure storage, restricted access, encryption, and routine security audits. This commitment minimizes the risk of privacy violations or discriminatory practices. *(Disclosure: S4-SBM-3. 10a.ii)*

iii. Consumers dependent on accurate and accessible product-related information

Informed decision-making is essential in the financial sector. Libra Internet Bank ensures that all financial products are accompanied by clear, accurate, and transparent information, including terms and conditions, fee structures, and associated risks. The Bank provides both digital (www.librabank.ro) and printed materials and offers face-to-face and online advisory support. These measures are continuously reviewed to align with regulatory expectations and best practices, reducing the risk of consumer misunderstanding or misuse of financial services. *(Disclosure: S4-SBM-3.10a.iii)*

iv. Particularly vulnerable consumers (e.g., children, financially vulnerable individuals)

The Bank acknowledges that certain user groups, such as minors and individuals with limited financial literacy, may require enhanced protection. Services for minors are strictly regulated (<https://www.librabank.ro/card-junior-copii>), allowing only legal guardians to open and manage related accounts. The Bank ensures that products targeted toward vulnerable populations are clearly explained and supported through customer education and ethical marketing. *(Disclosure: S4-SBM-3. 10a.iv)*

Based on the findings of the Double Materiality Assessment (DMA), no widespread, systemic, or individual negative impacts on consumers or end-users have been identified to date. The Bank's standard framework for risks monitoring mechanisms remains in place to ensure that any emerging risks are promptly identified and addressed. *(Disclosure: S4-SBM-3.10b)*

In terms of positive impacts on consumers and end-users, the Bank's services – particularly those under the IBK (Internet Banking for companies), MBK (Mobile Banking), and broader digital product suites – have demonstrably increased financial accessibility for consumers. These services enable easier participation in national and European financing programs, supported by user-friendly digital tools and educational content. As a result, consumers are empowered to meet their financial goals with greater efficiency and confidence. *(Disclosure: S4-SBM-3.10c)*

The Bank focuses on cultivating a well-informed and protected customer base, which directly contributes to building a trusted market reputation and improving financial performance. At the same time, the Bank remains vigilant regarding risks such as potential data breaches, miscommunication of product terms, or marketing missteps. These risks are actively mitigated through robust governance, employee training, and consumer engagement initiatives. *(Reporting: S4-SBM-3.10d)*

Following its materiality assessment process, Libra Internet Bank has developed a detailed understanding of how specific consumer segments – especially users of digital services – may face heightened exposure to negative impacts, such as data breaches or financial fraud. This insight informs the Bank's risk management approach, which includes enhanced IT controls, targeted communication strategies, and consumer support channels to proactively address emerging risks. *(Disclosure: S4-SBM-3.11)*

While the Bank's offerings are broadly targeted, it acknowledges that certain population groups – including young consumers and those with limited financial education – may require specific consideration. By engaging student/young graduates in financial and digital literacy programs, along with protective IT frameworks, the Bank ensures that these groups are not disproportionately affected. At the same time, the Bank emphasizes that potential risks and opportunities are managed consistently across its consumer base. *(Disclosure: S4-SBM-3.12)*

3.2.2. Management of Impacts, Risks and Opportunities

Introduction

At Libra Internet Bank, the relationship with consumers and end-users is guided by a commitment to transparency, ethical conduct, data protection, and accessibility. The Bank integrates these principles into its strategic, operational, and digital processes to ensure that the delivery of financial products and services is both responsible and inclusive. In a rapidly evolving financial and regulatory environment, Libra Internet Bank maintains a proactive stance in understanding and addressing the material impacts, risks, and opportunities (IROs) related to consumers, as identified through the Double Materiality Assessment.

Libra Internet Bank's approach to consumer and end-user responsibility is rooted in a comprehensive policy framework that governs privacy, marketing, communication, and cybersecurity. These policies are designed not only to comply with national and EU regulations – such as the General Data Protection Regulation (GDPR) – but also to reflect the Bank's values of fairness, integrity, and customer-centric innovation.

Key positive impacts identified include the protection of privacy through secure digital infrastructure, the promotion of freedom of expression in digital environments, access to clear and accurate financial information, and responsible marketing practices that enhance customer trust. These areas are actively managed through specific strategies and internal controls, including the Cyber Security and Resilience Strategy 2024–2026, the Personal Data Protection Procedure, and the Marketing Framework, which together establish the principles, mechanisms, and accountability lines necessary for effective stakeholder protection.

Libra Internet Bank ensures that consumer-facing activities are applied uniformly across its customer base while acknowledging that certain groups – such as minors or individuals with limited financial literacy – may require additional safeguards. The Bank’s operational model includes digital education, communication transparency, and consent-driven marketing, which collectively help mitigate risks and enhance financial inclusion.

Although no significant adverse impacts were identified during the Double Materiality Assessment, the Bank remains vigilant, implementing early detection measures and continuous improvement initiatives to prevent potential future issues. Dedicated governance structures, including the Data Protection Officer and the Heads of the Risk and Marketing Divisions, oversee the implementation and monitoring of effectiveness, supported by regular staff training and customer feedback mechanisms such as Net Promoter Score (NPS) surveys and customer engagement forums (Libra Friends and Trends, student presentations, the Bank’s branches, and the dedicated email addresses available on the Bank’s website: reclamatii@librabank.ro, info@librabank.ro).

This chapter provides a detailed overview of how Libra Internet Bank manages its material impacts, risks, and opportunities related to consumers and end-users. It outlines the relevant disclosure requirements under ESRS S4, describes the policies in place, and highlights the actions and resources dedicated to achieving meaningful outcomes for customers across the Bank’s operational footprint. (*Disclosure: S4-1.13*)

3.2.2.1. Policies related to consumers and end-users

Cyber Security and Resilience Strategy (2024-2026)

Libra Internet Bank’s Cyber Security and Resilience Strategy 2024–2026 was developed in direct response to the growing relevance of digital privacy, data protection, and operational continuity in the financial sector. The policy reflects the Bank’s commitment to strengthening its information technology and cybersecurity infrastructure, with the overarching goal of safeguarding consumer and end-user privacy and ensuring uninterrupted service delivery.

The strategy includes:

- ⇒ Continuous evaluation of IT&C risks through internal risk assessments and vulnerability testing.
- ⇒ Implementation of machine learning (ML) and AI-based detection systems to mitigate cyber intrusion attempts.
- ⇒ Expansion of incident response and recovery frameworks to ensure business continuity in the face of system breaches.
- ⇒ Conducting external penetration testing followed by remediation.

Providing annual training and awareness programs to all employees to foster a culture of cyber hygiene and privacy consciousness.

This policy directly addresses the protection of privacy and access to quality information, as identified in the Bank’s Double Materiality Assessment. It enhances secure digital infrastructure and ensures accurate, timely communication of system-related updates, thereby reinforcing consumer trust in digital services. (*Disclosure: MDR-P 65(a), S4-1.13*)

The strategy applies to:

- ⇒ All internal operations involving digital systems, data infrastructure, and online services.
- ⇒ All geographical locations in which the Bank operates.
- ⇒ All consumer-facing platforms, including Internet Banking and Mobile Banking applications.
- ⇒ All employees, technical administrators, and collaborators involved in system operations, security, or compliance.

While the policy currently focuses on internal infrastructure, its impacts extend downstream by protecting customer data and upstream by ensuring that third-party systems integrated into the Bank's operations meet equivalent security standards. *(Disclosure: MDR-P 65(b))*

The Security Department, which is directly subordinated to the Risk Management Division, holds ultimate responsibility for the implementation and continuous review of this policy. This includes incident monitoring, reporting to executive management, and coordinating inter-departmental responses to cyber threats. *(Disclosure: MDR-P 65(c))*

The strategy is aligned with leading cybersecurity and operational resilience frameworks, including:

- ⇒ ISO 27001:2022 (Information Security Management Systems)
- ⇒ EU Digital Operational Resilience Act (DORA)
- ⇒ National best practices for financial institutions concerning IT risk management

By following these standards, Libra Internet Bank ensures it meets both international and European regulatory expectations regarding IT security, resilience, and consumer protection. *(Disclosure: MDR-P 65(d))*

The strategy was developed with direct consideration of key stakeholder interests, including:

- ⇒ Consumers, whose data privacy must be protected.
- ⇒ Employees, who rely on system security for day-to-day activities.
- ⇒ Business partners, who interact with the Bank's systems and platforms.
- ⇒ Regulatory authorities, to whom the Bank must demonstrate compliance.

By integrating feedback from these groups (especially through incident reporting and annual system audits), the strategy ensures relevance and operational responsiveness. *(Disclosure: MDR-P 65(e))*

As of now, the Cyber Security and Resilience Strategy 2024–2026 is an internal document and is not publicly available. However, key privacy-related commitments and controls are communicated to consumers via the Bank's digital platforms, and high-level summaries are shared in annual disclosures and client communications. *(Disclosure: MDR-P 65(f))*

This policy applies uniformly to all consumers and end-users without discrimination, ensuring that everyone benefits equally from the protections and procedures established under the cybersecurity framework. *(Disclosure: S4-1.15)*

Procedure on the processing of personal data

The Procedure on the processing of personal data sets out the legal, organizational, and operational framework for the processing of personal data in compliance with Regulation (EU) 2016/679 (GDPR) and national Romanian Law 190/2018. It applies to all personal data processing activities carried out by Libra Internet Bank staff, collaborators, authorized processors, and third parties.

Key components include:

- ⇒ Defining data processing principles, legal bases (e.g., consent, contractual necessity), and data subject rights.
- ⇒ Regulating internal workflows for managing consent withdrawal, access requests, rectification, and erasure.
- ⇒ Training staff and data users on obligations.
- ⇒ Ensuring clear escalation in the event of a data breach (via the DPO and Incident Response Team).
- ⇒ Limiting the scope of personal data usage to what is strictly necessary and maintaining an internal Record of Processing Activities.

This regulation directly supports the Bank's material commitments to privacy, access to information, and responsible marketing practices, as identified in the Double Materiality Assessment. It serves as the operational cornerstone of lawful, transparent, and secure personal data processing across all customer-facing and internal processes. *(Disclosure: MDR-P 65(a), S4-1.13)*

This policy applies to:

- ⇒ All employees and collaborators handling personal data.
- ⇒ All internal systems and processes (onboarding, account management, marketing, complaints, etc.).
- ⇒ Third-party processors and authorized entities operating under Libra Internet Bank's control.
- ⇒ All consumers and end-users, including clients, former clients, and interested parties.

It does not extend to personal use of employee data outside authorized job functions. However, the entire value chain of customer data processing is addressed, including internal collection and external sharing (if any), ensuring GDPR alignment. *(Disclosure: MDR-P 65(b), S4-1.15)*

The Data Protection Officer (DPO), part of the Compliance Division, is directly accountable for implementing and monitoring this policy. The DPO reports to the General Director and has independent authority to advise on legal, compliance, and security actions regarding data privacy. *(Disclosure: MDR-P 65(c))*

The policy is fully aligned with:

- ⇒ Regulation (EU) 2016/679 – GDPR
- ⇒ Romanian Law no. 190/2018
- ⇒ Guidelines from ANSPDCP (National Supervisory Authority for Personal Data)
- ⇒ European Data Protection Board (EDPB) Standards *(Disclosure: MDR-P 65(e))*

While the internal procedure is not publicly available, a Privacy Policy is published online on the Bank's official website in accordance with GDPR Article 13 requirements. *(Disclosure: MDR-P 65(f))*

Applies to all consumers and end-users, without segmentation, with clear mechanisms to handle vulnerable data subjects (e.g., minors, elderly, digitally inexperienced users). *(Disclosure: S4-1.15)*

Marketing Framework (includes social media Policy, Promotional Campaigns Procedure, Website Administration Procedure, and Client Relationship Management Procedure)

Libra Internet Bank's Marketing Framework consists of structured internal rules designed to ensure transparency, fairness, and compliance in all consumer-facing communication and promotional activities.

It governs:

- ⇒ Consent-based marketing (e.g., only targeting clients who have opted in)
- ⇒ Ethical advertising with full disclosure of product risks and terms
- ⇒ Content governance for digital channels and public communications
- ⇒ Social media interaction guidelines and online content update protocols

These overarching principles are operationalized through four core internal procedures:

- ⇒ The Policy on Social Media Communication defines standards for engaging with audiences across digital platforms (e.g., Facebook, Instagram, LinkedIn), ensuring that all content is ethical, professional, brand-aligned, and compliant with legal and reputational risk standards.
- ⇒ The Website Administration Procedure governs how content on the Bank's official websites is created, reviewed, updated, and secured. It ensures that all public-facing online material is accurate, user-friendly, secure, and aligned with digital accessibility and compliance best practices.
- ⇒ The Working Procedure for Promotional Campaigns outlines how marketing campaigns are planned, validated, and executed. It includes processes for message review, approval protocols, legal compliance, and consistency across media channels (digital, print, TV, radio, etc.).
- ⇒ The Procedure for Managing Relationships with Clients and Non-Clients establishes structured methods for transmitting communications to groups of clients and non-clients, automated notifications, and the consultation of stakeholders.

The Framework is essential for safeguarding against consumer misinformation and promoting financial literacy, aligning with the Bank's material commitments to privacy, freedom of expression, access to quality information, and responsible marketing practices. Furthermore, Libra Internet Bank has implemented a series of actions to uphold responsible marketing practices and ensure transparent communication with all customers and end-users, in alignment with material impact area S4-Responsible Marketing Practices. These actions contribute to the protection of consumers from misleading promotions, uphold ethical standards in financial communications, and promote informed decision-making. (*Disclosure: MDR-P 65(a), S4-1.13*)

This framework applies across:

- ⇒ Digital channels (social media, website, email, app interfaces)
- ⇒ Print and media advertisements
- ⇒ Internal and external stakeholders, including marketing agencies
- ⇒ All consumer segments and product lines

Exclusions include non-business personal social media use by employees, which remains regulated only when brand affiliated. (*Disclosure: MDR-P 65(b), S4-1.15*)

The Head of the Marketing Division, reporting directly to the General Director, is responsible for implementing the framework and reviewing campaign compliance and effectiveness. (*Disclosure: MDR-P 65(c)*)

This policy is aligned with:

- ⇒ GDPR
- ⇒ ANPC (Romanian Consumer Protection Authority) guidelines
- ⇒ EU consumer transparency directives (*Disclosure: MDR-P 65(d)*)

The policy ensures protection of consumer interests through:

- ⇒ Clear content and accessibility standards
- ⇒ Campaign approval processes involving relevant internal departments
- ⇒ Feedback and correction mechanisms in case of advertising complaints (*Disclosure: MDR-P 65(e)*)

The Policy on Social Media Communication, the Website Administration Procedure, the Working Procedure for Promotional Campaigns, and the Procedure for Managing Relationships with Clients and Non-Clients are internal operational documents and are not publicly disclosed. These policies are intended for internal governance and apply to employees, collaborators, and relevant stakeholders involved in customer communication and marketing activities. While the policies themselves are not published, their principles are embedded in customer-facing platforms, marketing materials, and onboarding documents. *(Disclosure: MDR-P 65(f))*

Applies uniformly across all consumer and end-user segments, including those more vulnerable to marketing manipulation (e.g., minors, financially inexperienced). *(Disclosure: S4-1.15)*

Human Rights Policy Commitment

Although Libra Internet Bank has not adopted a formal standalone human rights policy commitment, it fully respects and integrates human rights principles into its internal procedures and operational practices. The Bank ensures compliance with all applicable legal requirements concerning the rights of consumers and/or end-users, particularly in relation to data privacy, freedom of expression, and non-discrimination.

The Bank's policies and procedures comply with national and European legal requirements, and these are incorporated through the design of operational protocols and oversight mechanisms that govern product development, marketing, digital communication, and client interactions. *(Disclosure: S4-1.16)*

Libra Internet Bank's internal procedural framework is explicitly designed to safeguard the privacy rights and freedom of expression of consumers and end-users. All financial products and services are subject to a multi-departmental validation process, involving the Compliance Division, IT Security, Legal, and other relevant functions, to ensure full compliance with national and European legislation – including the General Data Protection Regulation (GDPR).

By embedding legal compliance into the design and distribution of its products, the Bank ensures that consumer-facing activities respect the dignity, autonomy, and informational self-determination of all customers. *(Disclosure: S4-1.16a)*

Libra Internet Bank maintains open and accessible engagement channels to ensure that consumers and end-users can actively participate in shaping their banking experience and voice their concerns or preferences. These include:

- ⇒ IBK/MBK mobile and internet platforms
- ⇒ The Bank's official website (www.librabank.ro)
- ⇒ Social media channels
- ⇒ A dedicated email address for data-related concerns (protectiadatelor@librabank.ro)
- ⇒ Physical branches and a multilingual call center, including emergency support
- ⇒ Specialized communication channels for specific issues (e.g., garnishments, insolvencies)
- ⇒ An internal grievance mechanism for more serious or unresolved concerns

Notably, individuals have the right to withdraw consent for marketing communications at any time, using the digital channels mentioned above. Upon withdrawal, an automated process ensures that no further communication is sent, in line with GDPR and ethical marketing practices. *(Disclosure: S4-1.16b)*

Libra Internet Bank has established internal procedures for the prompt analysis and remediation of any potential or actual human rights impacts, whether identified through internal risk reviews, consumer complaints, or external audits. These procedures are governed by a multidisciplinary team including the Compliance Division, Legal, IT Security, and Risk Management.

When a concern is raised, it is formally assessed, documented, and followed by remedial measures, which may include:

- ⇒ Strengthening technical safeguards.
- ⇒ Updating internal protocols.
- ⇒ Offering direct redress or support to affected individuals.
- ⇒ Integrating the issue into staff training and continuous improvement programs.

To date, no material negative human rights impacts relating to consumers or end-users have been identified during the Double Materiality Assessment (DMA) exercise. (*Disclosure: S4-1.16c*)

As of the reporting period, the Bank has not identified any instances of non-respect for these instruments within its downstream value chain involving consumers or end-users. A structured risk-monitoring system is in place to detect, report, and mitigate any such issues should arise in the future. (*Disclosure: S4-1.17*)

3.2.2.2. Processes for engaging with consumers and end-users about general impacts

Libra Internet Bank ensures that the perspectives of consumers and end-users meaningfully inform decision-making processes aimed at identifying and addressing both actual and potential impacts. Feedback is actively collected through multiple ongoing engagement channels, including:

- ⇒ Customer satisfaction surveys
- ⇒ Direct client interactions at branches and through the call center
- ⇒ Digital feedback forms available through the Bank's website
- ⇒ Social media engagement and online reviews
- ⇒ Insights gathered through customer service interactions

A central tool in this engagement strategy is the Net Promoter Score (NPS), which the Bank uses regularly to measure the loyalty and satisfaction of its client base. By analyzing NPS trends and related feedback, the Bank identifies customer pain points, emerging expectations, and potential reputational risks.

This data is reviewed by relevant business units and informs concrete decisions on:

- ⇒ Enhancing product and service features.
- ⇒ Optimizing internal processes (e.g., complaint resolution, digital onboarding).
- ⇒ Designing customer communication strategies.
- ⇒ Adjusting marketing and consent management practices.

Additionally, new clients are explicitly encouraged to submit early-stage feedback through the website's dedicated contact form, which ensures that first impressions, onboarding experiences, and usability concerns are captured and integrated into service delivery adjustments.

By consistently prioritizing customer insights, Libra Internet Bank ensures its strategy is aligned with end-user needs, helping to mitigate potential negative impacts and enhance consumer trust, satisfaction, and long-term loyalty. (*Disclosure: S4-2.20*)

Libra Internet Bank directly engages with both affected consumers and/or end-users, as well as their legitimate representatives – such as legal guardians for minors or proxy contacts for corporate clients. These engagements are carried out through structured customer service interactions, branch communications, and digital platforms.

The Bank ensures that open communication channels are always available, including:

- ⇒ Email and written correspondence
- ⇒ Phone conversations and call center follow-ups
- ⇒ App-based chat or feedback tools
- ⇒ In-person discussions at branches

Where direct engagement is not feasible, the Bank also acknowledges insights received through credible proxies, such as regulatory bodies (e.g. ANPC), or B2B clients acting on behalf of their consumer networks. These insights are logged, assessed, and, when relevant, escalated through internal mechanisms to inform product and service adjustments.

This hybrid engagement model allows the Bank to ensure inclusive participation, particularly for users who are digitally excluded, legally represented, or in vulnerable positions. (*Disclosure: S4-2.20a*)

Engagement with customers is embedded throughout all phases of the customer lifecycle – from the moment a client opens an account, throughout the use of banking services, and up to the closing of their relationship with the Bank. Engagement types include:

- ⇒ Onboarding Phase: Feedback regarding customer experience at the initiation of the relationship with the Bank.
- ⇒ Active Relationship Phase: Ongoing feedback via customer service, NPS scoring, and in-app prompts.
- ⇒ Critical Events: Issue resolution (e.g. complaint handling), product renewals, service changes.
- ⇒ Offboarding/Exit Phase: Exit surveys or retention outreach to understand reasons for leaving.

The frequency of engagement is continuous, with structured moments of interaction and real-time response channels (e.g., call center, mobile app feedback). This ensures that consumer perspectives are continuously integrated into operational and strategic decision-making processes. (*Disclosure: S4-2.20b*)

At Libra Internet Bank, the Marketing Division Director holds the most senior operational responsibility for ensuring that customer engagement processes are carried out effectively and systematically across all channels. This role oversees the collection, analysis, and integration of consumer feedback into business decision-making processes and ensures that key insights inform product development, service delivery improvements, and communication strategies. (*Disclosure: S4-2.20c*)

Libra Internet Bank systematically evaluates the effectiveness of its consumer engagement practices through a variety of quantitative and qualitative metrics, including:

- ⇒ Net Promoter Score (NPS): used to assess client loyalty and likelihood to recommend the bank.
- ⇒ Customer Satisfaction (CSAT) surveys: deployed periodically or after key interactions.
- ⇒ Social media monitoring.
- ⇒ Call center analytics and complaint data trends.
- ⇒ Website and app feedback forms and data analytics.

The Bank conducts regular reviews of this data to identify improvement areas and address recurring concerns. Outcomes resulting from this engagement include:

- ⇒ Enhancements to customer onboarding experiences.
- ⇒ Adjustments to service terms or delivery based on pain points.
- ⇒ Updates to consumer communication strategies.
- ⇒ Tailored solutions for customer segments (e.g., young professionals, SMEs).

The process ensures a feedback loop where input from consumers directly leads to actionable improvements in products, services, or communication. (*Disclosure: S4-2.20d*)

Libra Internet Bank takes a proactive and inclusive approach to understand the perspectives of potentially vulnerable or marginalized consumers, including:

- Minors: Access to financial products is limited and mediated through legal guardians, ensuring safety and oversight.
- Persons with disabilities: Web accessibility standards are gradually being integrated into the Bank's digital infrastructure (e.g., mobile banking apps, website design), in line with EU Web Accessibility Directive principles.
- Financially vulnerable individuals: Product documentation is simplified, and support is offered through dedicated staff and digital tools.

Feedback channels (such as complaint portals (reclamatii@librabank.ro), call center, and branch interactions) are open to all consumer segments and adapted as needed to reduce communication barriers. (*Disclosure: S4-2.21*)

3.2.2.3. Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Libra Internet Bank has established a framework for addressing and remedying any material negative impacts on consumers and end-users, whether these impacts arise directly from its own operations or indirectly through its value chain.

When a potential or actual negative impact is identified – through internal monitoring systems, regulatory reporting, or customer complaints – the bank activates its incident review protocols. These involve:

- ⇒ Classification of the type and severity of the impact.
- ⇒ Assignment of case ownership to a designated department (e.g., Customer Support, Compliance, Risk Management).
- ⇒ Formal logging of the incident in the internal tracking system.
- ⇒ Development of a tailored corrective action plan.

If the source of the impact is related to a business partner or third-party service provider, the bank coordinates with these entities to:

- ⇒ Investigate the root cause.
- ⇒ Define joint remediation steps.
- ⇒ Monitor execution and enforce accountability clauses in service contracts (e.g., SLAs or compliance terms).

Each reported incident is logged, and follow-up actions are documented in the internal case management system. Furthermore, customer service and compliance teams track the status of the resolution and ensure communication is maintained with the consumer.

Internal audits and root cause analysis are periodically conducted to identify systemic issues and prevent recurrence. The effectiveness of remedies is evaluated based on:

- Resolution time
- Customer satisfaction feedback post-remedy
- Recurrence rates of similar complaints

The Bank's structured response system helps ensure consumer confidence, transparency, and compliance with legal and ethical obligations. (*Disclosure: S4-3.25a*)

Libra Internet Bank provides a comprehensive range of formal channels that allow consumers and end-users to raise concerns, lodge complaints, or request clarification regarding the bank's products, services, and communications. These channels are developed and operated by the Bank itself, with support for third-party redress where applicable.

1. Internal Complaint and Feedback Channels (Established by the Bank):

- ⇒ Call Center: Dedicated lines for general inquiries and emergency support (e.g., card blocking).
- ⇒ Internet and Mobile Banking Apps: Integrated ticketing tools for reporting technical or transactional issues.
- ⇒ In-branch Desks: Physical support desks available at all bank branches for personalized assistance.
- ⇒ Dedicated Email Contacts: Topic-specific email addresses for concerns such as garnishments, insolvencies, data privacy (e.g., protectiadatelor@librabank.ro), and general inquiries.

2. External/Third-party Mechanisms (Supported by the Bank):

- ⇒ The Bank informs customers of their right to escalate unresolved complaints to the National Authority for Consumer Protection (NACP) or the National Bank of Romania (NBR).
- ⇒ These regulatory channels provide independent review and redress, especially in cases of unresolved or systemic issues.

This system ensures accessibility and transparency in addressing concerns and maintaining a high standard of consumer care. (*Disclosure: S4-3.25b*)

In general, Libra Internet Bank does not mandate the implementation of dedicated complaint mechanisms by its business partners. However, in select cases – particularly when the partner is directly offering financial products or services to consumers (such as fintech collaborators or partner credit institutions) – the Bank may:

- ⇒ Coordinate complaint resolution mechanisms by integrating its grievance handling systems with those of the partner (the maximum complaint-resolution period is 30 days).
- ⇒ Establish communication protocols for the exchange of relevant consumer feedback data.
- ⇒ Monitor incident trends to ensure that the partner meets agreed-upon service and conduct standards.

These practices ensure that consumers using partner platforms or white-label services have equal access to the same protection standards and redress avenues. *(Disclosure: S4-3.25c)*

Regular internal reviews are conducted to assess both the responsiveness and quality of the resolution process. These reviews involve relevant business units such as Compliance, Customer Service, and Risk Management. Based on findings, procedures are updated, training is provided, and systems are optimized to strengthen effectiveness. Stakeholders, including employees managing frontline interactions and customers who file complaints, indirectly contribute through structured feedback loops and satisfaction surveys. *(Disclosure Requirement: S4-3.25d)*

Consumer trust in the grievance process is further assessed through resolution success rates and feedback forms post-resolution. Insights from these evaluations are used to refine messaging, update channel interfaces, and improve response protocols.

Libra Internet Bank has in place internal rules to protect customers and employees who use grievance mechanisms from retaliation. These safeguards include anonymity options in complaint submissions, escalation protocols, and oversight by the Compliance and Risk divisions. These measures align with ESRS G1-1 expectations regarding anti-retaliation. *(Disclosure Requirement: S4-3.26)*

3.2.2.4. Acting on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Actions Implemented to Ensure the Confidentiality and Lawful Processing of Customer Data

In line with the European Union's General Data Protection Regulation (GDPR, Regulation (EU) No. 2016/679), Libra Internet Bank has implemented a series of key actions to uphold high standards of personal data protection, directly addressing the material impact area of S4-Privacy. These actions collectively contribute to safeguarding consumer rights, ensuring regulatory compliance, and building stakeholder trust in data handling processes.

One of the primary actions undertaken was the adoption of a formal Personal Data Processing Procedure, applicable to all employees, contractors, associated operators, and authorized persons within the Bank's operational ecosystem. This policy ensures that data is processed lawfully, transparently, and securely in accordance with European standards. The expected outcome of this initiative is the full alignment of data handling practices with GDPR obligations, minimizing the risk of privacy breaches while reinforcing customer confidence. This action applies to all geographic locations in which Libra Internet Bank operates and impacts both upstream (employee handling of data) and downstream (customer and partner) activities. All elements of this policy were fully implemented during the current reporting period.

A second key action includes the involvement of the Data Protection Officer (DPO) in reviewing all contracts and projects that involve personal data. A dedicated internal channel has been set up for staff to request the DPO's review and recommendations. This ensures that privacy risks are mitigated from the project initiation stage. The scope of this action includes supplier relationships, internal policy drafting, and client agreements. Through this proactive oversight, the Bank fosters innovation and product development while remaining compliant with GDPR standards. All related measures were executed during the reporting year.

Finally, the Bank conducted annual inspections across its territorial units and headquarters to monitor compliance and identify potential security risks. These inspections are part of the approved annual plan and incorporate lessons learned from the previous year. The findings inform corrective measures, policy revisions, and staff retraining. The scope of this action includes physical locations, IT systems, and procedural adherence. All inspections were carried out as planned, with findings addressed promptly.

Across these four actions, the Bank has not identified any material negative impacts requiring remedy in the reporting year (MDR-A-d). Moreover, these actions are part of a broader privacy strategy that eliminates the risk of reputational harm or financial penalties. The implementation of GDPR-compliant structures has not only fulfilled regulatory duties but has also advanced the Bank's objectives related to consumer trust, digital resilience, and service excellence. (Disclosure: MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Actions Implemented to Promote and Uphold Freedom of Expression Among Consumers

Libra Internet Bank has implemented a set of targeted actions to strengthen the freedom of expression of its consumers and end users, particularly within the digital banking environment. These actions focus on enabling open, respectful, and inclusive dialogue across multiple touchpoints.

Key activities include maintaining structured feedback tools such as Net Promoter Score (NPS) surveys, encouraging customers to share their experiences and opinions both publicly and privately. The Bank's social media channels have been used not only for promotional content but also for consumer interaction, ensuring that customers feel heard and acknowledged. Additionally, customer complaints and inquiries raised through various channels, including digital apps, call centers, and branches, are systematically reviewed, tracked, and resolved in a timely and transparent manner.

The scope of these actions spans all customer touchpoints, including Internet and Mobile Banking platforms, social media, and in-person service desks. All customer segments, such as retail, corporate, and SME, are included across all operational geographies of the Bank. While current actions have been implemented within the short term, future plans include the integration of advanced sentiment analysis tools and continuous enhancement of communication protocols.

Although no material negative impacts related to freedom of expression were identified during the reporting year, the Bank's grievance mechanisms remain available to consumers. These channels ensure that any concerns raised are promptly and fairly addressed, further reinforcing the Bank's commitment to protecting the voices and rights of its customers (Disclosure: MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e).

Actions Implemented to Enhance Access to Quality Financial Information and Promote Informed Decision-Making

Libra Internet Bank has implemented several initiatives aimed at improving access to high-quality financial and economic information, with a direct contribution to the advancement of consumer and end-user financial literacy and informed decision-making.

One of the flagship initiatives during the reporting period was the organization of “Libra Friends & Trends”, a recurring event that continues to be held across Romanian cities. This time, the focus was on: Ploiești, Tg. Mureș, P-Neamț, Bacău, Suceava, Pitești, Sibiu. These events brought clients into direct contact with top management, who presented insights on macroeconomic trends, financial forecasting, sustainable financing, and data privacy awareness. This direct engagement model fosters an informed customer base, strengthens client relationships, and aligns with the Bank’s strategy of providing expert-driven financial guidance. The scope includes business and retail clients across all operational geographies. The event is held periodically and will be expanded further based on audience feedback and market needs. Feedback collected to date has confirmed growing attendance and high engagement rates, supporting the continued refinement and relevance of the format.

To further enhance the accessibility of economic information for a broader audience, Libra Internet Bank distributed the “Economic and Financial Information Bulletin” a twice-monthly informational bulletin produced by the Market Research and Macroeconomic Department. Covering subjects like inflation, GDP, industry dynamics, and interest rate trends, the bulletin reaches a dedicated subscriber base that includes business clients, journalists, and financial professionals. Its insights contribute directly to users’ understanding of national and international financial developments, providing strategic guidance to navigate economic uncertainty. This initiative is permanent and regularly reviewed for topic expansion and analytical depth. Since its inception, the bulletin has maintained a loyal readership and demonstrated ongoing value, as confirmed through stakeholder feedback.

Together, these actions cover both upstream (internal content production and expert contributions) and downstream (public outreach and customer education) components of the value chain. While no material negative impacts were identified during the reporting year, the Bank’s mechanisms for audience feedback and engagement ensure that the information shared remains accurate, timely, and responsive to users’ evolving needs. These efforts also reinforce the Bank’s regulatory compliance obligations and demonstrate progress against key sustainability goals related to information transparency and financial empowerment (Disclosure: MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e).

Actions Implemented to Promote Responsible Marketing Practices and Transparent Communication

Libra Internet Bank has implemented a series of actions to uphold responsible marketing practices and ensure transparent communication with all customers and end-users. These actions contribute to the protection of consumers from misleading promotions, uphold ethical standards in financial communications, and promote informed decision-making.

One of the core initiatives is the Bank’s commitment to consent-based promotional communication. Libra Internet Bank sends marketing emails only to customers who have explicitly opted in, thereby respecting their communication preferences and complying with privacy and ethical standards. This action applies across all operational geographies and is embedded into the Bank’s ongoing communication strategy. The expected outcome is improved customer trust and reduced reputational risk, as well as regulatory compliance. Any complaints regarding unsolicited communication are promptly resolved, and customers are given clear opt-out mechanisms. Periodic reviews ensure continuous improvement of this process.

In parallel, the Bank ensures full transparency in its financial product communications by clearly presenting all applicable fees, terms, and conditions. All promotional materials undergo review under internal policies such as the Policy on Social Media Communication, the Website Administration Procedure, and the Working Procedure for Promotional Campaigns. These rules govern both upstream (content development and compliance) and downstream (customer-facing delivery) activities, ensuring marketing integrity. These actions are continuously monitored and updated, and the Bank has reported no significant complaints related to misleading marketing during the reporting period.

The events and engagements mentioned above support marketing goals and consumer education simultaneously, with plans for expanded coverage and evolving topics based on participant feedback. (Disclosure: MDR-A-a, MDR-A-b, MDR-A-c, MDR-A-d, MDR-A-e)

Libra Internet Bank has not established dedicated budget lines exclusively for its responsible marketing and transparency-related action plans. Instead, all financial resources required for the implementation of these activities are integrated within the general budgeting processes of the respective departments responsible for execution, such as Marketing, Compliance, and Legal. No green bonds, social bonds, or similar sustainable finance instruments were issued to support these specific actions, and their implementation does not rely on public financial aid or policy-based preconditions. (Disclosure: ESRS 2 MDR-A.69(a))

The current financial resources allocated to responsible marketing practices are embedded in operational expenditure (OpEx) across Marketing and Communications budgets. While these allocations are not itemized in standalone financial statement lines, they are reflected under the broader categories of marketing, customer communication, and compliance costs. (Disclosure: ESRS 2 MDR-A.69(b))

Looking ahead, future financial resources for responsible marketing will continue to be drawn from the same integrated budget framework. No extraordinary capital expenditures (CapEx) are planned for these activities. Instead, enhancements, such as updates to campaign governance tools or customer feedback systems, will be managed through incremental OpEx allocations over the short, medium, and long term, as part of departmental strategic planning cycles. (Disclosure: ESRS 2 MDR-A.69(c))

In accordance with paragraph 31(a), the Bank has established a centralized complaints resolution system, designed to identify, address, and monitor customer grievances efficiently. This system is complemented by proactive service communication mechanisms. For example, in the event of core system maintenance, IT updates, or potential service disruptions due to disaster recovery procedures (BCP_DR), customers receive timely notifications through multiple channels (e.g., Internet Banking/Mobile Banking, email, website banners). These actions are aimed at preventing or mitigating any inconvenience or potential negative experience for customers before it escalates into a material impact. (Disclosure: S4-4 31a)

Regarding paragraph 31(b), when material negative impacts do occur, Libra Internet Bank prioritizes customer-centric remediation. Complaints that reveal significant service failures or operational shortcomings are escalated to relevant departments, with corrective actions implemented promptly. The Bank ensures that impacted customers are informed about the resolution status and provided with compensation or remedial outcomes when appropriate. This approach ensures accountability and swift remediation, especially in events like system downtime, transaction delays, or data privacy breaches. (Disclosure: S4-4 31b)

In addition to reactive and preventive measures, the Bank also undertakes initiatives aimed at positively contributing to social outcomes. Examples include the dissemination of financial literacy content, including regular updates on system security, privacy awareness, and responsible banking practices, as described above. *(Disclosure: S4-4 31c)*

To assess the effectiveness of these actions, as required under paragraph 31(d), Libra Internet Bank conducts regular performance reviews of its communication strategy and complaints management processes. This includes tracking complaint resolution times, analyzing feedback trends, and conducting periodic satisfaction surveys. Outcomes of these reviews feed into process improvements, including adjustments to how service alerts are communicated and how complaints are escalated internally. The objective is to ensure that customer-facing actions are delivering the intended results in terms of satisfaction, transparency, and reduced service disruption. *(Disclosure: S4-4 31d)*

The Bank identifies actual or potential negative impacts primarily through its centralized complaints system and proactive communication practices. Consumer grievances submitted via branches, the call center, mobile and internet banking platforms, or social media are logged and assessed by designated departments. Trends are regularly analyzed to detect recurring issues that may represent broader risks. Additionally, customer engagement data, such as Net Promoter Score (NPS) and satisfaction survey results, serve as early indicators of potential dissatisfaction or systemic problems. When a risk is identified – such as a delayed service, unclear product information, or digital disruption – the Bank initiates a response plan tailored to the severity and nature of the issue. *(Disclosure: S4-4 32a)*

The Bank's approach to managing specific material negative impacts involves both reactive and proactive mechanisms. For instance, if a new product feature is found to be confusing or non-compliant, the Product Development and Marketing teams work in coordination with Compliance and Legal units to revise the feature or its presentation. Marketing content is reviewed before launch to ensure compliance with consumer protection principles, and there are dedicated escalation procedures for high-risk cases involving financial loss or misinformation. In instances where operational issues require cross-functional collaboration – such as IT service outages – the Bank mobilizes both internal teams and external partners (e.g., IT vendors, regulators) to restore normal operations quickly. These approaches are reinforced by a commitment to ethical product design and responsible communication. While industry-level collaboration is not always required, the Bank remains open to it when sector-wide systemic issues emerge, such as cybersecurity risks or regulatory changes. *(Disclosure: S4-4 32b)*

Libra Internet Bank ensures that remedy processes are both available and effective through a continuous improvement cycle. All complaints and service-related reports are registered, monitored, and followed up until closure. The Bank has adopted key risk indicators (KRIs) and Service level agreements (SLA) for complaint resolution timeframes, quality of communication, and customer satisfaction after remediation. Internal audits and compliance reviews also help ensure the process is implemented effectively. Remedies may include service restoration, fee reimbursement, direct customer follow-up, and improvements to internal controls. When necessary, the Bank coordinates with consumer protection bodies (e.g., ANPC) to guarantee independent oversight and reinforce public trust. The effectiveness of these remedies is regularly reviewed through customer feedback mechanisms and performance analytics. *(Disclosure: S4-4 32c)* These measures are designed to ensure operational resilience, customer satisfaction, and compliance with responsible business practices.

The Bank is implementing actions aimed at mitigating material risks associated with operational disruptions and system dependencies. One major area of focus is the enhancement of service continuity protocols, particularly in regard to scheduled core system updates and the Bank's disaster recovery framework (BCP_DR). These actions are critical in managing business continuity and maintaining uninterrupted services for customers. The effectiveness of these measures is tracked using defined internal KRIs and SLAs, including system uptime, response times, and customer feedback collected through the Bank's digital platforms and customer support channels. For example, IT infrastructure uptime metrics are monitored continuously to detect vulnerabilities and address them before they escalate into customer-facing problems. *(Disclosure: S4-4 33a)*

In terms of paragraph 33(b), Libra Internet Bank also leverages its understanding of consumer needs to identify and pursue material opportunities. The Bank seeks to enhance customer experience by streamlining communication flows, minimizing friction in service interactions, and continuously updating and optimizing its digital infrastructure. These initiatives enable the Bank to deliver more responsive, agile, and customer-focused services, creating opportunities to increase customer loyalty, reduce churn, and differentiate itself in a competitive market. For instance, system updates are now coupled with direct notifications and fallback mechanisms to maintain availability, improving client trust and satisfaction. Additionally, continuous upgrades to the Bank's mobile and internet banking platforms are designed to meet evolving customer expectations and expand engagement opportunities. *(Disclosure: S4-4 33b)*

Furthermore, Libra Internet Bank maintains a strong internal governance framework to avoid causing or contributing to material negative impacts through its own practices – particularly in relation to marketing, sales, and data usage. All promotional communication is based on explicit consent, and the Bank avoids aggressive sales tactics by focusing on informed decision-making and customer education. Transparency is prioritized in all customer-facing documents, ensuring that terms, conditions, and fees are clearly communicated. Furthermore, data protection principles – aligned with GDPR – govern all aspects of customer data handling. Where potential tensions arise between commercial goals and ethical obligations (e.g., product profitability vs. transparency), the Bank prioritizes consumer protection. These decisions are guided by internal policies and reviewed by departments such as Legal, Compliance, and IT Security. *(Disclosure: S4-4 34)*

Libra Internet Bank has implemented procedures to monitor and manage any potential human rights concerns connected to its consumer and end-user practices. As part of its commitment to upholding ethical standards, the Bank regularly reviews customer-facing processes to ensure that operations respect human rights principles, including privacy, non-discrimination, freedom of expression, and access to financial services. While no severe human rights incidents have been reported in the reporting period, the Bank maintains systems for early identification and resolution of potential issues, ensuring compliance with human rights. This preventive approach is embedded into daily operations, reinforcing trust and ensuring compliance with fundamental rights protections. *(Disclosure: S4-4 – Par 35)*

To manage its material impacts on consumers, Libra Internet Bank allocates targeted internal resources across relevant departments. This includes dedicated teams in Compliance, Customer Support, IT Security, and Marketing, all of which contribute to identifying, mitigating, and resolving issues that may negatively affect consumers. Financial resources are embedded within departmental budgets and are used to support complaint management systems, digital communication tools, and staff training. The resource allocation is not reported as a separate budget line, as these costs are considered an integral part of daily operations and customer relationship management. In practice, these resources allow the Bank to maintain high-quality service, transparency in communication, and rapid response mechanisms. *(Disclosure: S4-4 – Par 37)*

With regard to the disclosure of reasons for not taking specific sustainability actions, Libra Internet Bank confirms that it has taken the necessary measures to address key consumer-related concerns, including transparency in service disruption communications, enhanced digital infrastructure, and an effective complaint resolution framework. The Bank has not encountered any significant structural, financial, or regulatory barriers that would have prevented the adoption of relevant actions. Nevertheless, it continues to review and adapt its operational approach to ensure continuous improvement in sustainability performance, consumer satisfaction, and responsiveness to emerging challenges. *(Disclosure: S4 MDR-A 13 – Par 62)*

3.2.3. Indicators and Targets

Libra Internet Bank has not currently established specific sustainability-related targets in connection with managing material negative impacts, advancing positive impacts, or mitigating material risks and opportunities. However, the Bank remains committed to regulatory compliance and good practice, applying continuous improvement and ongoing monitoring of its internal systems, operations, and policies. *(Disclosure: MDR-T-81. a)*

In light of this approach, the Bank does not plan to introduce formal sustainability targets for the mentioned IROs, choosing instead to maintain compliance with all applicable legal frameworks in each area of impact. This reflects a strategy focused on risk prevention, legal adherence, and operational effectiveness rather than performance benchmarking through target-setting. *(Disclosure: MDR-T-81. a)*

Nonetheless, Libra Internet Bank continues to monitor and evaluate the effectiveness of its policies and operational actions across various material areas, particularly under its Cybersecurity and Resilience Strategy and its Personal Data Protection Procedure. In the area of cybersecurity, the Bank conducts periodic testing – at least annually – to assess its resilience to cyberattacks. This process includes evaluating prevention, detection, and remediation mechanisms and updating internal controls to respond to new vulnerabilities or threat scenarios. These actions directly support the Bank's broader IT&C risk framework, which is based on the continuous assessment of regulatory alignment, implementation feasibility, control efficiency, and overall security posture. *(Disclosure: MDR-T-81. b)*

For the processing of personal data, the Bank has defined structured processes overseen by the Data Protection Officer (DPO). These include maintaining a centralized Register of Processing Records, immediate intervention and remediation in the event of security incidents, and notifications to the National Supervisory Authority for Personal Data Processing (ANSPDCP) when required. Furthermore, the targeted persons are informed when incidents present significant risks to their fundamental rights and freedoms, in accordance with GDPR requirements. Records of all such incidents are kept, along with documentation detailing remedial steps and outcomes. *(Disclosure: MDR-T-81. b)*

Employee awareness and policy compliance are reinforced through mandatory training sessions, which are conducted at least annually. These trainings focus on personal data protection and employees' obligations under GDPR and national legislation. Attendance is tracked in collaboration with the Human Resources Division, and understanding is assessed via follow-up tests. The DPO is responsible for reporting training results and policy effectiveness to the Bank's senior management, who use this information to ensure decisions are aligned with legal obligations and best practices. *(Disclosure: MDR-T-81. b)*

4. INFORMATION ON MATERIAL GOVERNANCE TOPICS

4.1. Business Conduct

This section outlines Libra Internet Bank's governance framework related to business conduct, focusing on ethical standards, regulatory compliance, and the reinforcement of integrity across its operations. The Bank's approach is rooted in a structured set of internal policies and procedures that guide conduct, support internal accountability, and ensure alignment with legal obligations and international standards.

The disclosures presented here are based on material impacts, risks, and opportunities identified through the Double Materiality Assessment. These include the role of corporate culture in improving customer care, ensuring fairness in service delivery, and enhancing employee wellbeing; the protection of whistle-blowers as a means to foster ethical behavior, accountability, and transparency; and the prevention and detection of unethical practices, including corruption and bribery, both within internal operations and across client relationships. These areas reflect the Bank's efforts to strengthen governance, promote a resilient internal culture, and contribute to broader market stability. Business conduct policies are formalized through key internal documents, including the General Business Strategy, the Code of Banking Ethics, the Internal Organization Regulation, the AML/CFT Norm, and the International Sanctions Management Norm. Together, these instruments establish clear expectations for behavior, decision-making, and compliance across the organization and its value chain. They define the principles underpinning Libra Internet Bank's professional environment, guide the ethical engagement of employees and partners, and create mechanisms for reporting and addressing misconduct.

This chapter provides detailed disclosures in accordance with ESRS G1, covering the scope, governance structure, implementation, stakeholder alignment, and monitoring of each relevant policy. It also describes how internal training, whistleblower protections, and incident response systems are used to support the prevention and mitigation of potential negative impacts related to business conduct.

4.2. Managing impacts, risks and opportunities

4.2.1. Business conduct policies and corporate culture

General Business Strategy

The General Business Strategy defines the foundational values that shape the Bank's corporate culture and decision-making processes. These values include customer orientation, sustainability, ethical cooperation, innovation, work-life balance, and personal accountability. The policy reinforces a culture of high performance and ethical conduct throughout the Bank's operations. It addresses the material impact of corporate culture by promoting transparency, impartial services, and internal cohesion across all departments. These cultural principles contribute directly to improved customer care, stronger client relationships, and enhanced employee morale, as identified in the Double Materiality Assessment. (*Disclosure: MDR-P 65(a)*)

The scope of the strategy covers all operational levels and geographic areas in which the Bank is active. It applies to internal business units as well as upstream partners and downstream client relationships. The policy has no exclusions and acts as the overarching framework through which other internal procedures and regulatory compliance efforts are shaped. The values it sets are reflected consistently in all other internal governance framework and influence both strategic and operational activities across the value chain. *(Disclosure: MDR-P 65(b))*

Accountability for the implementation of the General Business Strategy lies with the Executive Committee, operating under the supervision of the Board of Directors. This structure ensures that the Bank's leadership is directly responsible for embedding the values and objectives outlined in the strategy into all areas of business activity. *(Disclosure: MDR-P 65(c))*

The strategy does not reference specific international third-party frameworks or standards. However, it sets principles that are aligned with the internal ethical and compliance structures of the Bank and supports the implementation of specific standards through more targeted policies (e.g., those addressing compliance, anti-bribery, and employment law). *(Disclosure: MDR-P 65(d))*

The strategy incorporates stakeholder interests by explicitly recognizing the importance of employees, clients, and partners in achieving the Bank's long-term objectives. It emphasizes fair and transparent treatment of customers, collaboration with external partners (including in areas such as innovation and sustainability), and the importance of an engaged workforce. This reflects a deliberate effort to address stakeholder needs in the formulation of strategic direction. *(Disclosure: MDR-P 65(e))*

The policy is not publicly disclosed. However, its principles and core values are presented in the Bank's Annual Transparency Report and referenced in public communications. Internally, the policy is shared with all employees and reinforced through annual training programs, staff communications, and internal compliance monitoring, ensuring that all personnel understand and are aligned with the strategic vision of the Bank. *(Disclosure: MDR-P 65(f))*

Code of Banking Ethics

The Code of Banking Ethics establishes the principles and behavioral expectations that govern all employees conduct at Libra Internet Bank, encompassing interactions with clients, colleagues, authorities, and external stakeholders. It serves as a central instrument for promoting an internal culture rooted in fairness, professionalism, and regulatory compliance. The Code clarifies the shared ethical responsibilities of the organization and its employees, reinforcing accountability and setting clear consequences for misconduct.

The Code also creates a secure and structured environment for internal reporting by establishing dedicated whistleblower channels, including anonymous options, which enable employees to raise concerns without fear of retaliation. This mechanism reinforces ethical governance and strengthens employee morale by demonstrating the Bank's institutional commitment to protecting those who speak up. Additionally, the Code plays a critical preventive function by mandating training on ethical conduct and legal responsibilities. All staff members are expected to understand and adhere to the standards outlined in the Code, with oversight provided by the Ethics Officer. These training and enforcement mechanisms contribute to a culture of integrity and help mitigate risks related to corruption, unethical behavior, or non-compliance. Through these combined functions, the Code directly supports the development of an ethical corporate culture, the protection of internal whistleblowers, and the prevention and detection of misconduct through continuous training and accountability systems. *(Disclosure: MDR-P 65(a))*

The Code applies to all employees of Libra Internet Bank, across all departments and functions, and is binding in all professional interactions—both internal and external. It governs behavior with colleagues, clients, suppliers, competitors, and public institutions. The Code applies strictly within the Bank’s own operations but also indirectly influences third-party interactions by setting conduct expectations for external collaboration. There are no stated exclusions. *(Disclosure: MDR-P 65(b))*

Responsibility for the implementation and oversight of the Code lies with the Chief Risk Officer (CRO) and the Head of Compliance. The designated Ethics Officer oversees enforcement and serves as a contact point for ethical concerns and whistleblower reports. *(Disclosure: MDR-P 65(c))*

The Code of Banking Ethics aligns with applicable regulatory and supervisory frameworks, specifically the National Bank of Romania (NBR) Regulation 5/2013 and the EBA Guidelines on Internal Governance. These external standards underpin the ethical expectations and internal governance structures embedded in the Code, ensuring that the Bank’s approach to business conduct remains consistent with national regulatory requirements and European best practices. *(Disclosure: MDR-P 65(d))*

The Code of Banking Ethics was developed with clear consideration of employee interests, recognizing staff as key stakeholders in upholding the Bank’s ethical standards and achieving its strategic objectives. Employees are encouraged to actively participate in improving operations by proposing ideas that enhance productivity and by reporting behaviors or practices that could pose risks to the organization. The Bank promotes a culture of accountability by emphasizing that all staff have a shared responsibility for maintaining regulatory compliance and professional discipline. To facilitate transparent communication and safeguard employee input, the Bank has established structured internal reporting channels. These include a dedicated ethics officer channel available on the internal Libra Home platform for reporting non-criminal violations of internal rules—such as procedural errors, dress code breaches, or breaches of collegiality—and a separate channel for reporting suspected legal violations, such as abuse of office, bribery, harassment, or other criminal conduct. These mechanisms ensure that employee concerns are addressed responsibly, contributing to a culture of trust, integrity, and operational transparency. *(Disclosure: MDR-P 65(e))*

The full Code is made available to all employees via the Bank’s intranet. Any revisions are communicated internally and addressed during the annual professional training cycle. A summary version is available on the Bank’s public website. *(Disclosure: MDR-P 65(f))*

Internal Organization Regulation of Libra Internet Bank

Internet Bank’s internal governance framework establishes a comprehensive set of operational rules that define the rights and obligations of both the Bank and its employees, ensuring a consistent application of the Bank’s values and fostering a strong corporate culture. The policy includes provisions on employment relations, labor discipline, risk and IT management, health and safety, customer complaints handling, anti-fraud responsibilities, training and career development, employee evaluation, telework, leave entitlements, and internal conduct. It also covers cross-cutting compliance areas such as confidentiality, data protection, and conflict of interest.

By ensuring clarity, structure, and consistency in the governance of day-to-day operations, the IOR supports the material impact associated with a healthy corporate culture, particularly in fostering employee well-being, promoting fair service delivery, and aligning internal conduct with client expectations. These impacts were identified in the Bank’s Double Materiality Assessment. The monitoring of implementation is embedded in operational practices through the enforcement of disciplinary measures, supervisory oversight, and internal audit mechanisms. *(Disclosure: MDR-P 65(a))*

The IOR applies across all the Bank's operational functions and is binding for all employees, managers, and internal collaborators. It governs staff conduct both within headquarters and branch locations. While primarily focused on internal operations, the policy indirectly shapes interactions with external stakeholders—such as clients, suppliers, and partners—through provisions on professional behavior, risk control, and customer service ethics. The IOR does not explicitly cover upstream or downstream third parties, but its rules on conduct, complaints handling, and anti-discrimination have cascading effects on external relationships. There are no exclusions in terms of geography or business line. *(Disclosure: MDR-P 65(b))*

Responsibility for the implementation and oversight of the IOR lies with the Chief Executive Officer and Head of the Human Resources Division. This includes ensuring compliance with the policy across departments, managing updates in accordance with legal changes, and coordinating with other divisions—such as Legal, Compliance, and Risk Management—on cross-functional provisions. *(Disclosure: MDR-P 65(c))*

The Internal Organization Regulation incorporates and aligns with several national and EU-level legal and regulatory frameworks, including:

- ⇒ Romanian Labor Code (Law no. 53/2003)
- ⇒ Decision no. 1500/2024 on the collective bargaining agreement for banking
- ⇒ Occupational health and safety regulations (e.g., Government Decision no. 1425/2006 and no. 955/2010)
- ⇒ Law No. 346/2002 on work accidents and occupational disease insurance
- ⇒ Regulation (EU) 2016/679 (GDPR)

These external standards inform and shape the operational provisions of the IOR, especially in the areas of labor relations, employee rights, health and safety, and data confidentiality. *(Disclosure: MDR-P 65(d))*

The IOR is structured to reflect and balance the interests of key internal and external stakeholders. For employees, it provides clarity on roles, expectations, and protection mechanisms—such as anti-discrimination rules and access to professional development. For clients, the policy ensures that customer concerns are formally addressed, with structured complaints and escalation channels. By reinforcing orderly operations and fair treatment, the policy also protects shareholders and investors, reducing reputational and operational risks and fostering a stable work environment. *(Disclosure: MDR-P 65(e))*

The Internal Organization Regulation is an internal document and is not made publicly available. It is, however, fully accessible to all employees via the Bank's internal intranet platform. Upon hiring, all employees are briefed on its content and required to adhere to its provisions as a condition of employment. Regular updates or amendments are communicated through internal channels. *(Disclosure: MDR-P 65(f))*

KYC/AML/CFT NORM and the International Sanctions Management Norm

The KYC/AML/CFT Norm defines the institutional framework and mandatory processes adopted by Libra Internet Bank to prevent money laundering and the financing of terrorism and to ensure compliance with the relevant sanctions' regimes. The policy is legally anchored in Romania's Law no. 129/2019, Government Emergency Ordinance no. 202/2008, and relevant EU directives (Directive 2015/849 and Directive 2018/843). It outlines customer due diligence (CDD) requirements, continuous monitoring, risk classification methodologies, reporting obligations, and internal control measures. A dedicated section details how employees are to escalate suspicious activity to the National Bank of Romania (NBR) or other competent authorities, either via designated compliance roles or direct digital reporting channels.

The policy directly supports the material sustainability matter of prevention and detection in the financial sector by reducing the Bank's exposure to illicit financial flows and enhancing the integrity of its client portfolio. As assessed in the Double Materiality Assessment, this relates to the material impact of influencing client business conduct and promoting wider market resilience. By requiring upstream compliance with AML/CFT and international sanctions management principles, the Bank encourages counterparties to adopt more robust governance frameworks, contributing to reduced systemic risk. Monitoring is carried out by the Money Laundering Reporting Officer (MLRO), the Compliance Division, and internal audit teams through risk-based control reviews, automated transaction monitoring tools, and recurring regulatory audits. *(Disclosure: MDR-P 65(a))*

The policy applies across the Bank's full range of products, services, and geographies, encompassing all customer segments including individuals, professionals, SMEs, corporates, and occasional clients. It sets out the AML/CFT and international sanctions management responsibilities of front office personnel, compliance officers, and other staff members who interact with clients or process transactions. The scope extends upstream to include suppliers of client onboarding technology and KYC screening services and downstream to beneficiaries and stakeholders indirectly affected by customer-related financial crime risks. Additionally, the policy contains specific obligations for the Bank to cooperate with public authorities, such as FIUs, financial regulators, and law enforcement. There are no stated exclusions. *(Disclosure: MDR-P 65(b))*

Responsibility for implementation and oversight lies with the Chief Risk Officer (CRO), the Money Laundering Reporting Officer (MLRO), and the Head of Compliance. These individuals ensure alignment with legal requirements and manage the escalation of suspicious activities, client risk assessments, and staff training. *(Disclosure: MDR-P 65(c))*

The policy is directly aligned with:

- ⇒ Law no. 129/2019 on the prevention and combating of money laundering and terrorism financing
- ⇒ NBR Regulation 2/2019
- ⇒ Government Emergency Ordinance (GEO) no. 202/2008 regarding the implementation of international sanctions
- ⇒ Directive (EU) 2015/849 and Directive (EU) 2018/843 (AMLD4 and AMLD5)

These legal instruments define the required content and operational application of the policy. *(Disclosure: MDR-P 65(d))*

The policy accounts for the interests of clients, employees, and national authorities. Customers are protected from identity theft and fraud through stringent KYC procedures. Employees are trained to recognize suspicious behavior and fulfill legal obligations while being supported with clear internal reporting tools. Authorities are provided timely and complete reports via established channels. The Bank balances these stakeholder needs by ensuring regulatory compliance while safeguarding the financial system. *(Disclosure: MDR-P 65(e))*

The policy is not publicly available due to its operational sensitivity, but its principles are contractually embedded in client-facing documents such as the General Business Framework Agreement. For employees, the full document is available on the internal intranet and forms part of the mandatory compliance training curriculum. Key principles and obligations are reinforced regularly via internal communications and risk briefings. *(Disclosure: MDR-P 65(f))*

Corporate culture at Libra Internet Bank is defined in the General Business Strategy and operationalized through internal governance documents, including but not limited to the Code of Banking Ethics and the Anti-Harassment Policy. These policies set out expected behaviors, core values, and ethical standards and serve as foundational instruments through which corporate culture is both formalized and reinforced.

The Bank develops and promotes its corporate culture through annual training programs mandatory for the entire workforce. These programs address the practical application of internal policies to employees' daily responsibilities. Training content includes real-life examples, case studies, and compliance scenarios designed to improve policy comprehension and ethical awareness. Completion of the training is verified through mandatory assessments.

The evaluation of corporate culture is based on three primary internal performance indicators:

- ⇒ Training and testing results – Measured through employee performance in mandatory policy assessments, which reflect understanding and internalization of the Bank's ethical framework.
- ⇒ Workforce retention and turnover – Used as a proxy for employee satisfaction and organizational alignment with declared values.
- ⇒ Ethical grievance records – Assessed both in volume and severity to monitor the effectiveness and pervasiveness of the Bank's cultural values in guiding behavior and decision-making.

This integrated approach allows the Bank to systematically cultivate and evaluate its corporate culture, ensuring alignment with its strategic objectives, employee well-being, and stakeholder expectations. (Disclosure: G1-1.9)

Libra Internet Bank has implemented comprehensive mechanisms for identifying, reporting, and investigating concerns related to unlawful behavior or breaches of internal conduct rules. These mechanisms are designed to ensure confidentiality, accountability, and responsiveness, while accommodating reports from both internal and external stakeholders. (Disclosure: G1-1.10(a))

Employees may report violations through dedicated internal channels published on the Bank's intranet (Libra Home). These include:

- ⇒ A direct line to the Ethics Officer for reporting non-criminal breaches of internal rules, such as breaches of procedure, dress code, or collegial conduct.
- ⇒ A separate channel for violations of law, such as bribery, abuse of office, harassment, or corruption.
- ⇒ An external whistleblower platform provided by the National Integrity Agency (ANI), publicly accessible via its official website.

In cases where the Ethics Officer is implicated, employees may escalate their concerns directly to the General Manager, the ANI, or through public disclosure. Reports must include a clear description of the violation, evidence (where applicable), and relevant contextual information. Anonymity is permitted, and anonymous reports are evaluated based on their evidentiary substance.

Following submission, the Ethics Officer acknowledges receipt within 7 calendar days. A full investigation is then conducted, which may include interviews, documentation review, and risk assessment. The whistleblower receives a status update within 3 months. All reports and outcomes are recorded in a confidential electronic register and retained for a period of five years.

Resolution outcomes include either filing (when the report is incomplete or unverifiable) or escalation to the Bank's Management Committee, which determines appropriate enforcement actions while maintaining confidentiality. Clients and suppliers may also report suspected violations through the public email address of the Ethics Officer provided on the Bank's website. (Disclosure: G1-1.10(a))

Libra Internet Bank maintains anti-corruption and anti-bribery policies aligned with all applicable European regulations and guidance, including international frameworks. These policies are consistent with European and national regulations against corruption, and no gaps have been identified that would necessitate further policy development or a specific implementation timeline. *(Disclosure: G1-1.10(b))*

Libra Internet Bank has formalized internal whistleblower protection mechanisms to align with Directive (EU) 2019/1937, ensuring employees can report concerns safely and without fear of retaliation.

i. Establishment and Communication of Channels

Whistleblower reporting channels are clearly outlined in the Code of Banking Ethics and are accessible via the internal Libra Home platform. These channels include:

- ⇒ An internal contact point with the Ethics Officer for violations of internal policies or conduct rules
- ⇒ A separate internal reporting tool for suspected breaches of law
- ⇒ An external option through the National Integrity Agency (ANI), accessible via its public platform

All employees are trained annually on the Bank's business conduct policies, including these reporting mechanisms. Training includes examples of breaches, case studies, and assessments to confirm understanding. Employees also receive guidance on how to use the channels securely and anonymously. The Ethics Officer, designated to receive such reports, is trained to handle them professionally, confidentially, and in compliance with data protection requirements.

ii. Protection Against Retaliation

The Code of Banking Ethics explicitly prohibits retaliation against whistleblowers who act in good faith. Prohibited retaliatory actions include:

- ⇒ Suspension or dismissal
- ⇒ Demotion, reduction of pay, or reassignment
- ⇒ Denial of promotion or negative performance reviews
- ⇒ Harassment, intimidation, or inclusion on blacklists

Retaliation is classified as a serious disciplinary offense, triggering further disciplinary action under the Internal Organization Regulation. The identity of whistleblowers is kept confidential, and all information is managed according to GDPR requirements and the applicable internal regulations. In cases involving reports against the Ethics Officer, escalation paths include reporting to the General Manager, to ANI, or public disclosure. Clients and suppliers can also submit concerns to the public ethics contact published on the Bank's website.

The AML/CFT Norm complements this framework by protecting compliance officers who report suspicious transactions. It allows direct reporting to the National Bank of Romania via a secure portal, ensuring confidentiality is maintained without internal involvement. *(Disclosure: G1-1.10(c))*

The Bank confirms that it has implemented whistleblower protection policies and is fully compliant with relevant laws. No future plans are needed for implementation. *(Disclosure: G1-1.10(d))*

In addition to whistleblower protocols, the Bank has established procedures for promptly, independently, and objectively investigating any incidents of corruption or bribery. These procedures are embedded within the Code of Banking Ethics and mirror those used for general misconduct reporting. They ensure that ethical breaches are systematically assessed and resolved by the Ethics Officer or escalated to management. *(Disclosure: G1-1.10(e))*

Training on business conduct, including anti-bribery, anti-corruption, ethical standards, and whistleblower protection is mandatory for all employees and is delivered annually. Training covers real-life scenarios, employee responsibilities, and expectations for ethical behavior across business functions. *(Disclosure: G1-1.10(g))*

The Bank identifies front-office employees as being the most exposed to risks related to corruption and bribery. These roles involve direct interactions with clients, third-party representatives, and external stakeholders, making them critical targets for integrity controls and behavioral oversight. *(Disclosure: G1-1.10(h))*

4.2.2. Prevention and detection of corruption and bribery

Libra Internet Bank has in place comprehensive procedures to prevent, detect, and address corruption and bribery, as part of its overarching business conduct governance framework. These measures are enforced through the Bank's Code of Banking Ethics, internal training programs, and investigation protocols. *(Disclosure: G1-3.18)*

Prevention and detection mechanisms include annual mandatory training for all employees on general compliance topics, including corruption and bribery. The training clarifies legal definitions, prohibited practices (e.g., accepting gifts or favors), and employee responsibilities in recognizing and reporting suspicious conduct. Training is complemented by periodic communications from the Ethics Officer, who issues guidance reminders to reinforce accountability and awareness of internal standards. *(Disclosure: G1-3.18(a))*

Investigations into allegations of corruption or bribery are conducted by the Bank's Ethics Officer, who is not part of the management hierarchy involved in the case under investigation. This ensures objectivity and mitigates risks of conflict of interest. The Ethics Officer operates independently and has a direct reporting line to senior management, preserving impartiality in the investigative process. *(Disclosure: G1-3.18(b))*

Upon completing an investigation, the Ethics Officer submits a confidential report to the Bank's senior management. The report includes the findings and, where necessary, recommendations for corrective actions. The Management Committee then decides on appropriate enforcement measures in line with the severity and nature of the case. *(Disclosure: G1-3.18(c))*

The Bank confirms that such procedures are fully in place, and therefore no additional implementation plans are required. *(Disclosure: G1-3.19)*

Communication of anti-corruption and anti-bribery policies is ensured through multiple channels:

- ⇒ Annual mandatory training that covers ethical obligations, reporting mechanisms, and legal compliance.
- ⇒ Periodic updates and reminders issued by the Ethics Officer to reinforce policy principles and employee responsibility.
- ⇒ Internal dissemination of policy updates, where revisions to the Code of Ethics are communicated promptly to all staff. These measures ensure accessibility and understanding of the policies across the workforce. *(Disclosure: G1-3.20)*

Anti-bribery and anti-corruption training is integrated into the Bank's general compliance training curriculum, which is delivered annually and is mandatory for all employees. The training includes legal definitions, typical case scenarios, guidance on prohibited behaviors, and instructions for recognizing and reporting breaches. Emphasis is placed on zero tolerance for bribery or gift acceptance. After completing the training, employees are required to pass a test. Failure to pass may influence annual performance evaluations. *(Disclosure: G1-3.21(a))*

The Bank reports that all employees are covered by the training program both through the mandatory annual training in accordance with the procedures in force, and through the specific induction-phase training for new employees, amounting to 100% coverage of functions at risk of exposure to corruption and bribery. This universal application reflects a proactive and preventive approach. *(Disclosure: G1-3.21(b))*

In addition to general employee training, the Bank organizes specialized anti-corruption and anti-bribery training for senior leadership. This training is coordinated annually by the Bank's primary shareholder (NCH) and includes participation from the CEO, Deputy General Managers, Heads of Compliance, Risk, Legal, Operations, IT, and Credit Divisions, among others. This ensures that individuals in strategic roles are equipped to detect and mitigate corruption risks across their areas of responsibility. *(Disclosure: G1-3.21(c))*

Due to limitations in the internal data reporting systems, the category "Other own workers" includes staff members who are also part of the "At-risk functions," "Managers," and "Administrative, Management, and Supervisory Bodies (AMSB)" groups. This reporting structure is necessary because the topics of corruption and bribery fall within the scope of the Bank's mandatory annual training and testing program, which applies to the entire workforce.

All employees holding an active status as of the end of August are required to complete a formal testing session as part of the annual compliance training. For employees hired after this date and prior to the next mandatory cycle, the induction training program includes targeted modules covering key areas of risk, such as anti-fraud, AML/CFT, international sanctions management and general compliance, thereby ensuring full coverage across the workforce. Managers, particularly branch-level leadership, also participate in quarterly compliance meetings with representatives of the Compliance Division. These sessions are held virtually and reinforce awareness of regulatory and ethical standards throughout the year. These activities are tracked and reported under the "Managers" category.

Members of the Board and a selected group of senior managers, including division heads and branch managers, attend annual external training programs coordinated by the Bank's primary shareholder, the NCH Group. In 2025, the training topic focused on anti-bribery and corruption, and participation is documented under the "ASMB" category.

Front-office employees, identified as occupying roles most exposed to bribery and corruption risks, may receive additional ad-hoc training throughout the year based on internal audit findings, compliance control missions, or specific risk incidents. These interventions are applied as targeted measures beyond the standard annual compliance program and are essential for strengthening individual and team-level awareness in higher-risk operational environments. We note that during the reporting period no notifications were recorded concerning acts or facts of bribery or corruption.

Training delivery methods include both classroom-based sessions and computer-based modules. For instance, onboarding training for new hires averages 47 minutes, while recurring compliance-related modules range from 25 to 55 minutes, depending on the topic. Quarterly meetings for managers last approximately 45 minutes per session, and the external anti-bribery training delivered to AMSB participants lasted 60 minutes.

All training is mandatory, and failure to pass post-training assessments impacts the annual employee evaluation process and may also negatively impact the bonus of employees who fall under this scenario. This ensures accountability and reinforces the Bank's zero-tolerance stance on bribery and corruption.

Through this structure, the Bank ensures that anti-bribery and anti-corruption training is systematically applied, adapted by risk exposure and role, and continuously reinforced across all levels of the organization. This approach fulfills the expectations of G1-3.AR 8 by addressing the nature, scope, audience, and frequency of the training and linking coverage to specific risk categories. *(Disclosure: Disclosure – G1-3.AR 8)*

December 2025:

Furthermore, front-office employees, who are part of the "At-risk functions" category, may participate throughout the year in various training and testing sessions based on decisions made following control missions, audit assignments, or reported specific risk incidents.	At-risk functions	Managers	AMSB	Other own workers
Training coverage				
Total	0	2.5	1	3
Total receiving training	0	2.5	1	3
Delivery method and duration				
Classroom training (hours)	0	2.5/participant	1/participant	1.75/participant (mandatory) 2/participant (induction)
Computer-based training (hours)	Mandatory training *already included in "Other own workers" column	Quarterly meeting between Branch Managers and Compliance Department 45 min/meeting (2 meetings/2025) The meeting takes place in MS Teams. In addition, an open session was organized for all employees, recorded and posted on the internal training platform, Libra	Anti Bribery and Corruption (in 2024) 60 mins/participant on average, 23 participants Mandatory Training *already included in "Other own workers" column	Compliance training: 25 mins/ session (average), 1197 employees AML/CFT and international sanctions training: 40 mins/ session (average), 665 employees Antifraud training: 40 mins/ session (average), 1060 employees Induction: 120 mins on average,

		Internet Bank LMS – 60 minutes. *Mandatory training *already included in "Other own workers" column		320 employees 1. Compliance – 40 minutes 2. KYC/AML/CFT – 20 minutes 3. Antifraud – 60 minutes
Voluntary computer-based training (hours)	N/A	N/A	N/A	N/A
Frequency				
How often training is required	Annual	Annual	Annual	Annual
Topics covered				
Definition of corruption	YES	YES	YES	YES
Policy	YES	YES	YES	YES
Procedures on suspicion/detection	YES	YES	N/A	YES

December 2024:

Furthermore, front-office employees, who are part of the "At-risk functions" category, may participate throughout the year in various training and testing sessions based on decisions made following control missions, audit assignments, or reported specific risk incidents.	At-risk functions	Managers	AMSB	Other own workers
Training coverage				
Total	0	3	1	3
Total receiving training	0	3	1	3
Delivery method and duration				
Classroom training (hours)	0	3/participant	1/participant	2/participant (mandatory) 1.5/participant (induction)

Computer-based training (hours)	Mandatory training *already included in "Other own workers" column	Quarterly meeting between Branch Managers and Compliance Department 45 min/meeting (4 meetings/2025) The meeting takes place in MS Teams. *Mandatory training *already included in "Other own workers" column	Anti Bribery and Corruption (in 2024) 60 mins/participant on average, 20 participants Mandatory training *already included in "Other own workers" column	Compliance training: 40 mins/ session (average), 1102 employees KYC/AML/CFT training: 55 mins/ session (average), 596 employees Antifraud training: 25 mins/ session (average), 1052 employees Induction: 90 mins on average, 395 employees 1. Compliance 2. KYC/AML/CFT 3. Antifraud
Voluntary computer-based training (hours)	N/A	N/A	N/A	N/A
Frequency				
How often training is required	Annual	Annual	Annual	Annual
Topics covered				
Definition of corruption	YES	YES	YES	YES
Policy	YES	YES	YES	YES
Procedures on suspicion/detection	YES	YES	N/A	YES

4.2.3. Actions on professional conduct

Actions on Corporate Culture

The Bank conducted a strategic management event involving over 100 internal leaders, including Division Heads, Branch Managers, and Executive Managers. This annual event had a multifaceted structure. It included presentations on organizational performance and strategic direction, followed by a half-day interactive workshop. The workshop focused on communication skills, strategic thinking, planning, and ethical decision-making, delivered through a practical simulation exercise. The key objective was to reinforce ethical leadership, enhance managerial alignment across the institution, and strengthen cohesion between headquarters and branches. This initiative contributes to the corporate culture policy by promoting a shared understanding of ethical leadership and business values among managerial staff. The event covered the entire internal organizational structure with a national geographic scope. It is expected to continue on an annual basis as part of the Bank's leadership development initiatives. *(Disclosure: MDR-A(a)(b)(c)(e))*

Actions on Protection of Whistle-blowers

To support the Bank's internal commitment to ethical governance and legal compliance, a number of actions have been taken to strengthen the protection of whistle-blowers. One key measure is ensuring the confidentiality of all data related to whistleblower reports. This involves the secure handling of sensitive personal information and internal documentation, as well as strict access controls. All submitted reports, whether anonymous or identified, are recorded and stored within a protected electronic register managed by the Ethics Officer. These confidentiality protocols apply across all business units and locations and are fundamental to creating a safe reporting environment. They align with the provisions of the Code of Banking Ethics and support compliance with applicable national legislation and Directive (EU) 2019/1937. *(Disclosure: MDR-A(a)(b))*

In addition to data confidentiality, the Bank has institutionalized the possibility of submitting anonymous reports. Employees are not required to disclose their identity when reporting violations of internal rules or legal obligations. Reports are still subject to full investigation, provided they contain sufficient information. This option encourages individuals to come forward without fear of retaliation, thereby increasing reporting rates and reinforcing the integrity of the internal control environment. Anonymous reporting is available through digital channels accessible via the Bank's intranet and is complemented by secure external reporting options. These measures are applicable across the Bank's entire operational structure and contribute to a resilient culture of accountability. *(Disclosure: MDR-A(a)(b))*

Financial Resources Allocated to the Action Plan

The implementation of the Bank's action plans relating to corporate culture, ethical conduct, and whistleblower protection does not require the establishment of separate or significant capital or operational expenditure lines. All associated costs are integrated within the general budgeting of the respective departments responsible for implementing each action (e.g. Human Resources, Compliance, Communications). As such, there are no distinct financial allocations recorded under separate CapEx or OpEx budget lines for these actions. *(Disclosure: ESRS 2 MDR-A.69(a))*

The financial resources allocated to these initiatives are included within the broader categories of personnel development, staff engagement, and compliance expenditures in the Bank's annual financial statements. Due to the embedded nature of these actions within operational processes, no disaggregated financial amounts are currently presented separately for disclosure purposes. *(Disclosure: ESRS 2 MDR-A.69(b))*

At this time, the Bank has not earmarked future standalone financial resources for these action plans. Continuation and expansion of the programs will remain integrated within the regular operational budgets of the relevant departments and will be adjusted based on strategic planning outcomes and internal demand. *(Disclosure: ESRS 2 MDR-A.69(c))*

4.3. Metrics and Targets

As of the current reporting period, the Bank has not established specific quantitative or qualitative targets under the G1 Business Conduct disclosures. The Bank continues to implement policies and procedures aimed at promoting ethical behavior and preventing corruption or bribery but has not formalized these objectives into defined, measurable targets.

During the reporting period, the Bank recorded zero (0) convictions related to corruption or bribery offenses. No fines or penalties were issued for violations of anti-corruption or anti-bribery laws. *(Disclosure: G1-4.24(a))*

There were no breaches of internal anti-bribery and anti-corruption procedures that required corrective action or remediation during the reporting year. As such, no specific actions were triggered under internal investigation or disciplinary protocols. *(Disclosure: G1-4.24(b))*

5. ANNEXES

5.1. Reporting requirements according to Annex VI - templates for credit institutions' key performance indicators at December 31, 2025

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

Reference date for providing information, December 2025 (T)		Total environmentally sustainable assets	Turnover KPI	CapEx KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	0.00	0.00%	0.00%	64.34%	93.48%	35.66%

		Total environmentally sustainable activities	Turnover KPI (****)	CapEx KPI (*****)
Additional KPIs	GAR (flow)	0	0%	0%
	Trading book*	0	0%	0%
	Financial guarantees	0	0%	0%
	Assets under management	0	0%	0%
	Fees and commissions income**	0	0%	0%

5.1.2. Table 1. Assets included for the calculation of GAR Stock, Turnover view

LEI		Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
-	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	926,141,759.77	530,103,1 39.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3	Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6	Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
7	Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8	of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
12	of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15	Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
16	of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19	Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
20	Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
24	Households*	926,141,759.77	530,103,1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			

LEI		Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
			39.90											
25	of which loans collateralised by residential immovable property	530,103,139.90	530,103,139.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
26	of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
27	of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00							
28	Local governments financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29	Housing financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30	Other local government financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	8,210,808,265.85												
33	Financial and Non-financial undertakings	7,078,980,195.94												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	7,065,993,635.00												
35	Loans and advances	7,047,805,710.93												
36	of which loans collateralised by commercial immovable property	4,510,027,765.49												
37	of which building renovation loans	0.00												
38	Debt securities	0.00												
39	Equity instruments	18,187,924.07												
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,986,560.94												
41	Loans and advances	0.00												
42	Debt securities	0.00												

LEI		Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
43	Equity instruments	12,986,560.94												
44	Derivatives	0.00												
45	On demand interbank loans	1,002,037,571.40												
46	Cash and cash-related assets	61,953,218.39												
47	Other categories of assets (e.g. Goodwill, commodities etc.)	67,837,280.12												
48	Total GAR assets	9,136,950,025.62	530,103,139.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49	Assets not covered for GAR calculation	5,063,969,659.33												
50	Central governments and Supranational issuers	3,142,547,886.12												
51	Central banks exposure	1,921,421,773.21												
52	Trading book	0.00												
53	Total assets	14,200,919,684.95	530,103,139.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
54	Financial guarantees	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55	Assets under management	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56	Of which debt securities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57	Of which equity instruments	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

5.1.2. Table 1. Assets for the calculation of GAR Stock, Turnover view (continued)

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	926,141,759.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)												
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
24 Households*	926,141,759.77	0.00	0.00		0.00	0.00								
25 of which loans collateralised by residential immovable property	530,103,139.90	0.00	0.00		0.00	0.00								
26 of which building renovation loans	-	0.00	0.00		0.00	0.00								
27 of which motor vehicle loans	-													
28 Local governments financing	-	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 Other local government financing	-	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	8,210,808,265.85													
33 Financial and Non-financial undertakings	7,078,980,195.94													
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	7,065,993,635.00													
35 Loans and advances	7,047,805,710.93													
36 of which loans collateralised by commercial immovable property	4,510,027,765.49													
37 of which building renovation loans	0.00													
38 Debt securities	0.00													
39 Equity instruments	18,187,924.07													
40 Non-EU country counterparties not subject to NFRD disclosure obligations	12,986,560.94													
41 Loans and advances	0.00													

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
42 Debt securities	0.00												
43 Equity instruments	12,986,560.94												
44 Derivatives	0.00												
45 On demand interbank loans	1,002,037,571.40												
46 Cash and cash-related assets	61,953,218.39												
47 Other categories of assets (e.g. Goodwill, commodities etc.)	67,837,280.12												
48 Total GAR assets	9,136,950,025.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49 Assets not covered for GAR calculation	5,063,969,659.33												
50 Central governments and Supranational issuers	3,142,547,886.12												
51 Central banks exposure	1,921,421,773.21												
52 Trading book	0.00												
53 Total assets	14,200,919,684.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
54 Financial guarantees	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55 Assets under management	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

5.1.2. Table 1. Assets for the calculation of GAR Stock, Turnover view (continued)

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
- GAR - Covered assets in both numerator and denominator						
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	926,141,759.77	530,103,139.90	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00
24 Households*	926,141,759.77	530,103,139.90	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
25 of which loans collateralised by residential immovable property	530,103,139.90	530,103,139.90	0.00	0.00	0.00	0.00
26 of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00
27 of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00
28 Local governments financing	-	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00	0.00	0.00	0.00
30 Other local government financing	-	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	8,210,808,265.85					
33 Financial and Non-financial undertakings	7,078,980,195.94					
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	7,065,993,635.00					
35 Loans and advances	7,047,805,710.93					
36 of which loans collateralised by commercial immovable property	4,510,027,765.49					
37 of which building renovation loans	0.00					
38 Debt securities	0.00					
39 Equity instruments	18,187,924.07					
40 Non-EU country counterparties not subject to NFRD disclosure obligations	12,986,560.94					
41 Loans and advances	0.00					
42 Debt securities	0.00					
43 Equity instruments	12,986,560.94					
44 Derivatives	0.00					
45 On demand interbank loans	1,002,037,571.40					
46 Cash and cash-related assets	61,953,218.39					
47 Other categories of assets (e.g. Goodwill, commodities etc.)	67,837,280.12					
48 Total GAR assets	9,136,950,025.62	530,103,139.90	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling	
49 Assets not covered for GAR calculation	5,063,969,659.33					
50 Central governments and Supranational issuers	3,142,547,886.12					
51 Central banks exposure	1,921,421,773.21					
52 Trading book	0.00					
53 Total assets	14,200,919,684.95	530,103,139.90	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	292,711,909.33	0.00	0.00	0.00	0.00	0.00
54 Financial guarantees	292,711,909.33	0.00	0.00	0.00	0.00	0.00
55 Assets under management	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans"

5.1.3. Table 2. GAR Sector Information, Turnover view Table 3. GAR KPI Stock, Turnover View

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
		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
		LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (WTR)	LEI Of which environmentally sustainable (WTR)

**No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.*

Table 2. GAR Sector Information, Turnover view Table 3. GAR KPI Stock, Turnover View (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		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	
		LEI	Of which environmentally sustainable (CE)	LEI	Of which environmentally sustainable (CE)	LEI	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	LEI	Of which environmentally sustainable (BIO)	LEI	Of which environmentally sustainable (BIO)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

Table 2. GAR Sector Information, Turnover view Table 3. GAR KPI Stock, Turnover View (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

5.1.4. Table 3. GAR KPI Stock, Turnover View

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
-	<u>GAR - Covered assets in both numerator and denominator</u>													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
24	Households	57.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%								
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	5.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, Turnover View (continued)

% (compared to total covered assets in the denominator)	Disclosure reference date T (FY ending Dec 2025)											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
- GAR - Covered assets in both numerator and denominator												
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20 Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24 Households	0.00%	0.00%	0.00%	0.00%								

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
25	of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%								
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%								
27	of which motor vehicle loans												
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, Turnover View (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	57.24%	0.00%	0.00%	0.00%	0.00%	6.52%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
24	Households	57.24%	0.00%	0.00%	0.00%	0.00%	6.52 %
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	3.73%

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	5.80%	0.00%	0.00%	0.00%	0.00%	64.34%

5.1.5. Table 4. GAR KPI Flow, Turnover view

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling			
-	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	79.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%			0.00%
24	Households	79.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%								
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date T (FY ending Dec 2025)													
% (compared to flow of total eligible assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	commercial immovable properties												
32	Total GAR assets	79.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, Turnover view (continued)

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
-	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date T (FY ending Dec 2025)													
% (compared to flow of total eligible assets)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
UoP													
15 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	
16 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	
20 Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	
24 Households	0.00%	0.00%	0.00%	0.00%									
25 of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%									
26 of which building renovation loans	0.00%	0.00%	0.00%	0.00%									
27 of which motor vehicle loans													
28 Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29 Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, Turnover view (continued)

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	79.30%	0.00%	0.00%	0.00%	0.00%	100.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	
24	Households	79.30%	0.00%	0.00%	0.00%	0.00%	100.00%
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	79.30%
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	79.30%	0.00%	0.00%	0.00%	0.00%	100.00%

5.1.6. Table 5. KPI off-balance sheet exposures, Stock, Turnover view

Disclosure reference date T (FY ending Dec 2025)													
% (compared to total eligible off-balance sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.1.7. Table 5. KPI off-balance sheet exposures, Flow, Turnover view

Disclosure reference date T (FY ending Dec 2025)													
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.1.8. Table 1. Assets for the calculation of GAR Stock, CapEx view

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	926,141,759.77	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
24 Households*	926,141,759.77	530,103,139.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
25 of which loans collateralised by residential immovable property	530,103,139.90	530,103,139.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
26 of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
27 of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00							
28 Local governments financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
30 Other local government financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	8,210,808,265.85												
33 Financial and Non-financial undertakings	7,078,980,195.94												
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	7,065,993,635.00												
35 Loans and advances	7,047,805,710.93												
36 of which loans collateralised by commercial immovable property	4,510,027,765.49												
37 of which building renovation loans	0.00												
38 Debt securities	0.00												
39 Equity instruments	18,187,924.07												
40 Non-EU country counterparties not subject	12,986,560.94												

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
to NFRD disclosure obligations													
41 Loans and advances	0.00												
42 Debt securities	0.00												
43 Equity instruments	12,986,560.94												
44 Derivatives	0.00												
45 On demand interbank loans	1,002,037,571.40												
46 Cash and cash-related assets	61,953,218.39												
47 Other categories of assets (e.g. Goodwill, commodities etc.)	67,837,280.12												
48 Total GAR assets	9,136,950,025.62	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49 Assets not covered for GAR calculation	5,063,969,659.33												
50 Central governments and Supranational issuers	3,142,547,886.12												
51 Central banks exposure	1,921,421,773.21												
52 Trading book	0.00												
53 Total assets	14,200,919,684.95	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling
54 Financial guarantees	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55 Assets under management	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

Table 1. Assets for the calculation of GAR Stock, CapEx view (continued)

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy- aligned)				Of which environmentally sustainable (Taxonomy- aligned)				Of which environmentally sustainable (Taxonomy- aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
- GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	926,141,759.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
24 Households*	926,141,759.77	0.00	0.00	0.00	0.00								
25 of which loans collateralised by residential immovable property	530,103,139.90	0.00	0.00	0.00	0.00								
26 of which building renovation loans	-	0.00	0.00	0.00	0.00								
27 of which motor vehicle loans	-												
28 Local governments financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 Other local government financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	8,210,808,265.85												
33 Financial and Non-financial undertakings	7,078,980,195.94												
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	7,065,993,635.00												
35 Loans and advances	7,047,805,710.93												
36 of which loans collateralised by	4,510,027,765.49												

Disclosure reference date T (FY ending Dec 2025)													
LEI	Total [gross] carrying amount	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy- aligned)				Of which environmentally sustainable (Taxonomy- aligned)				Of which environmentally sustainable (Taxonomy- aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
commercial immovable property													
37 of which building renovation loans	0.00												
38 Debt securities	0.00												
39 Equity instruments	18,187,924.07												
Non-EU country counterparties 40 not subject to NFRD disclosure obligations	12,986,560.94												
41 Loans and advances	0.00												
42 Debt securities	0.00												
43 Equity instruments	12,986,560.94												
44 Derivatives	0.00												
45 On demand interbank loans	1,002,037,571.40												
46 Cash and cash-related assets	61,953,218.39												
47 Other categories of assets (e.g. Goodwill, commodities etc.)	67,837,280.12												
48 Total GAR assets	9,136,950,025.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49 Assets not covered for GAR calculation	5,063,969,659.33												
50 Central governments and Supranational issuers	3,142,547,886.12												
51 Central banks exposure	1,921,421,773.21												
52 Trading book	0.00												
53 Total assets	14,200,919,684.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
disclosure obligations													
54 Financial guarantees	292,711,909.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55 Assets under management	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

Table 1. Assets for the calculation of GAR Stock, CapEx view (continued)

LEI	Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	926,141,759.77	530,103,139.90	0.00	0.00	0.00	0.00
2	Financial undertakings	-	0.00	0.00	0.00	0.00	0.00
3	Credit institutions	-	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
6	Equity instruments	-	0.00	0.00		0.00	0.00
7	Other financial corporations	-	0.00	0.00	0.00	0.00	0.00
8	of which investment firms	-	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	-	0.00	0.00		0.00	0.00
12	of which management companies	-	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
15	Equity instruments	-	0.00	0.00		0.00	0.00
16	of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
19	Equity instruments	-	0.00	0.00		0.00	0.00
20	Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00
21	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
23	Equity instruments	-	0.00	0.00		0.00	0.00
24	Households*	926,141,759.77	530,103,139.90	0.00	0.00	0.00	0.00
25	of which loans collateralised by residential immovable property	530,103,139.90	530,103,139.90	0.00	0.00	0.00	0.00
26	of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00
27	of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00

LEI		Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)				
			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling	
28	Local governments financing	-	0.00	0.00	0.00	0.00	0.00
29	Housing financing	-	0.00	0.00	0.00	0.00	0.00
30	Other local government financing	-	0.00	0.00	0.00	0.00	0.00
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	8,210,808,265.85					
33	Financial and Non-financial undertakings	7,078,980,195.94					
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	7,065,993,635.00					
35	Loans and advances	7,047,805,710.93					
36	of which loans collateralised by commercial immovable property	4,510,027,765.49					
37	of which building renovation loans	0.00					
38	Debt securities	0.00					
39	Equity instruments	18,187,924.07					
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,986,560.94					
41	Loans and advances	0.00					
42	Debt securities	0.00					
43	Equity instruments	12,986,560.94					
44	Derivatives	0.00					
45	On demand interbank loans	1,002,037,571.40					
46	Cash and cash-related assets	61,953,218.39					
47	Other categories of assets (e.g. Goodwill, commodities etc.)	67,837,280.12					
48	Total GAR assets	9,136,950,025.62	530,103,139.90	0.00	0.00	0.00	0.00
49	Assets not covered for GAR calculation	5,063,969,659.33					
50	Central governments and Supranational issuers	3,142,547,886.12					
51	Central banks exposure	1,921,421,773.21					
52	Trading book	0.00					
53	Total assets	14,200,919,684.95	530,103,139.90	0.00	0.00	0.00	0.00

LEI		Total [gross] carrying amount	Disclosure reference date T (FY ending Dec 2025)				
			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				
					Of which Use of Proceeds	Of which transitional	Of which enabling
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	292,711,909.33	0.00	0.00	0.00	0.00	0.00
54	Financial guarantees	292,711,909.33	0.00	0.00	0.00	0.00	0.00
55	Assets under management	0.00	0.00	0.00	0.00	0.00	0.00
56	Of which debt securities	0.00	0.00	0.00	0.00	0.00	0.00
57	Of which equity instruments	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

5.1.9. Table 2. GAR Sector Information, CapEx view

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
		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
		LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (WTR)	LEI Of which environmentally sustainable (WTR)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

Table 2. GAR Sector Information, CapEx view (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
		Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	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
		LEI Of which environmentally sustainable (CE)	LEI Of which environmentally sustainable (CE)	LEI Of which environmentally sustainable (PPC)	Mn EUR Of which environmentally sustainable (PPC)	LEI Of which environmentally sustainable (BIO)	LEI Of which environmentally sustainable (BIO)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

Table 2. GAR Sector Information, CapEx view (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)

**No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.*

5.1.10. Table 3. GAR KPI Stock, CapEx view

% (compared to total covered assets in the denominator)	Disclosure reference date T (FY ending Dec 2025)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%			0.00%
24	Households	57.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%								

Disclosure reference date T (FY ending Dec 2025)														
% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	5.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, CapEx view (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
GAR - Covered assets in both numerator and denominator													
-	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
6	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
11	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
15	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
19	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
23	Households	0.00%	0.00%	0.00%	0.00%								
24													

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
25	of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%								
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%								
27	of which motor vehicle loans												
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, CapEx view (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which enabling	
	Of which Use of Proceeds		Of which transitional				
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.24%	0.00%	0.00%	0.00%	0.00%	6.52%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which enabling	
	Of which Use of Proceeds		Of which transitional				
24	Households	57.24%	0.00%	0.00%	0.00%	0.00%	6.52%
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	3.73%
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	5.80%	0.00%	0.00%	0.00%	0.00%	64.34%

5.1.11. Table 4. GAR KPI Flow, CapEx view

% (compared to flow of total eligible assets)	Disclosure reference date T (FY ending Dec 2025)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
- GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	79.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20 Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%			0.00%
24	Households	79.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%								
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	79.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, CapEx view (continued)

% (compared to flow of total eligible assets)	Disclosure reference date T (FY ending Dec 2025)											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
- GAR - Covered assets in both numerator and denominator												
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20 Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24 Households	0.00%	0.00%	0.00%	0.00%								

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
25	of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%								
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%								
27	of which motor vehicle loans												
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, CapEx view (continued)

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Of which Use of Proceeds	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	79.30%	0.00%	0.00%	0.00%	0.00%	100.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T (FY ending Dec 2025)						Proportion of total new assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
				Of which Use of Proceeds	Of which transitional	Of which enabling		
24	Households	79.30%	0.00%	0.00%	0.00%	0.00%	100.00%	
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	79.30%	
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
32	Total GAR assets	79.30%	0.00%	0.00%	0.00%	0.00%	100.00%	

5.1.12. Table 5. KPI off-balance sheet exposures, Stock, CapEx view

Disclosure reference date T (FY ending Dec 2025)													
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.1.13. Table 5. KPI off-balance sheet exposures, Flow, CapEx view

Disclosure reference date T (FY ending Dec 2025)													
% (compared to total eligible off-balance sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T (FY ending Dec 2025)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.1.14. Template 1 Nuclear and fossil gas related activities

* The Bank has no off-balance exposure from entities which qualify as reporters under the CSRD (not under the obligation to report) and EU Taxonomy (not operating under a Nuclear Energy and Fossil Gas eligible NACE code, nor financing such economic activities) legislation, Hence, templates 2 to 5 have not been reported on any of the relevant KPIs, stock or flow, on/off balance sheet.

Stock as of December 31, 2025

On-balance Stock, Turnover view			Off-balance Stock, Turnover view		
Row	Nuclear energy related activities		Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No	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	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	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
Row	Fossil gas related activities			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	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	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	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

On-balance Stock, CapEx view

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
Row	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

Off-balance Stock, CapEx view

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
Row	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

Template 1 Nuclear and fossil gas related activities (continued)

* The Bank has no off-balance exposure from entities which qualify as reporters under the CSRD (not under the obligation to report) and EU Taxonomy (not operating under a Nuclear Energy and Fossil Gas eligible NACE code, nor financing such economic activities) legislation, Hence, templates 2 to 5 have not been reported on any of the relevant KPIs, stock or flow, on/off balance sheet.

Flow as of December 31, 2025

On-balance Flow, Turnover view			Off-balance Flow, Turnover view		
Row	Nuclear energy related activities		Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No	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	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	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
Row	Fossil gas related activities			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	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	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	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

On-balance Flow, CapEx view

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
Row	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

Off-balance Flow, CapEx view

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
Row	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. Reporting requirements according to Annex VI - templates for credit institutions' key performance indicators at December 31, 2024

5.2.1. *Table 0 - Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation*

Reference date for providing information, December 2024 (T-1)		Total environmentally sustainable assets	Turnover KPI (****)	CapEx KPI (*****)	% coverage (over total assets) (***)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	0.00	0.00%	0.00%	62.79%	92.45%	37.21%

		Total environmentally sustainable activities	Turnover KPI (****)	CapEx KPI (*****)
Additional KPIs	GAR (flow)	0	0%	0%
	Trading book*	0	0%	0%
	Financial guarantees	0	0%	0%
	Assets under management	0	0%	0%
	Fees and commissions income**	0	0%	0%

5.2.2. Table 1. Assets for the calculation of GAR Stock, Turnover view

[illegible]

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LEI		Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
37	of which building renovation loans	-												
38	Debt securities	-												
39	Equity instruments	17,321,107.67												
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,932,099.71												
41	Loans and advances	-												
42	Debt securities	-												
43	Equity instruments	12,932,099.71												
44	Derivatives	-												
45	On demand interbank loans	1,010,217,649.81												
46	Cash and cash-related assets	89,282,553.82												
47	Other categories of assets (e.g. Goodwill, commodities etc.)	87,010,675.30												
48	Total GAR assets	8,144,153,156.09	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49	Assets not covered for GAR calculation	4,826,422,799.58												
50	Central governments and Supranational issuers	2,543,671,326.76												

		Disclosure reference date T-1 (FY ending Dec 2024)												
LEI	Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling		
51 Central banks exposure	2,282,751,472.82													
52 Trading book	-													
53 Total assets	12,970,575,955.67	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
54 Financial guarantees	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55 Assets under management	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

Table 1. Assets for the calculation of GAR Stock, Turnover view (continued)

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling		
- GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	979,647,454.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
24 Households*	979,647,454.00	0.00	0.00	0.00	0.00								
25 of which loans collateralised by	566,212,999.71	0.00	0.00	0.00	0.00								

LEI		Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling
	residential immovable property													
26	of which building renovation loans	-	0.00	0.00	0.00	0.00								
27	of which motor vehicle loans	-												
28	Local governments financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
29	Housing financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
30	Other local government financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,164,505,702.09												
33	Financial and Non-financial undertakings	5,977,994,823.16												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,965,062,723.45												
35	Loans and advances	5,947,741,615.78												
36	of which loans collateralised by commercial immovable property	4,248,599,257.95												
37	of which building renovation loans	-												
38	Debt securities	-												
39	Equity instruments	17,321,107.67												
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,932,099.71												
41	Loans and advances	-												
42	Debt securities	-												
43	Equity instruments	12,932,099.71												
44	Derivatives	-												
45	On demand interbank loans	1,010,217,649.81												
46	Cash and cash-related assets	89,282,553.82												
47	Other categories of assets (e.g.	87,010,675.30												

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling						
Goodwill, commodities etc.)													
48 Total GAR assets	8,144,153,156.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
49 Assets not covered for GAR calculation	4,826,422,799.58												
50 Central governments and Supranational issuers	2,543,671,326.76												
51 Central banks exposure	2,282,751,472.82												
52 Trading book	-												
53 Total assets	12,970,575,955.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
54 Financial guarantees	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
55 Assets under management	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
56 Of which debt securities	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
57 Of which equity instruments	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

Table 1. Assets for the calculation of GAR Stock, Turnover view (continued)

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
- GAR - Covered assets in both numerator and denominator						
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	979,647,454.00	566,212,999.71	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00
24 Households*	979,647,454.00	566,212,999.71	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Proceeds	Use of transitional	Of which enabling	
25 of which loans collateralised by residential immovable property	566,212,999.71	566,212,999.71	0.00	0.00	0.00	0.00
26 of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00
27 of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00
28 Local governments financing	-	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00	0.00	0.00	0.00
30 Other local government financing	-	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,164,505,702.09					
33 Financial and Non-financial undertakings	5,977,994,823.16					
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,965,062,723.45					
35 Loans and advances	5,947,741,615.78					
36 of which loans collateralised by commercial immovable property	4,248,599,257.95					
37 of which building renovation loans	-					
38 Debt securities	-					
39 Equity instruments	17,321,107.67					
40 Non-EU country counterparties not subject to NFRD disclosure obligations	12,932,099.71					
41 Loans and advances	-					
42 Debt securities	-					
43 Equity instruments	12,932,099.71					
44 Derivatives	-					
45 On demand interbank loans	1,010,217,649.81					
46 Cash and cash-related assets	89,282,553.82					
47 Other categories of assets (e.g. Goodwill, commodities etc.)	87,010,675.30					
48 Total GAR assets	8,144,153,156.09	566,212,999.71	0.00	0.00	0.00	0.00

LEI		Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)					
			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
			Of which environmentally sustainable (Taxonomy-aligned)					
			Of which Proceeds	Use of	Of which transitional	Of which enabling		
49	Assets not covered for GAR calculation	4,826,422,799.58						
50	Central governments and Supranational issuers	2,543,671,326.76						
51	Central banks exposure	2,282,751,472.82						
52	Trading book	-						
53	Total assets	12,970,575,955.67	566,212,999.71	0.00	0.00	0.00	0.00	
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	334,380,576.46	0.00	0.00	0.00	0.00	0.00	
54	Financial guarantees	334,380,576.46	0.00	0.00	0.00	0.00	0.00	
55	Assets under management	-	0.00	0.00	0.00	0.00	0.00	
56	Of which debt securities	-	0.00	0.00	0.00	0.00	0.00	
57	Of which equity instruments	-	0.00	0.00	0.00	0.00	0.00	

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

5.2.3. Table 2. GAR Sector Information, Turnover view Table 3. GAR KPI Stock, Turnover View

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
		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
		LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (WTR)	LEI Of which environmentally sustainable (WTR)

**No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.*

Table 2. GAR Sector Information, Turnover view Table 3. GAR KPI Stock, Turnover View (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		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	
		LEI	Of which environmentally sustainable (CE)	LEI	Of which environmentally sustainable (CE)	LEI	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	LEI	Of which environmentally sustainable (BIO)	LEI	Of which environmentally sustainable (BIO)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

Table 2. GAR Sector Information, Turnover view Table 3. GAR KPI Stock, Turnover View (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)

**No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.*

5.2.4. Table 3. GAR KPI Stock, Turnover View

% (compared to total covered assets in the denominator)	Disclosure reference date T-1 (FY ending Dec 2024)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
	companies													
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%			0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%			0.00%
24	Households	57.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
27	of which motor vehicle	0.00%	0.00%	0.00%	0.00%	0.00%								

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
	loans													
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	6.95%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, Turnover View (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
-	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24	Households	0.00%	0.00%	0.00%	0.00%								
25	of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%								
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%								
27	of which motor vehicle loans												
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, Turnover View (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.80%	0.00%	0.00%	0.00%	0.00%	7.55%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)							
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered		
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Of which Use of Proceeds		Of which transitional	Of which enabling
24	Households	57.80%	0.00%	0.00%	0.00%	0.00%	7.55%		
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	4.37%		
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
32	Total GAR assets	6.95%	0.00%	0.00%	0.00%	0.00%	62.79%		

5.2.5. Table 4. GAR KPI Flow, Turnover view

% (compared to flow of total eligible assets)	Disclosure reference date T-1 (FY ending Dec 2024)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	23.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling				
	companies												
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
24	Households	23.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
27	of which motor vehicle	0.00%	0.00%	0.00%	0.00%	0.00%							

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling					
	loans													
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	23.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, Turnover view (continued)

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
-	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Disclosure reference date T-1 (FY ending Dec 2024)													
% (compared to flow of total eligible assets)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%
20 Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%
24 Households	0.00%	0.00%	0.00%	0.00%									
25 of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%									
26 of which building renovation loans	0.00%	0.00%	0.00%	0.00%									
27 of which motor vehicle loans													
28 Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29 Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30 Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32 Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, Turnover view (continued)

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	23.56%	0.00%	0.00%	0.00%	0.00%	100.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)						Proportion of total new assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
		Of which Use of Proceeds	Of which transitional	Of which enabling				
24	Households	23.56%	0.00%	0.00%	0.00%	0.00%	100.00%	
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	23.56%	
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
32	Total GAR assets	23.56%	0.00%	0.00%	0.00%	0.00%	100.00%	

5.2.6. Table 5. KPI off-balance sheet exposures, Stock, Turnover view

Disclosure reference date T-1 (FY ending Dec 2024)													
% (compared to total eligible off-balance sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, Turnover view (continued)

Disclosure reference date T-1 (FY ending Dec 2024)													
% (compared to total eligible off-balance sheet assets)		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.2.7. Table 5. KPI off-balance sheet exposures, Flow, Turnover view

Disclosure reference date T -1 (FY ending Dec 2024)													
% (compared to total eligible off-balance sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, Turnover view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.2.8. Table 1. Assets for the calculation of GAR Stock, CapEx view

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
- GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	979,647,454.00	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2 Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3 Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
7 Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8 of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
12 of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00		0.00
16 of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
18 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
20 Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21 Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22 Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23 Equity instruments	-	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
24 Households*	979,647,454.00	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
25 of which loans collateralised by residential immovable property	566,212,999.71	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
26 of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			
27 of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00							
28 Local governments financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 Other local government financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,164,505,702.09												
33 Financial and Non-financial undertakings	5,977,994,823.16												

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,965,062,723.45												
35 Loans and advances	5,947,741,615.78												
36 of which loans collateralised by commercial immovable property	4,248,599,257.95												
37 of which building renovation loans	-												
38 Debt securities	-												
39 Equity instruments	17,321,107.67												
40 Non-EU country counterparties not subject to NFRD disclosure obligations	12,932,099.71												
41 Loans and advances	-												
42 Debt securities	-												
43 Equity instruments	12,932,099.71												
44 Derivatives	-												
45 On demand interbank loans	1,010,217,649.81												
46 Cash and cash-related assets	89,282,553.82												
47 Other categories of assets (e.g. Goodwill, commodities etc.)	87,010,675.30												
48 Total GAR assets	8,144,153,156.09	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49 Assets not covered for GAR calculation	4,826,422,799.58												

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
50 Central governments and Supranational issuers	2,543,671,326.76												
51 Central banks exposure	2,282,751,472.82												
52 Trading book	-												
53 Total assets	12,970,575,955.67	566,212,999.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
54 Financial guarantees	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55 Assets under management	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

Table 1. Assets for the calculation of GAR Stock, CapEx view (continued)

LEI		Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)											
			Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
-	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	979,647,454.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	Financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3	Credit institutions	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
6	Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
7	Other financial corporations	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8	of which investment firms	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
12	of which management companies	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
15	Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
16	of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
19	Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
20	Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
21	Loans and advances	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	Equity instruments	-	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00
24	Households*	979,647,454.00	0.00	0.00	0.00	0.00								
25	of which loans collateralised by residential immovable property	566,212,999.71	0.00	0.00	0.00	0.00								
26	of which building renovation loans	-	0.00	0.00	0.00	0.00								

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)										
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)		Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)		Of which enabling		Of which environmentally sustainable (Taxonomy-aligned)		Of which enabling
		Of which Proceeds	Use of Proceeds			Of which Proceeds	Use of Proceeds			Of which Proceeds	Use of Proceeds	
27 of which motor vehicle loans	-											
28 Local governments financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
29 Housing financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
30 Other local government financing	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,164,505,702.09											
33 Financial and Non-financial undertakings	5,977,994,823.16											
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,965,062,723.45											
35 Loans and advances	5,947,741,615.78											
36 of which loans collateralised by commercial immovable property	4,248,599,257.95											
37 of which building renovation loans	-											
38 Debt securities	-											
39 Equity instruments	17,321,107.67											
40 Non-EU country counterparties not subject to NFRD disclosure obligations	12,932,099.71											
41 Loans and advances	-											
42 Debt securities	-											
43 Equity instruments	12,932,099.71											
44 Derivatives	-											
45 On demand interbank loans	1,010,217,649.81											
46 Cash and cash-related assets	89,282,553.82											
47 Other categories of assets (e.g. Goodwill, commodities etc.)	87,010,675.30											
48 Total GAR assets	8,144,153,156.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49 Assets not covered for GAR calculation	4,826,422,799.58											
50 Central governments and Supranational issuers	2,543,671,326.76											
51 Central banks exposure	2,282,751,472.82											

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)										
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)		
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling
52 Trading book	-											
53 Total assets	12,970,575,955.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
54 Financial guarantees	334,380,576.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
55 Assets under management	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

Table 1. Assets for the calculation of GAR Stock, CapEx view (continued)

LEI		Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)				
			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	979,647,454.00	566,212,999.71	0.00	0.00	0.00	0.00
2	Financial undertakings	-	0.00	0.00	0.00	0.00	0.00
3	Credit institutions	-	0.00	0.00	0.00	0.00	0.00
4	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
5	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
6	Equity instruments	-	0.00	0.00		0.00	0.00
7	Other financial corporations	-	0.00	0.00	0.00	0.00	0.00
8	of which investment firms	-	0.00	0.00	0.00	0.00	0.00
9	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
10	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
11	Equity instruments	-	0.00	0.00		0.00	0.00
12	of which management companies	-	0.00	0.00	0.00	0.00	0.00
13	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
14	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
15	Equity instruments	-	0.00	0.00		0.00	0.00
16	of which insurance undertakings	-	0.00	0.00	0.00	0.00	0.00
17	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
18	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
19	Equity instruments	-	0.00	0.00		0.00	0.00
20	Non-financial undertakings	-	0.00	0.00	0.00	0.00	0.00
21	Loans and advances	-	0.00	0.00	0.00	0.00	0.00
22	Debt securities, including UoP	-	0.00	0.00	0.00	0.00	0.00
23	Equity instruments	-	0.00	0.00		0.00	0.00
24	Households*	979,647,454.00	566,212,999.71	0.00	0.00	0.00	0.00
25	of which loans collateralised by residential immovable property	566,212,999.71	566,212,999.71	0.00	0.00	0.00	0.00
26	of which building renovation loans	-	0.00	0.00	0.00	0.00	0.00
27	of which motor vehicle loans	-	0.00	0.00	0.00	0.00	0.00
28	Local governments financing	-	0.00	0.00	0.00	0.00	0.00
29	Housing financing	-	0.00	0.00	0.00	0.00	0.00
30	Other local government financing	-	0.00	0.00	0.00	0.00	0.00
31	Collateral obtained by taking possession: residential and commercial	-	0.00	0.00	0.00	0.00	0.00

LEI	Total [gross] carrying amount	Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
immovable properties						
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	7,164,505,702.09					
33 Financial and Non-financial undertakings	5,977,994,823.16					
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	5,965,062,723.45					
35 Loans and advances	5,947,741,615.78					
36 of which loans collateralised by commercial immovable property	4,248,599,257.95					
37 of which building renovation loans	-					
38 Debt securities	-					
39 Equity instruments	17,321,107.67					
40 Non-EU country counterparties not subject to NFRD disclosure obligations	12,932,099.71					
41 Loans and advances	-					
42 Debt securities	-					
43 Equity instruments	12,932,099.71					
44 Derivatives	-					
45 On demand interbank loans	1,010,217,649.81					
46 Cash and cash-related assets	89,282,553.82					
47 Other categories of assets (e.g. Goodwill, commodities etc.)	87,010,675.30					
48 Total GAR assets	8,144,153,156.09	566,212,999.71	0.00	0.00	0.00	0.00
49 Assets not covered for GAR calculation	4,826,422,799.58					
50 Central governments and Supranational issuers	2,543,671,326.76					
51 Central banks exposure	2,282,751,472.82					
52 Trading book	-					
53 Total assets	12,970,575,955.67	566,212,999.71	0.00	0.00	0.00	0.00
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations	334,380,576.46	0.00	0.00	0.00	0.00	0.00
54 Financial guarantees	334,380,576.46	0.00	0.00	0.00	0.00	0.00
55 Assets under management	-	0.00	0.00	0.00	0.00	0.00
56 Of which debt securities	-	0.00	0.00	0.00	0.00	0.00
57 Of which equity instruments	-	0.00	0.00	0.00	0.00	0.00

* The Households category includes all consumer lending activity, beyond what is reflected via the three reporting categories "of which loans collateralised by residential immovable property", "of which building renovation loans", "of which motor vehicle loans".

5.2.9. Table 2. GAR Sector Information, CapEx view

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Water and marine resources (WTR)	
		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
		LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCM)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (CCA)	LEI Of which environmentally sustainable (WTR)	LEI Of which environmentally sustainable (WTR)

**No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.*

Table 2. GAR Sector Information, CapEx view (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	Circular economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
		Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	Non-Financial corporates (Subject to NFRD)	SMEs and other NFC not subject to NFRD	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
		LEI Of which environmentally sustainable (CE)	LEI Of which environmentally sustainable (CE)	LEI Of which environmentally sustainable (PPC)	Mn EUR Of which environmentally sustainable (PPC)	LEI Of which environmentally sustainable (BIO)	LEI Of which environmentally sustainable (BIO)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

Table 2. GAR Sector Information, CapEx view (continued)

Breakdown by sector - NACE 4 digits level (code)	Breakdown by sector - NACE 4 digits level (code and label)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount	
		LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	LEI	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)

*No data has been reported since there is no exposure from entities which have an eligible NACE code EU Taxonomy wise, and which are also subject to reporting obligations under the NFRD/CSRD.

5.2.10. Table 3. GAR KPI Stock, CapEx view

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)		
		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling
-	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)	Disclosure reference date T-1 (FY ending Dec 2024)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
22 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24 Households	57.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
25 of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
26 of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
27 of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%								
28 Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29 Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30 Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32 Total GAR assets	6.95%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, CapEx view (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
-	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24	Households	0.00%	0.00%	0.00%	0.00%								

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
25	of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%								
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%								
27	of which motor vehicle loans												
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 3. GAR KPI Stock, CapEx view (continued)

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which enabling	
	Of which Use of Proceeds		Of which transitional				
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.80%	0.00%	0.00%	0.00%	0.00%	7.55%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%

% (compared to total covered assets in the denominator)		Disclosure reference date T-1 (FY ending Dec 2024)						
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered	
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling		
24	Households						57.80%	0.00%
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.37%
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	6.95%	0.00%	0.00%	0.00%	0.00%	0.00%	62.79%

5.2.11. Table 4. GAR KPI Flow, CapEx view

% (compared to flow of total eligible assets)	Disclosure reference date T-1 (FY ending Dec 2024)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
- GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	23.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3 Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16 of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20 Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)	Disclosure reference date T-1 (FY ending Dec 2024)												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
22 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23 Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24 Households	23.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
25 of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
26 of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
27 of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%								
28 Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29 Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30 Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32 Total GAR assets	23.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, CapEx view (continued)

% (compared to flow of total eligible assets)	Disclosure reference date T-1 (FY ending Dec 2024)											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-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 Proceeds	Use of	Of which enabling		Of which Proceeds	Use of	Of which enabling		Of which Proceeds	Use of	Of which enabling	
-	GAR - Covered assets in both numerator and denominator											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%
24	Households	0.00%	0.00%	0.00%	0.00%								
25	of which loans collateralised by residential immovable property	0.00%	0.00%	0.00%	0.00%								
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%								
27	of which motor vehicle loans												
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 4. GAR KPI Flow, CapEx view (continued)

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds		Of which transitional	Of which enabling	
-	GAR - Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	23.56%	0.00%	0.00%	0.00%	0.00%	100.00%
2	Financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
7	Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	Equity instruments	0.00%	0.00%		0.00%	0.00%	0.00%
24	Households	23.56%	0.00%	0.00%	0.00%	0.00%	100.00%
25	of which loans collateralised by residential immovable property	100.00%	0.00%	0.00%	0.00%	0.00%	23.56%
26	of which building renovation loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

% (compared to flow of total eligible assets)		Disclosure reference date T-1 (FY ending Dec 2024)					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which Use of Proceeds	Of which transitional	
29	Housing financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	23.56%	0.00%	0.00%	0.00%	0.00%	100.00%

5.2.12. Table 5. KPI off-balance sheet exposures, Stock, CapEx view

Disclosure reference date T-1 (FY ending Dec 2024)													
% (compared to total eligible off-balance sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, CapEx view (continued)

Disclosure reference date T-1 (FY ending Dec 2024)													
% (compared to total eligible off-balance sheet assets)	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Stock, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.2.13. Table 5. KPI off-balance sheet exposures, Flow, CapEx view

Disclosure reference date T-1 (FY ending Dec 2024)													
% (compared to total eligible off-balance sheet assets)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T-1 (FY ending Dec 2024)											
		Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Table 5. KPI off-balance sheet exposures, Flow, CapEx view (continued)

% (compared to total eligible off-balance sheet assets)		Disclosure reference date T-1 (FY ending Dec 2024)				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
2	Assets under management (AuM KPI)	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which debt securities	0.00%	0.00%	0.00%	0.00%	0.00%
	Of which equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%

5.2.14. Template 1 Nuclear and fossil gas related activities

* The Bank has no off-balance exposure from entities which qualify as reporters under the CSRD (not under the obligation to report) and EU Taxonomy (not operating under a Nuclear Energy and Fossil Gas eligible NACE code, nor financing such economic activities) legislation, Hence, templates 2 to 5 have not been reported on any of the relevant KPIs, stock or flow, on/off balance sheet.

Stock

On-balance Stock, Turnover view			Off-balance Stock, Turnover view		
Row	Nuclear energy related activities		Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No	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	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	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
Row	Fossil gas related activities			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	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	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	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

On-balance Stock, CapEx view

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
Row	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

Off-balance Stock, CapEx view

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
Row	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

Template 1 Nuclear and fossil gas related activities (continued)

* The Bank has no off-balance exposure from entities which qualify as reporters under the CSRD (not under the obligation to report) and EU Taxonomy (not operating under a Nuclear Energy and Fossil Gas eligible NACE code, nor financing such economic activities) legislation, Hence, templates 2 to 5 have not been reported on any of the relevant KPIs, stock or flow, on/off balance sheet.

Flow

On-balance Flow, Turnover view			Off-balance Flow, Turnover view		
Row	Nuclear energy related activities		Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No	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	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	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
Row	Fossil gas related activities			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	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	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	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

On-balance Flow, CapEx view

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
Row	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

Off-balance Flow, CapEx view

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
Row	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

Chairman of the Board of Directors
Radu Grațian Ghețea



Vice-Chairman of the Board of Directors
Eugen Goga



Statement

In accordance with the provisions of Article 30 of Accounting Law no. 82/1991, republished, and of Article 65 paragraph (2) letter c) of Law no. 24/2017 on issuers and of Article 223 letter A paragraph 1 c) of ASF Regulation no. 5/2018 on issuers of financial instruments and market operations, I assume responsibility for the preparation of the annual financial statements as at 31.12.2025 and certify that, to the best of my knowledge:

- a. The accounting policies used for the preparation of the financial statements as at 31.12.2025 are in accordance with the accounting regulations applicable to credit institutions, based on National Bank of Romania Order no. 27/2010 for the approval of the accounting regulations in line with the International Financial Reporting Standards adopted by the European Union, as subsequently amended and supplemented, in force as at the reporting date 31.12.2025;
- b. The financial statements as at 31.12.2025 present a true and fair view of the assets, liabilities, financial position, profit and loss account, and include a fair analysis of the development and performance of the Bank, as well as a description of the main risks and uncertainties specific to the activity carried out. They are prepared in accordance with the sustainability reporting standards referred to in Article 29b of Directive 2013/34/EU and with the specifications adopted pursuant to Article 8 paragraph (4) of Regulation (EU) 2020/852;
- c. Libra Internet Bank SA operates on a going concern basis;
- d. The Board of Directors' Report on the above-mentioned financial statements presents fully and correctly the information as at the reporting date.

Radu Gratian Ghetea
Chairman of the Board of Directors



INDEPENDENT LIMITED ASSURANCE REPORT ON THE SUSTAINABILITY STATEMENT FOR THE FINANCIAL YEAR 2025

To the Shareholders of Libra Internet Bank S.A.

Limited Assurance Conclusion

We have conducted a limited assurance engagement on the Sustainability Statement included in Chapter 12 from the Report of the Board of Directors of Libra Internet Bank S.A. (the "Bank") with registered office in Calea Vitan, no. 6-6A, Building Phoenix Tower, district 3, Bucharest, identified by unique tax registration code RO 8119644, as at December 31, 2025 and for the period from January 1, 2025 to December 31, 2025 (the "Sustainability Statement").

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Sustainability Statement is not prepared, in all material respects, in accordance with local law Order No. 1/2024 amending and supplementing NBR Order no. 27/2010 approving the Accounting Regulations in compliance with International Financial Reporting Standards implementing 29(a) of the EU Directive 2013/34/EU ("Sustainability Legislation"), including:

- Compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Bank to identify the information reported in the Sustainability Statement is in accordance with the description set out in chapter 1, sub-chapter 1.3, sections 1.3.2 "Interests and views of stakeholders" and 1.3.3 "Material impacts, risks and opportunities and their interaction with the strategy and business model" and in sub-chapter 1.4, section 1.4.1 "Disclosures on the process of the Double Materiality Assessment" ("Double Materiality Assessment Process"); and
- Compliance of the relevant taxonomy disclosures detailed in chapter 2, sub-chapter 2.3 "Presentation of information in accordance with Article 8 of Regulation (EU) 2020/852 (EU Taxonomy Regulation)" of the Sustainability Statement with the applicable reporting requirements of Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

Basis for Conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements other than audits or reviews of historical financial information.

Our responsibilities under this standard are further described in the Auditor's Responsibilities section of our report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Emphasis of Matter

We draw attention to the fact that, in our limited assurance report dated 24 April 2025 for the financial year ended 31 December 2024, we expressed a qualified limited assurance conclusion in relation to the estimation of Scope 3 GHG emissions category 15 ("Financed Emissions") presented in Chapter 2, Sub-Chapter 2.1.3, Section 2.1.3.3 "Gross GHG Emissions from Scopes 1, 2, 3 and Total GHG Emissions (E1-6)", due to inability to obtain sufficient appropriate evidence regarding the estimate of Financed Emissions as of 31 December 2024.

As disclosed in the note on Scope 3, Category 15 GHG emissions ("Financed emissions") included in Chapter 2, Sub-chapter 2.1, Section 2.1.3.3 "Gross GHG emissions from Scopes 1, 2, 3 and total GHG emissions (E1-6)" in the Sustainability Statement for the financial year ended 31 December 2025, the Bank has revised the methodology used to calculate Financed Emissions and corrected the comparative information for the period ended 31 December 2024. During the course of our limited assurance engagement on the Sustainability Statement as of 31 December 2025, we obtained sufficient appropriate evidence in relation to the estimation of Financed emissions, including comparative information. Our conclusion is not modified in respect of this matter.

Identification of Applicable Criteria

The Sustainability Statement was prepared by the Management of the Bank in order to satisfy the requirements of the Sustainability Legislation, including:

- Compliance with the European Sustainability Reporting Standards introduced by Commission Delegated Regulation (EU) of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council (“ESRS”), including that the process carried out by the Bank to identify the information reported in the Sustainability Statement (the “Process”) is in accordance with the description set out in the related chapters of the “Double Materiality Assessment Process”; and
- Compliance of the relevant taxonomy disclosures detailed chapter 2, sub-chapter 2.3 “Presentation of information in accordance with Article 8 of Regulation (EU) 2020/852 (EU Taxonomy Regulation)” of the Sustainability Statement with Article 8 of EU Regulation 2020/852 (the “Taxonomy Regulation”).

Inherent Limitations in Preparing the Sustainability Statement

The criteria, nature of the Sustainability Statement, and absence of long-standing established authoritative guidance, standard applications and reporting practices allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different organizations and from year to year within an organization as methodologies evolve.

In reporting forward looking information in accordance with ESRS, Administrators of the Bank are required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Bank. Actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Sustainability Statement, Administrators of the Bank interpret undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

Responsibility for the Sustainability Statement

Administrators of the Bank are responsible for designing, implementing, and maintaining a process to identify the information reported in the Sustainability Statement in accordance with the ESRS and for disclosing this process in related chapters of the “Double Materiality Assessment Process” of the Sustainability Statement.

This responsibility includes:

- understanding the context in which the Bank’s activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Bank’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

Administrators of the Bank is further responsible for the preparation of the Sustainability Statement, in accordance with local Sustainability Legislation, including:

- compliance with the ESRS;
- preparing the relevant taxonomy disclosures of the Sustainability Statement, in chapter 2, sub-chapter 2.3, in compliance with Article 8 of EU Regulation 2020/852 (the “Taxonomy Regulation”);
- designing, implementing and maintaining such internal controls that management determines are necessary to enable the preparation of the Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group sustainability reporting process.

Auditor's Responsibility

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional skepticism throughout the engagement.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities in respect of the Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Designing and performing procedures to evaluate whether the Process is consistent with the Bank's description of its Process, as disclosed in related chapters of the Double Materiality Assessment Process.

Our other responsibilities in respect of the Sustainability Statement include:

- Obtaining an understanding of the entity's control environment, processes and information systems relevant to the preparation of the Sustainability Statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error.
- Designing and performing procedures responsive to disclosures in the Sustainability Statement where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Our Independence and Quality Management

We complied with the applicable independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (the "Code"). The Code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We applied International Standard on Quality Management (ISQM) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and

- reviewing the Bank's internal documentation of its Process;
- Evaluated whether the evidence obtained from our procedures about the Process implemented by the Bank was consistent with the description of the process set out in related chapters of the "Double Materiality Assessment Process".

In conducting our limited assurance engagement, with respect to the Sustainability Statement, we:

- Obtained an understanding of the Bank's reporting processes relevant to the preparation of its Sustainability Statement by
 - performing inquiries to understand the Bank's control environment, processes and information systems relevant to the preparation of the Sustainability Statement;
- Evaluated whether material information identified by the Process to identify the information reported in the Sustainability Statement is included in the Sustainability Statement;
- Evaluated whether the structure and the presentation of the Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Sustainability Statement;
- Performed substantive assurance procedures based on a sample basis on selected disclosures in the Sustainability Statement;
- Obtained evidence on the methods for developing material estimates and forward-looking information and on how these methods were applied;
- Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the EU Taxonomy;
- Performed substantive assurance procedures based on a sample basis on selected EU Taxonomy disclosures;

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Claudiu Ghiurluc, Audit Partner

*For signature, please refer to the original
Romanian version.*

*Registered in the Electronic Public Register of Financial
Auditors and Audit Firms under no. AF 3113*

On behalf of:

DELOITTE AUDIT SRL

*Registered in the Electronic Public Register of Financial
Auditors and Audit Firms under no. FA 25*

The Mark Building, 84-98 and 100-102 Calea Grivitei, 9th Floor, District 1
Bucharest, Romania
28 April 2026

LIBRA INTERNET BANK S.A

FINANCIAL STATEMENTS

STANDALONE AND SEPARATE

31 DECEMBER 2025

PREPARED IN ACCORDANCE WITH

INTERNATIONAL FINANCIAL REPORTING STANDARDS, AS ADOPTED BY

THE EUROPEAN UNION

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INDEPENDENT AUDITOR'S REPORT

To the Shareholders,
Libra Internet Bank S.A.

Report on the Audit of the financial statements

Opinion

1. We have audited the standalone and separate financial statements of Libra Internet Bank S.A. ("the Bank"), with registered office in Calea Vitan no. 6-6A, District 1, Bucharest, Romania, identified by unique tax registration code RO 8119644 which comprise the standalone and separate statement of financial position as at 31 December 2025, the standalone and separate statement of profit or loss, the standalone and separate statement of comprehensive income, the standalone and separate statement of changes in equity and the standalone and separate statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.
2. The financial statements as at 31 December 2025 are identified as follows:
 - Individual financial statements

	- Equity	RON 1,758,934,251
	- Net profit for the financial year	RON 326,050,867
 - Separate financial statements

	- Equity	RON 1,754,175,739
	- Net profit for the financial year	RON 324,048,123
3. In our opinion:
 - the accompanying separate financial statements present fairly, in all material respects, the financial position of the Bank as at 31 December 2025, its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union ("IFRS as Adopted by EU") and the National Bank of Romania Order no. 27/2010 for the approval of accounting regulations in accordance with IFRS as Adopted by EU applicable to credit institutions, with subsequent amendments ("Order 27/2010").

Basis for Opinion

4. We conducted our audit in accordance with International Standards on Auditing (ISAs), Regulation (EU) No. 537/2014 of the European Parliament and the Council (herein after referred to as "Regulation") and Law 162/2017 on the statutory audit of annual financial statements and annual consolidated financial statements and on amending other pronouncements (herein after referred to as "Law 162/2017"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Bank in accordance with the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), in accordance with ethical requirements relevant for the audit of the financial statements in Romania including the Regulation and the Law 162/2017, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

5. Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Nature of the area of focus	How our audit addressed the key audit matter
Collective impairment of loans and advances to customers	
According to IFRS 9, the Bank accounts for credit losses on loans and advances to customers based on expected credit losses (ECL): for a period up to 12 months for credit exposures for which the credit risk did not increase significantly since origination, and throughout the credit, as detailed in significant increase in credit risk and measurement of the expected credit loss allowance policy from Note 3, chapter II, letter (d) to the financial statements. As at 31 December 2025, the Bank registered an impairment allowance in amount of RON 294,987 thousand for Loans and advances to customers in gross amount of RON 8,693,566 thousand. The Bank exercises significant professional judgement using complex models, extensive data and subjective assumptions over both when and how much to record as impairment for loans. Because loans and advances granted to customers form a major portion of the Bank's assets, and due to the significance of the management professional judgments applied in classifying loans and advances granted to customers receivables into various stages stipulated in IFRS 9 and determining the related impairment level, this audit area is considered a key audit matter. Key areas of professional judgment included: • utilization of historical data for determining risk parameters; • the interpretation of the requirements to determine impairment under application of IFRS 9, which is reflected in the expected credit loss model; • assumptions used in the expected credit loss models to assess the credit risk related to the exposure and the expected future cash flows of the customers; • the identification of exposures with a high level of significant deterioration in credit quality and the industries affected by the restrictions imposed as a result of current economic environment; • potential impact on the assumptions used, increases in credit risk and impairments, and future cash flows as a result of the current social and economic conditions; • assessment of the forward-looking information.	Based on our risk assessment and industry knowledge, with the support of our credit risk experts, we have examined the impairment charges for loans and evaluated the methodology applied as well as the key assumptions made by the management according to the description of the key audit matter. Our procedures included the following elements: 1) Testing of key controls: We have checked the adequacy of the key processes and related key controls applied by management to ensure accuracy of impairment calculation, including: • key controls identified to ensure quality assurance of the methodological aspects used in the development of professional judgments and the ECL models; • key controls related to timely identification of impairment triggers and significant increase in credit risk; • key controls to assess the debtors' financial performance and estimate future cash flows. For the relevant key controls identified in addressing the risks, we have tested the design and operating effectiveness of such controls. 2) Testing the implementation of the ECL computation methodology into the IT system, including: • test the general IT controls related to data sources and computations of ECL; • assessment on a sample basis of the credit quality and stage allocation; • test on a sample basis the ECL computations. 3) Obtaining and analysing the information to support the key assumptions used in: • development of the models for the key risk parameters computation (12-month probability of default, lifetime probability of default and loss given default), including procedures on the source data quality; • development of the expected credit loss models; • development and adequacy of the stage allocation and the criteria used to determine the significant increase in credit risk; • development of models to reflect the potential impact of future economic conditions in the ECL computation; • assessment of the adequacy of the analysis and adjustments made by the management, on all the aspects pertaining to the estimation of expected credit losses, including prospective information on customers loans. We have assessed whether the material information on ECL presented in the financial statements is adequate, in accordance with the applicable IFRS requirements.

Nature of the area of focus	How our audit addressed the key audit matter
Interest Income Recognition	
Refer to Note 6 of the financial statements. For the year ended 31 December 2025 the Bank's interest income represents RON 969,863 thousand, the main source being loans and advances to customers. These are the main contributors to the operating income of the Bank, affecting the Bank's profitability. Interest income from loans and advances to customers is accrued over the expected life of the financial instrument using the effective interest rate. Fees that are directly attributable to the financial instrument are part of the effective interest rate and accrued over the expected life of such an instrument and are presented as interest income. Revenue recognition specifics, a high volume of individually small transactions which depends on data quality of interest and fee inputs and on IT system for their recording, resulted in this matter being identified as a key audit matter.	- We have tested the design and operating effectiveness of the key internal controls and focused on: • data input on interest and directly attributable fees for loans and advances to customers; • management oversight and control on interest income results, including budget monitoring; • IT controls relating to access rights and change management of relevant automated controls, with the assistance of our IT specialists. - We performed also the following procedures with regard to interest income recognition: • We evaluated the accounting treatment in respect of fees charged to clients to determine whether the methodology complies with the requirement of the relevant accounting standard. We have focused our testing on challenging the correct classification of fees that are identified as directly attributable to the financial instrument and are part of the effective interest rate; • For a sample of loan contracts, we assessed the completeness and accuracy of data used for the calculation of interest incomes; • We evaluated the mathematical formula used for accruing the relevant interest income over expected life of the loan; • We have assessed the interest income by building our own expectation on the revenue and compared with the actual results. - We have assessed the presentation in financial statements of the interest income in accordance with the applicable IFRS requirements.

Other information – Administrators' Report

6. The administrators are responsible for the preparation and presentation of the other information. The other information comprises the Administrators' report which includes the sustainability report, but does not include the separate and consolidated financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements for the year ended 31 December 2025, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

Other reporting responsibilities with respect to other information – Administrators' Report

With respect to the Administrators' report, we read and report if this has been prepared, in all material respects, in accordance with the provisions of National Bank of Romania Order no. 27/2010, articles 12-17.

On the sole basis of the procedures performed within the audit of the financial statements, in our opinion:

- a) The information included in the Administrators' report for the financial year for which the financial statements have been prepared are consistent, in all material respects, with these financial statements;

- b) The management report has been prepared, in all significant aspects, in accordance with the National Bank of Romania Order no. 27/2010, Articles 12-17.

Moreover, based on our knowledge and understanding concerning the Bank and its environment gained during the audit on the financial statements prepared as at 31 December 2025, we are required to report if we have identified a material misstatement of this Administrators' report. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

7. Management is responsible for the preparation and fair presentation of the financial statements in accordance with Order 27/2010 and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.
8. In preparing the financial statements, management is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Bank or to cease operations, or has no realistic alternative but to do so.
9. Those charged with governance are responsible for overseeing the Bank's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

10. Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.
11. As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:
 - Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
 - Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.
 - Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
 - Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern.
 - Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
12. We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.
13. We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

14. From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

Requirements for audits of public interest entities

15. We have been appointed by the General Meeting of Shareholders dated September 2, 2021 to audit the financial statements of Libra Internet Bank S.A. for the financial year ended 31 December 2025. The uninterrupted total duration of our commitment is 4 years, covering the financial year ended 31 December 2022, financial year ended 31 December 2023, financial year ended 31 December 2024 and financial year ended 31 December 2025.

We confirm that:

- Our audit opinion is consistent with the additional report submitted to the Audit Committee of the Bank that we issued the same date we issued this report. Also, in conducting our audit, we have retained our independence from the Bank.
- No non-audit services referred to in Article 5 (1) of EU Regulation No. 537/2014 were provided.

The engagement partner on the audit resulting in this independent auditor's report is Claudiu Ghiurluc.

Report on the Information Regarding Income Tax

16. For the financial year preceding the financial year for which the separated and consolidated financial statements were prepared, the Bank was not required under National Bank of Romania Order no. 27/2010 for the approval of accounting regulations in accordance with IFRS as Adopted by EU applicable to credit institutions, with subsequent amendments, articles 574 - 5710, to publish a report on income tax information.

Report on compliance with the Law 162/2017 on the statutory audit of annual financial statements and annual consolidated financial statements and on amending other pronouncements ("Law 162/2017"), and Commission Delegated Regulation (EU) 2018/815 on the European Single Electronic Format Regulatory Technical Standard ("ESEF")

17. We have undertaken a reasonable assurance engagement on the compliance with Law 162/2017, and Commission Delegated Regulation (EU) 2018/815 applicable to the financial statements included in the annual financial report of Libra Internet Bank S.A. ("the Bank") as presented in the digital file 315700WKDD4ZSRL7HW38 ("Digital Files").

(I) Responsibilities of management and those charged with governance for the Digital Files prepared in compliance with the ESEF

Management of the Bank is responsible for preparing Digital Files that comply with the ESEF. This responsibility includes:

- the design, implementation and maintenance of internal control relevant to the application of the ESEF;
- ensuring consistency between the Digital Files and the financial statements to be submitted in accordance with Order 27/2010.

Those charged with governance are responsible for overseeing the preparation of the Digital Files that comply with ESEF.

(II) Auditor's Responsibilities for Audit of the Digital Files

Our responsibility is to express a conclusion on whether the financial statements included in the annual financial report complies in all material respects with the requirements of ESEF based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ISAE 3000) issued by the International Auditing and Assurance Standards Board.

Our firm applies International Standard on Quality Management 1 ("ISQM1"), and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

A reasonable assurance engagement in accordance with ISAE 3000 involves performing procedures to obtain evidence about compliance with ESEF. The nature, timing and extend of procedures selected depend on the auditor's judgment, including the assessment of the risks of material departures from the requirements set out in ESEF, whether due to fraud or error. A reasonable assurance engagement includes:

- obtaining an understanding of the Bank's and Bank's process for preparation of the digital files in accordance with ESEF, including relevant internal controls;
- reconciling the digital files including the marked-up data with the audited financial statements of the Bank to be submitted in accordance with Order 27/2010;
- evaluating if all financial statements contained in the annual report have been prepared in a valid XHTML format.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Conclusion

In our opinion, the financial statements for the year ended 31 December 2025 included in the annual financial report in the Digital Files comply in all materials respects with the requirements of ESEF.

In this section, we do not express an audit opinion, review conclusion or any other assurance conclusion on the financial statements. Our opinion relating to the financial statements of the Bank for the year ended 31 December 2025 is set out in the "Report on the audit of the financial statements" section above.

Claudiu Ghiurluc, Audit Partner

For signature, please refer to the original signed Romanian version.

Registered in the Electronic Public Register of Financial Auditors and Audit Firms under no. AF 3113

On behalf of:

DELOITTE AUDIT SRL

Registered in the Electronic Public Register of Financial Auditors and Audit Firms under no. FA 25

The Mark Building, 84-98 and 100-102 Calea Grivitei, 9th Floor, District 1
Bucharest, Romania
April 28, 2026

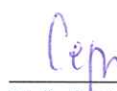
LIBRA INTERNET BANK S.A.

STANDALONE AND SEPARATE STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME

<i>In RON</i>	Note	Standalone 2025	Standalone 2024	Separate 2025	Separate 2024
Interest income calculated using the effective interest method	6	969,863,468	914,795,542	969,863,468	914,795,542
Interest expenses	6	-303,623,096	-296,533,618	-303,623,096	-296,533,618
Net interest income		666,240,372	618,261,924	666,240,372	618,261,924
Fee and commission income	7	151,312,857	149,679,843	151,312,857	149,679,843
Fee and commission expenses	7	-64,511,381	-66,021,228	-64,511,381	-66,021,228
Net fee and commission income		86,801,476	83,658,615	86,801,476	83,658,615
Net income from financial instruments at FVTPL		2,315,217	3,278,965	2,315,217	3,278,965
Share of income/(loss) from associates	16	2,002,744	1,696,400	-	-
Net gains from foreign exchange transactions and revaluation	8	72,365,270	54,065,995	72,365,270	54,065,995
Other operating income	9	9,114,424	7,039,121	9,114,424	7,039,121
Total operating income		838,839,503	768,001,020	836,836,759	766,304,620
Personnel expenses	10	-288,061,566	-233,341,771	-288,061,566	-233,341,771
Expenses with amortization and depreciation	10	-20,187,146	-19,059,171	-20,187,146	-19,059,171
Other operating expenses	10	-145,905,374	-117,919,660	-145,905,374	-117,919,660
Total operating expenses	10	-454,154,086	-370,320,601	-454,154,086	-370,320,601
Profit before impairments and taxes		384,685,417	397,680,419	382,682,673	395,984,019
Net income (expense) with impairment of financial instruments	11	-2,820,144	-77,773,579	-2,820,144	-77,773,579
Profit before tax		381,865,274	319,906,840	379,862,529	318,210,440
Income tax expense	12	-55,814,406	-47,988,593	-55,814,406	-47,988,593
Net profit for the financial year		326,050,867	271,918,247	324,048,123	270,221,847
Other items of comprehensive income		-	-	-	-
Total comprehensive income		326,050,867	271,918,247	324,048,123	270,221,847

The financial statements were approved by the Board of Directors on 21 April 2026:


 Lucian Claudiu Anghel,
 Deputy General Manager


 Melinda Cepi,
 Head of Finance Division

The accompanying notes form an integral part of these standalone and separate financial statements.

LIBRA INTERNET BANK S.A.
STANDALONE AND SEPARATE STATEMENT OF FINANCIAL POSITION

<i>In RON</i>	Note	Standalone 31 December 2025	Standalone 31 December 2024	Separate 31 December 2025	Separate 31 December 2024
Assets					
Cash on hand	13 (ii)	61,953,218	89,282,554	61,953,218	89,282,554
Financial assets at fair value through profit or loss	16	21,374,485	20,453,208	21,374,485	20,453,208
Loans and advances to the National Bank of Romania	13 (iv)	1,921,623,531	2,282,980,518	1,921,623,531	2,282,980,518
Loans and advances granted to banks	13 (ii)	915,792,479	959,943,957	915,792,479	959,943,957
Loans and advances granted to customers	14	8,398,579,405	7,196,501,880	8,398,579,405	7,196,501,880
Investment securities at amortized cost	16	2,357,090,250	1,967,390,959	2,357,090,250	1,967,390,959
Investment in associates	17	14,558,512	12,555,767	9,800,000	9,800,000
Assets held for sale	19	232,302	613,302	232,302	613,302
Property, plant and equipment	18	44,105,909	51,341,936	44,105,909	51,341,936
Intangible assets	18	1,460,587	2,611,783	1,460,587	2,611,783
Deferred tax assets	12	8,880,734	7,995,231	8,880,734	7,995,231
Current tax assets		-	5,055,830	-	5,055,830
Other assets	15	161,489,956	120,682,460	161,489,956	120,682,460
Total assets		13,907,141,368	12,717,409,383	13,902,382,857	12,714,653,618
Liabilities and equity					
Deposits from customers	21	11,671,054,227	10,827,475,936	11,671,054,227	10,827,475,936
Deposits from other banks	20	1,936,730	853,213	1,936,730	853,213
Loans from financial institutions	22	8,259,261	6,260,852	8,259,261	6,260,852
Bonds issued	22	249,138,016	242,558,835	249,138,016	242,558,835
Subordinated loan	22	76,217,279	74,259,371	76,217,279	74,259,371
Provisions	23	50,941,339	45,662,759	50,941,339	45,662,759
Current tax liabilities		5,077,510	-	5,077,510	-
Other liabilities	24	85,582,754	87,455,036	85,582,754	87,455,036
Total liabilities		12,148,207,118	11,284,526,002	12,148,207,118	11,284,526,002
Share capital	25	556,171,200	556,171,200	556,171,200	556,171,200
Reserves	26	338,306,723	319,313,597	338,306,723	319,313,597
Retained earnings		864,456,327	557,398,586	859,697,816	554,642,819
Total equity		1,758,934,251	1,432,883,383	1,754,175,739	1,430,127,616
Total liabilities and equity		13,907,141,368	12,717,409,383	13,902,382,857	12,714,653,618

The financial statements were approved by the Board of Directors on 21 April 2026:


Lucian Claudiu Anghel,
 Deputy General Manager


Melinda Cepi,
 Head of Finance Division

The accompanying notes form an integral part of these standalone and separate financial statements.

LIBRA INTERNET BANK S.A.

STANDALONE STATEMENT OF CHANGES IN EQUITY

In RON	Note	Share capital	Legal reserve	Other reserves	Retained earnings	Total
Balance as at 1 January 2024		506,165,200	65,925,126	287,483,949	401,390,862	1,260,965,137
Profit for the year		-	-	-	271,918,247	271,918,247
<i>Other comprehensive income, net of tax</i>		-	-	-	-	-
Total comprehensive income	26	-	-	-	271,918,247	271,918,247
Transfer to legal reserves	26	-	15,910,522	-	-15,910,522	-
Distribution of profit to reserves	26	-	-	-	-100,000,000	-100,000,000
Dividends distributed	26	50,006,000	-	-50,006,000	-	-
Share capital increase	26	50,006,000	-	-	-	-
Total distributions and contributions		50,006,000	15,910,522	-50,006,000	156,007,728	171,918,247
Balance as at 31 December 2024		556,171,200	81,835,648	237,477,949	557,398,587	1,432,883,383
Balance as at 1 January 2025		556,171,200	81,835,648	237,477,949	557,398,587	1,432,883,383
Profit for the financial year		-	-	-	326,050,867	326,050,867
<i>Other comprehensive income, net of tax</i>		-	-	-	-	-
Total comprehensive income	26	-	-	-	326,050,867	326,050,867
Transfer to legal reserves	26	-	18,993,126	-	-18,993,126	-
Distribution of profit to reserves	26	-	-	-	-	-
Dividends distributed	26	-	-	-	-	-
Share capital increase	26	-	-	-	-	-
Total distributions and contributions		-	18,993,126	-	307,057,741	326,050,867
Balance as at 31 December 2025		556,171,200	100,828,774	237,477,949	864,456,327	1,758,934,251

The financial statements were approved by the Board of Directors on 21 April 2026:

Lucian Claudiu Anghel,
Deputy General Manager

Melinda Cepi,
Head of Finance Division

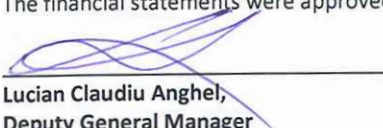
The accompanying notes form an integral part of these standalone and separate financial statements.

LIBRA INTERNET BANK S.A.

SEPARATE STATEMENT OF CHANGES IN EQUITY

<i>In RON</i>	Note	Share capital	Legal reserve	Other reserves	Retained earnings	Total
Balance as at 1 January 2024		506,165,200	65,925,126	287,483,949	400,331,495	1,259,905,770
Profit for the year		-	-	-	270,221,847	270,221,847
<i>Other comprehensive income, net of tax</i>		-	-	-	-	-
Total comprehensive income	26	-	-	-	270,221,847	270,221,847
Transfer to legal reserves	26	-	15,910,522	-	-15,910,522	-
Distribution of profit to reserves	26	-	-	-	-	-
Dividends distributed	26	-	-	-	-100,000,000	-100,000,000
Increase of share capital	26	50,006,000	-	-50,006,000	-	-
Total distributions and contributions		50,006,000	15,910,522	-50,006,000	156,007,728	171,918,247
Balance at 31 December 2024		556,171,200	81,835,648	237,477,949	554,642,820	1,430,127,616
Balance at 1 January 2025		556,171,200	81,835,648	237,477,949	554,642,820	1,430,127,616
Profit for the year		-	-	-	324,048,123	324,048,123
<i>Other comprehensive income, net of tax</i>		-	-	-	-	-
Total comprehensive income	26	-	-	-	324,048,123	324,048,123
Transfer to legal reserves	26	-	18,993,126	-	-18,993,126	-
Distribution of profit to reserves	26	-	-	-	-	-
Dividends distributed	26	-	-	-	-	-
Share capital increase	26	-	-	-	-	-
Total distributions and contributions		-	18,993,126	-	305,054,996	324,048,123
Balance as at 31 December 2025		556,171,200	100,828,774	237,477,949	859,697,816	1,754,175,739

The financial statements were approved by the Board of Directors on 21 April 2026:


Lucian Claudiu Anghel,
Deputy General Manager


Melinda Cepi,
Head of Finance Division

The accompanying notes form an integral part of these standalone and separate financial statements.

STANDALONE AND SEPARATE STATEMENT OF CASH FLOWS

<i>In RON</i>	Note	Standalone 2025	Standalone 2024	Separate 2025	Separate 2024
Cash flows from operating activities:					
Net profit		326,050,864	271,918,247	324,048,123	270,221,847
Adjustments for non-cash items:					
Depreciation and amortisation expense	10	20,187,146	19,032,650	20,187,146	19,059,171
Loss on disposal of intangible assets and fixed assets		3,151	2,780	3,151	2,780
Net loss from sale of repossessed assets	10		-467,335		-467,335
(Income)/ net expenses from provisions	10	5,303,179	5,889,413	5,303,179	5,889,413
Net loss from the measurement of financial instruments at fair value through profit or loss		-2,315,217	-3,278,965	-2,315,217	-3,278,965
Net (income)/ expenses from impairment of financial instruments	11	51,606,760	112,285,799	51,606,760	112,285,799
Dividends	9	-1,881,698	-1,456,207	-1,881,698	-1,456,207
Interest expense	6	303,623,095	296,533,618	303,623,095	296,533,618
Interest income calculated using the effective interest method	6	-969,863,471	-914,795,542	-969,863,471	-843,315,442
Share of (gain)/ loss from associates	12	-2,000,744	-1,696,400		-
Income tax expense	12	55,814,406	47,988,593	55,814,406	47,988,593
Other adjustments		4,739,045	273,709	4,739,045	273,709
Total adjustments		-534,786,345	-439,661,366	-532,783,604	-437,964,966
Changes in:					
(Increase)/ decrease in other assets		-31,560,214	-7,314,269	-31,560,214	7,314,269
Increase/ (decrease) in other liabilities		8,021,871	9,459,562	8,021,871	9,459,562
Increase/ (decrease) in deposits from customers		844,958,065	1,368,306,478	844,958,065	1,368,306,478
Increase/ (decrease) in deposits from other banks		69,598	-48,162,801	69,598	-48,162,801
(Increase)/ decrease in loans and advances granted to customers		-1.120.671.920	- 708,822,190	-1.250.671.920	- 708,822,190
Total changes		-435,133,700	613,466,779	-429.182.600	613,466,779
Tax paid		-46,566,570	-61,327,362	-46,566,570	-61,327,362
Assignment of contracts			5,336,294		5,336,294
Interest paid		-283,958,614	-280,004,144	-283,958,614	-280,004,144
Interest received		824.284.958	790,769,274	824.284.958	790,769,274
Net cash used in operating activities		-144.158.307	900,497,721	-144.158.307	900,497,721

The accompanying notes form an integral part of these standalone and separate financial statements.

STANDALONE AND SEPARATE STATEMENT OF CASH FLOWS

		Standalone		Separate	
In RON	Note	2025	2024	2025	2024
Net cash from investing activities:					
Purchases of intangible assets	18	-653,627	-1,018,874	-653,627	-1,018,874
Purchases of tangible assets	18	-4,197,453	-3,296,459	-4,197,453	-3,296,459
Sales of tangible assets		382,344	218,162	382,344	218,162
Acquisitions of interests in associates		-	-	-	-
Purchases of securities		-949,972,226	-525,098,422	-949,972,226	-525,098,422
Sales of securities		582,731,550	272,857,755	582,731,550	272,857,755
Dividends received	9	1,881,698	1,456,207	1,881,698	1,456,207
Sales of assets held for sale	10	381,000	467,335	381,000	467,335
Interest received from securities		125,140,567	101,851,729	125,140,567	101,851,729
Net cash used in investing activities		-244,005,148	-152,562,566	-244,005,148	-152,562,566
Cash flows from financing activities:					
Proceeds from subordinated loan	13 (iii)		34,818,700		34,818,700
Payments of subordinated loan	13 (iii)	-5,849,298	-4,005,662	-5,849,298	-4,005,662
Proceeds from issued bonds	13 (iii)	-	-	-	-
Payments related to issued bonds	13 (iii)	-11,295,558	-11,050,515	-11,295,558	-11,050,515
Proceeds from loans from financial institutions	13 (iii)	5,098,500	-	5,098,500	-
Repayments of loans from financial institutions	13 (iii)	-3,496,135	-3,610,006	-3,496,135	-3,610,006
Lease payments	13 (iii)	-19,510,065	-17,643,475	-19,510,065	-17,643,475
Dividends paid	26		-100,026,200		-100,026,250
Net cash from financing activities		-35,052,557	-101,517,208	-35,052,557	-101,517,208
Net increase/(decrease) in cash and cash equivalents		-423,517,010	646,417,948	-423,517,010	646,417,948
Cash and cash equivalents on 1 January	13 (ii)	3,357,255,561	2,710,837,612	3,357,255,561	2,710,837,612
Effect of foreign exchange rate fluctuations on cash and cash equivalents		-	-	-	-
Cash and cash equivalents on 31 December	13 (ii)	2,934,073,382	3,357,255,561	2,934,073,382	3,357,255,561

The financial statements were approved by the Board of Directors on 21 April 2026:


 Lucian Claudiu Anghel,
 Deputy General Manager


 Melinda Cepi,
 Head of Finance Division

1. REPORTING ENTITY

Libra Internet Bank SA ("the Bank") was incorporated in Romania in 1996 and is authorized by the National Bank of Romania to conduct all commercial banking activities.

Individual financial statements (equity accounting)

In 2020, the Bank participated in the establishment of an associate entity, namely LIBRA DEVELOPMENT I.F.N. SA; The associate's object of activity is lending, and the Bank holds 49% of its share capital as at 31 December 2025.

The Bank's corporate banking activities consists of: taking deposits, cards, cash management and lending. The Bank offers standard banking services, as well as products related to foreign trade transactions, including payment orders, the issuance of letters of credit and guarantees. Furthermore, the Bank provides individual customers with a full range of banking services, which include current and term deposits, loans, domestic and international transfers and payment orders, cards, electronic payments.

Given that the Bank's operations involve different risks and returns and taking into account the regulatory environment, the nature of the services provided, business processes, customer typology and the methods used to provide the services, the Bank carries out its activity through five business segments of activity. All its activities are carried out exclusively in Romania. Segment reporting for its business segments: Individuals, Small companies, Large companies, Treasury and others and GM (General Management) is presented in Note 30.

The Bank operates through its head office located in Bucharest and through its network of 59 branches.

The Bank is managed by an Executive Committee, consisting of 4 members, and by a Board of Directors made up of 8 members, 4 non-executive and 4 executive members.

The Bank's registered office is located at Vitan Road, no. 6-6A, Phoenix Tower, Bucharest, Romania.

2. BASIS OF PREPARATION

(a) Statement of compliance

The individual financial statements of the Bank and its associate have been prepared in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union (EU).

The separate financial statements of the Bank have been prepared in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union (EU).

(b) Functional and presentation currency

The accounts of the Bank and its associate are kept in RON, which is the Bank's functional currency in accordance with Romanian accounting legislation and the banking regulations of the National Bank of Romania. The financial statements are presented in Romanian RON, rounded to the nearest "RON".

(c) Basis of measurement

The individual and separate financial statements of the Bank are prepared on the historical cost basis, except for financial assets classified at fair value through profit or loss. Other financial assets and liabilities and non-financial assets and liabilities are measured at amortized cost or, in the case of assets held for sale, at the lower of carrying amount and fair value less costs to sell.

2. BASIS OF PREPARATION (CONTINUED)**(d) Use of estimates and judgements**

The preparation of the individual and separate financial statements in accordance with IFRS, as adopted by the European Union, requires management to make judgements, estimates and assumptions that affect the application of policies and the reported amounts of assets and liabilities, income and expenses. The related estimates and assumptions are based on historical experience and various other factors that are considered reasonable under the circumstances, the results of which form the basis for making judgements about the carrying amounts of assets and liabilities that are not readily apparent from other sources. Actual results may differ from these estimates.

The underlying estimates and assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

A. Judgements

Information about the judgements made in applying the accounting policies that have the most significant effects on the amounts recognised in the financial statements is included in the following notes:

— Note 3, II. (d)(vi): establishing the criteria for determining whether the credit risk of the financial asset has increased significantly since initial recognition, determining the methodology for incorporating forward-looking information into the measurement of ECL and selecting and approving the models used for measuring ECL and assessing post-model adjustments.

— Note 3, II (d)(ii): classification of financial assets: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the financial asset are SPPI on the outstanding principal amount.

B. Assumptions and estimation uncertainties

Information about assumptions and estimation uncertainties that present a significant risk of leading to a material adjustment in the year ended 31 December 2025 is included in the following notes:

— Notes 3, II.(d)(vi), 4 (a) and 5: impairment of financial instruments: determining the inputs into the ECL measurement model, including the key assumptions used in estimating recoverable cash flows and incorporating forward-looking information, all in the context of recent adverse economic developments arising from increases in energy prices and inflationary pressures and disruptions in the global supply chain.

— Note 5 and 28: measurement of the fair value of financial instruments with significant unobservable inputs.

3. MATERIAL ACCOUNTING POLICIES

These accounting policies adopted and applied by the Bank, as set out below, have been applied consistently to all periods presented in these individual and separate financial statements, unless otherwise stated.

The Bank adopted the presentation of accounting policies (Amendments to IAS 1 and IFRS Practice Statement 2) starting from 1 January 2024. The amendments require the presentation of “material” accounting policies (Eng. “material” rather than “significant”).

Changes in material accounting policies

With effect from 1 January 2023, the Bank adopted the Amendments to IAS 1 and IFRS Practice Statement 2.

Although the amendments did not result in changes to the accounting policies, they had an impact on the information on accounting policies presented in the financial statements.

The amendments require the disclosure of “material” accounting policies (Eng. “material” rather than “significant”). Moreover, they provide guidance on the concept of materiality in the presentation of accounting policies and guide entities in providing useful information on the specific accounting policies that users need to understand other information presented in the financial statements.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

The Bank has reviewed the accounting policies and updated the information presented in Note 3 Material accounting policies in certain instances in line with the amendments.

I. Investments in associates**Standalone financial statements (equity accounting)**

In 2020, the Bank participated in the establishment of an associate entity, namely LIBRA DEVELOPMENT I.F.N. SA. The associate's object of activity is lending, and the Bank holds 49% of its share capital as at 31 December 2025. Libra Development I.F.N. It began its activity on 14 July 2020.

The associate entity, is the entity in which the Bank exercises significant influence over the financial and operating decision-making process, but without controlling the entity. The investment of the Bank in the associate entity is accounted for using the equity method of accounting. Significant influence is determined by the percentage of ownership of 49% with which the voting rights are exercised and by the impact of potential rights that are currently exercisable or convertible.

At present the Bank exercises its significant influence also through the presence of a member in the Board of Directors.

In accordance with the equity method, the separate financial statements include a share of the Bank's result in the associate, from the date on which the Bank began to exercise influence significant influence and until the date on which such influence ceases.

The Bank recognizes its share of the profit or loss of the associate, including any impairment losses recognized by the associate.

Thus, the Bank performs the limited "consolidation" and fair value adjustments required by IAS 28 for eliminating unrealised gains and adjusts depreciation and impairment losses when the fair value of the associate is higher or lower than the carrying amount in the associate's own financial statements.

The resulting carrying amount of the investment is then tested for impairment as a whole.

Goodwill arising on the acquisition of the associate is included in the carrying amount of investments. Since goodwill is not reported separately, it is not tested for impairment. In fact, the entire investment accounted for using the equity method is tested for impairment at the end of the reporting period and whenever there is an indication of impairment.

II. Accounting policies**Separate financial statements (cost accounting)**

In the separate financial statements, the Bank has elected to measure the investment in associates at cost and to test it for impairment whenever there is an indication of impairment. At 31,12,2025 and at 31,12,2024 there were no indications of impairment.

a) Foreign currency

Transactions denominated in foreign currency are converted into RON at the exchange rate valid at the transaction date. Monetary assets and liabilities denominated in foreign currency at the statement of financial position date are reconverted into the functional currency at the closing exchange rate at period end. Foreign exchange differences arising from the settlement of transactions denominated in foreign currency are included in the statement of income and expenses at the settlement date using the exchange rate valid on that date. Monetary assets and liabilities arising from foreign currency transactions are stated in RON at the balance sheet date.

The exchange rates of the main foreign currencies were as follows:

Currencies	31 December 2025	31 December 2024	%
Euro (euro)	1: RON 5.0985	1: RON 4.9741	2.501%
US dollar (US dollar)	1: RON 4.3417	1: RON 4.7768	-9.109%

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

a) Foreign currency (continued)

Unrealised gains / (losses) arising from the translation of monetary assets and liabilities and realised gains / losses from foreign currency transactions are reported in the profit or loss account under the line "Net gains from foreign exchange transactions and revaluation".

Non-monetary assets and liabilities that are measured in terms of historical cost in foreign currency are translated into the functional currency using the exchange rate at the transaction date. Non-monetary assets and liabilities denominated in foreign currency that are stated at fair value are translated into the functional currency at the exchange rate valid at the date on which the fair value is determined.

b) Interest income and expense

Fee and commission income and expense are an integral part of the effective interest rate of a financial asset or a financial liability and are included in the calculation of the effective interest rate.

Income from charges, commissions and other operating income are recognized in the profit or loss account as the Bank satisfies the obligation performance embedded in the contract, in accordance with the rules of "IFRS 15 Revenue from Contracts with Customers". In particular:

- If the obligation of performance is satisfied at a specific point in time ("point in time"), the related revenues are recognized in the profit or loss account when the service is provided;
- If the obligation of performance is satisfied in time, the related revenues are recognized in the profit or loss account so as to reflect the progress in satisfying such an obligation.

The Bank provides banking services to retail customers and companies, including the administration of accounts, the provision of overdraft facilities, transactions in foreign currency, credit cards and services rendered on behalf of customers in return for a fee. Fees for the administration of the current account are calculated monthly and charged to the client's account. Transaction-based fees for transactions for exchanges, transactions in foreign currency and overdrafts are charged to the client's account when the transaction occurs. Fees for services rendered in the name of customers are charged monthly and are based on fixed tariffs reviewed annually by the Bank. Income from service fees and services provided on behalf of customers are recognized over time as they are provided. The revenues related to transactions are recognized at the time when the transaction takes place. The investment banking segment of the Bank offers various services related to finance, including administration services for loans and agency services, the administration of a syndicate of loans, the execution of transactions of clients in exchanges and underwriting of securities. However, if a client terminates the contract before 31 December, then upon termination the fee for the services rendered up to date is charged. Transaction-based fees for the administration of a loan syndication, the execution of transactions and the underwriting of securities are charged over the term of the transaction, in accordance with the terms of the facility agreement.

In the case where in which the schedule of collections is not aligned with the manner in which it is fulfilled the performance obligation, the Bank recognizes a contract asset or a contract liability for the portion of revenues accrued in the period or to defer them to subsequent periods.

The amount of income related to fee income and other operating income is measured based on the contractual provisions. If the amount stipulated in the contract is subject, in whole or in part, to variability, revenue must be recognised based on the most probable amounts that the Bank expects to receive. Such an amount is determined on the basis of all facts and circumstances considered relevant for the assessment, which depend on the type of service provided and, in particular, on the assumption that it is not highly probable that the revenue recognised will not be significantly reversed. Note, however, that for the services provided by the Bank such variability is usually not envisaged.

"Accrued income" includes the contract assets recognised in accordance with IFRS 15, In this context, accrued income represents the portion of the performance obligation already satisfied through services provided by the Bank and which will be settled in future periods in accordance with the contractual provisions.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

b) Interest income and expense (continued)

“Deferred income” includes the contract liabilities recognised in accordance with IFRS 15, Deferred income represents the portion of the performance obligations that have not yet been fulfilled through the services provided by the Bank, but which have already been settled in the respective period or in prior periods. Most of this amount relates to the performance obligations that are expected to be fulfilled by the reporting date up to the end of the reporting year following.

c) Fee and commission income and expense

Fee and commission income and expenses include fees other than those that form an integral part of the EIR (see above). The fees included in this part of the Bank’s statement of income and expenses include:

- commissions relating to clients’ means of payment such as cheques, cards, promissory notes, etc.), interbank transactions (commissions on transactions in the account);
- collections and payments (current accounts, business banking, others);
- loan commitments and letters of guarantee issued;
- commissions related to lending activity that are not an integral part of the EIR, such as commitment non-utilisation fees or early repayment fees on loans, or commissions that do not result in the granting of the loan.

If the performance obligation is satisfied at a specific moment in time (“point in time”), the related revenue is recognised in the profit or loss account when the service is rendered.

In the event that in which the obligation of performance is fulfilled in time, the related income is recognized in the statement of profit and loss in order to reflect the progress of fulfilling such an obligation.

Fees for account management are charged in the customer's account monthly and are based on fixed rates periodically revised by the Bank. Fees based on transactions (exchange, transactions in foreign currency and overdrafts) are collected in the customer's account in the moment in which the transaction takes place.

d) Financial assets and liabilities

i. Recognition and initial measurement

Financial assets and financial liabilities recorded in the balance sheet include cash and cash equivalents, debt and equity securities, loans to customers, trade and other accounts receivable and payable, long-term loans, deposits, bonds issued and investments. The accounting principles for these items are disclosed in the respective accounting policies. The Bank recognizes financial assets and financial liabilities in its statement of financial position only when it becomes a party to the contractual provisions of the instrument (e.g. at the date of settlement and/or at the date of purchase).

The Bank initially recognizes loans and advances, deposits, bonds issued and borrowings received at fair value, on the date on which they are originated. Regular transactions with liabilities and equity instruments are accounted for at the date of transfer (settlement date). All other financial assets and liabilities are initially recognized on the trade date on which the Bank becomes a party to the contractual provisions of the instrument, at fair value minus transaction costs that can be directly attributed to the acquisition or issue.

When a financial asset or a financial liability is initially recognized, the Bank measures it at its fair value plus or minus, in the case of a financial asset or a financial liability, not at fair value through profit or loss, the transaction costs that can be directly attributed to the acquisition or issue of a financial asset or a financial liability.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

d) Financial assets and liabilities (continued)

ii. Classification

At initial recognition, a financial asset is classified as being measured at amortised cost, at fair value through other comprehensive income ("FVOCI") or at fair value through profit or loss ("FVTPL") based on the following two criteria:

- The Bank's business model for managing the financial asset and
- Their characteristics with regard to the contractual cash flows (hereinafter referred to as the "SPPI test").

A financial asset is measured at amortised cost if the following two conditions are met and it is not designated as at FVTPL :

(a) The asset is held within a business model whose objective is to hold the financial asset in order to collect contractual cash flows; and

(b) The contractual terms of the financial asset give rise, on specified dates, to cash flows that are solely payments of principal and interest on the outstanding principal amount.

A debt instrument is measured at FVOCI only if it meets both of the following conditions and is not designated at FVTPL:

- a) a) the asset is held within a business model whose objective is achieved both by collecting contractual cash flows and by selling the financial asset; and
- b) b) the contractual terms of the financial asset give rise, on specified dates, to cash flows that are solely payments of principal and interest on the principal amount outstanding.

At initial recognition of an investment in equity instruments that is not held for trading, the Bank may irrevocably elect to present subsequent changes in fair value in OCI. This choice is made for each investment. All other financial assets are classified as measured at FVTPL.

Business model

The business model reflects how the Bank manages a group of assets in order to generate cash flows and determines whether the cash flows will result from collecting contractual cash flows, from sales, or from both. Accordingly, the Bank has identified the following business model:

- Held to collect;
- Held to collect and sell;
- Other business models.

In order to classify a financial asset in the "held to collect" model, the Bank will have to assess whether sales are compatible with this category:

- a) there is no limitation on sales due to an increase in credit risk. Sales close to maturity are permitted if certain criteria are met.
- b) for all other sales, the Bank will have to assess whether these sales are significant in value and their level of frequency.

As part of this assessment of sales, the Bank has established the following policy criteria and thresholds:

- When there has been an increase in credit risk;
- When sales are considered to be close to maturity;
- When sales are considered significant for loans and bonds;
- When sales are considered frequent.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

d) Financial assets and liabilities (continued)

Assessment of whether contractual cash flows are solely payments of principal and interest (SPPI test)

With regard to the initial recognition of a financial instrument, the Bank assesses whether the cash flows represent solely payment of Principal and Interest (SPPI), which compensate for the time value of money, credit risk and other basic lending risks (for example liquidity risk, administrative costs and a reasonable profit margin). Characteristics of cash flows that are not related to the main lending activity will, most likely, not pass the test. All loans and debt instruments that do not meet the SPPI criteria are measured at fair value through profit or loss (FVTPL).

The Bank classifies financial liabilities, other than financial guarantees and loan commitments, at amortised cost (AC) or at fair value through profit or loss (FVTPL).

Reclassifications

Reclassifications between measurement categories will be allowed only when the Bank changes its business model for a group of assets. Such changes are expected to be very rare.

Financial liabilities

The Bank has classified its financial liabilities as measured at amortised cost (i.e. Deposits from banks, Deposits from customers, Loans).

iii. Derecognition

The Bank derecognises a financial asset when:

- the contractual rights to receive cash flows from that financial asset expire or
 - it transfers the financial asset, and the transfer cumulatively meets the follow conditions:
1. it transfers the contractual rights to receive cash flows from the financial asset or
 2. it retains the contractual rights to receive cash flows from the financial asset, but assumes a contractual obligation to pay the cash flows to one or more recipients under a contract that meets the following conditions:
 - ✓ the Bank has no obligation to pay amounts to the potential beneficiaries unless the Bank collects equivalent amounts from the transferred asset;
 - ✓ under the terms of the asset transfer contract, the Bank is prohibited from selling or pledging the original asset for reasons other than to secure the obligation to pay cash flows to the potential beneficiaries, in circumstances where the Bank collects equivalent amounts from the transferred asset;
 - ✓ the Bank transfers any cash flows it collects on behalf of the beneficiaries without significant delay.

The Bank will derecognise a financial liability when it is extinguished - e.g. when the obligation specified in the contract has been fulfilled, cancelled or has expired.

Financial assets and liabilities are offset, and the net amount is recognised in the Statement of financial position only when the Bank has a legally enforceable right to set off the recognised amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted by the accounting standards or in the case of gains and losses arising from a group of similar transactions.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

d) Financial assets and liabilities (continued)

iv. Offsetting

Financial assets and liabilities are offset, and the net amount is recognised in the Statement of financial position only when the Bank has a legally enforceable right to set off the recognised amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted by the accounting standards, or for gains and losses arising from a group of similar transactions.

v. Fair value measurement

Fair value represents the price that would be received to sell an asset or to transfer a liability in an orderly transaction between participants in the market that is the principal market, or in the absence of such a market, the most advantageous market to which the Bank has access at the measurement date.

When available, the Bank measures the fair value of an instrument using the quoted price in an active market for that instrument. A market is considered active if transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information in a continuous manner.

If there is no quoted price in an active market, then the Bank uses valuation techniques that maximize the use of relevant observable inputs and minimize the use of unobservable inputs. The valuation chosen includes all the factors that market participants would take into account when determining the price of a transaction.

The best evidence of the fair value of a financial instrument at initial recognition is, normally the price of the transaction, that is fair value of the consideration given or received. If the Bank determines that the fair value at initial recognition differs from the transaction price, and the fair value is not evidenced either by a quoted price in an active market for an identical asset or liability, or on the basis of a valuation technique that uses only data from observable markets, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, this difference is recognized in profit or loss on an appropriate basis over the life of the instrument, but no later than the point at which the measurement is fully supported by observable market data or the transaction is closed.

The Bank holds financial assets at amortized cost ("AC") in the form of loans and advances to customers, loans and advances to banks and debt instruments. For financial assets measured at AC, the expected impairment loss reduces the gross carrying amount and is recognized in profit or loss.

vi. Impairment

The Bank uses the three-stage expected credit loss (ECL) approach, which reflects changes in credit quality since initial recognition.

1. Stage I includes instruments that have not deteriorated significantly in terms of credit quality since initial recognition or instruments with low credit risk;
2. Stage II includes financial instruments that have deteriorated significantly in respect of the quality of the credit from recognition initial, but for which no exists evidence objective regarding an event of impairment;
3. Stage III includes financial assets that have objective evidence of impairment at the reporting date.

The expected credit loss for financial assets in Stage 1 is measured at an amount equal to the portion of the expected credit losses that results from possible events in the next 12 months.

Instruments in Stages 2 or 3 have expected credit losses over the entire lifetime.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)**II. Accounting policies (continued)****d) Financial assets and liabilities (continued)****vi. Impairment (continued)**

The Bank recognises expected credit losses at an amount equal to lifetime ECLs, except for the following, for which the amount recognised will be 12-month ECL:

- Debt investment securities for which it has been determined that the credit risk is low at the reporting date. The Bank considers that a debt security has low credit risk when its credit risk assessment is equivalent with the definition understood globally of "investment-grade".
- Other financial instruments for which the credit risk has not increased significantly since initial recognition.

The assessment of impairment requires judgments, estimates and assumptions of management, in the following areas, which are discussed in more detail below:

- Estimating the future cash flows expected from loans and advances classified in Stage III and the probability of reasonable scenarios;
- Assessing whether the credit risk of an instrument has increased significantly since initial recognition; and including macroeconomic forecast information in the measurement of ECLs.

Measurement of ECLs

Expected credit losses are the difference between the total contractual cash flows due to the Bank and the total cash flows that the Bank expects to receive (i.e. the total amounts that will not be collected), discounted at the effective interest rate at the time of calculation. For undrawn credit commitments (revocable and irrevocable) and guarantees that are not financial, the credit loss is the present value of the difference between the contractual cash flows due to the Bank (estimated using a CCF conversion factor representing a modelled assumption, meaning a proportion of any undrawn exposure that is expected to be used before the occurrence of the default event) and the cash flows that the Bank expects to receive in the event that the credit is drawn.

To measure the expected credit loss, the Bank estimates future cash flows, taking into account all the terms and conditions of the financial instrument (for example, maturity, early repayment and similar options) over the entire estimated life, including the cash flows expected from guarantees.

Expected credit losses are an estimate of loan losses (i.e. the present value of the total cash shortfall) over the estimated life of a financial instrument, based on a value weighted by probabilities of occurrence.

Expected credit losses are determined separately for exposures analysed individually and for exposures analysed collectively.

The analysis of individual credit exposures in the ECL calculation process is applied to the following groups of exposures *Significant individual exposures*

1. exposures in Stage 3 of the following categories:

- individually significant exposures – over 1% of own funds;
- exposures of debtors in insolvency, bankruptcy or another status following bankruptcy;
- the exposures of customers with arrears older than 180 days without collateral eligible in the calculation of collective provisions;
- assets that record a debt service of more than 360 days and for which no initiated legal proceedings;
- exposures identified on an individual basis through internal decisions or NBR orders;
- non-performing restructured exposures;
- all exposures exposed to the risk of the exercise of the option granted by law to the debtor to give in payment the mortgaged property.

2. exposures in stage 1 or 2 identified on an individual basis through internal decisions or NBR orders:

- the criteria considered for establishing the individual analysis within the monitoring process refer to the default history, the reasons for inclusion in the watchlist, other identified risk elements.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

d) Financial assets and liabilities (continued)

vi. Impairment (continued)

Collective assessment

In accordance with IFRS 9, customers are allocated in accordance with the associated risk, as follows:

Stage 1 - Customers with debt service of less than 30 days and without information regarding an increase in credit risk;

Stage 2 - Customers with increased credit risk identified by the following:

- The SICR criterion – significant increase of credit risk compared to the time of origination by comparing the current PD with the origination PD;
- Debt service of more than 30 days;
- Debtors restructured during the probation period;
- Customers on the watchlist.

Stage 3 - Customers in default status, identified by the criteria set out in the Procedure regarding non-performing exposures ("Procedure").

Default status

The Bank uses the following definition of default status, as described in the Procedure:

- Debt service of more than 90 days corresponding to exposures above the materiality thresholds of 1% of total exposure and 150 RON for retail exposures and 1,000 RON for corporate exposures;
- Indicators regarding the improbability of payment, identified on the basis of customer monitoring analyses;
- Legal proceedings have been initiated against the debtor to recover the arrears;
- Debtors in bankruptcy, insolvency, preventive composition and similar status;
- Borrowers who have benefited from restructuring operations due to financial difficulties and are classified as non-performing restructuring.

The Bank applies the contagion principle: if a client has exposures in default status, all the other exposures of that client will be considered to be in default status.

POCI exposures (impaired at purchase or origination)

Credit exposures classified as impaired at acquisition or at origination (POCI) are those exposures that show evidence of impairment either at the time of acquisition or at the time of origination, where the exposure results from a restructuring process of another exposure that was impaired.

Significant increase in credit risk

When determining whether the credit risk (i.e. the risk of default) of a financial instrument has increased significantly since initial recognition, the Bank considers reasonable and supportable information that is relevant and available without undue cost or effort, including quantitative and qualitative information and analyses based on the Bank's historical experience, expert assessment and forward-looking information.

The Bank has established a framework that includes both quantitative and qualitative information in order to determine whether the credit risk for a certain financial instrument has increased significantly since initial recognition. The framework is aligned with the Bank's internal credit risk management process.

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3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

d) Financial assets and liabilities (continued)

vi. Impairment (continued)

The Bank monitors the effectiveness of the criteria used to identify significant increases in credit risk through periodic analyses in order to confirm this :

- The criteria are able to identify significant increases in credit risk before the exposure is in a state of default ;
- The criteria do not coincide with the same point in time at which an asset becomes 30 days past due;
- The average time between the identification of a significant increase in credit risk and non-payment appears reasonable;
- Exposures are generally not transferred directly from 12-month ECL measurement to credit-impaired
- There is no unwarranted volatility in the impairment allowance on transfers between 12-month ECL and lifetime ECL measurements.

The Bank primarily identifies whether a significant increase in credit risk has occurred since initial recognition based on information held by the Bank that allows a realistic assessment of the customer's repayment capacity. Relevant data are also considered regarding the development of the market value of the collateral securing the obligation, changes in the quality of the guarantors' collateral, changes in the payment status of group debtors, etc.

The Bank may determine that an exposure has experienced a significant increase in credit risk if certain qualitative factors indicate this and these indicators cannot be fully captured in a timely manner by the quantitative analysis.

The criteria for determining whether credit risk has increased significantly vary by portfolio and include a delinquency-based backstop. As a backstop, the Bank considers that a significant increase in credit risk occurs when an asset is more than 30 days past due. The Bank determines the days past due by counting the number of days from the earliest due date for which full payment has not been received.

vii. Modification of the financial asset

If the terms of a financial asset are modified, the Bank assesses whether the cash flows of the modified asset are substantially different. If the cash flows are substantially different, then the contractual rights to the original financial asset are considered to have expired. In this case, the original financial asset is derecognised (see 3 d) *iii*) and a new financial asset is recognised at fair value, plus any eligible transaction costs. Any fees received as part of the modification are accounted for as follows:

- Fees that are taken into account in determining the fair value of the new asset and fees that represent reimbursement of eligible transaction costs are included in the initial measurement of the asset; and
- Other fees are included in profit or loss as part of the gain or loss on derecognition.

If cash flows are modified as a result of financial difficulties, the objective of the modification is to maximise recovery of the original contractual terms rather than to create an asset with substantially different terms. If the Bank intends to modify an asset in a way that would lead to forgiveness of cash flows, it first considers whether a portion of the asset should be written off before the modification takes place (see the write-off policy below). In these cases, the derecognition criteria are not met, but the assessment is taken into account in measuring expected credit losses.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

d) Financial assets and liabilities (continued)

viii. Write-off policy

Loans and debt securities are written off (partially or in full) when there are no reasonable expectations of recovering a financial asset in whole or in part. This is generally the case when the Bank determines that the borrower has no assets or sources of income that could generate cash flows sufficient to repay the amounts subject to write-off. This assessment is performed at the level of the individual asset. Recoveries of amounts written off are included in "Losses on impairment of financial instruments" in the statement of profit or loss. Financial assets written off remain subject to enforcement activities in order to comply with the Bank's procedures for recovering amounts due.

In the course of enforcement procedures for exposures in default, the Bank may take possession of the collateral underlying the impaired exposure and settle the debt. Foreclosed collateral is recognised at fair value and then measured in accordance with its classification. The Bank has classified foreclosed collateral as "assets held for sale".

ix. Taking possession of collateral

An asset is considered to be held for sale if the following conditions are met: the value of the asset is recovered through sale and not through its continued use, the asset must be available for immediate sale, and the sale of the asset must be probable. The probability of sale is supported by a sales plan at Bank management level and by the active involvement of the Bank in identifying a buyer. Measurement of an asset classified as held for sale takes into account the lower of its carrying amount and fair value, less costs to sell.

e) Cash and cash equivalents

Cash and cash equivalents include cash in hand, balances held with central banks and highly liquid financial assets with original maturities of less than three months that are subject to an insignificant risk of changes in fair value and are used by the Bank in managing its short-term commitments. Cash and cash equivalents are accounted for at amortised cost in the statement of financial position. For the purpose of the statement of cash flows, the minimum compulsory reserve placed with the National Bank of Romania is not included as a cash equivalent due to restrictions on its availability.

f) Loans and advances

Loans and advances in the statement of financial position include loans and advances measured at amortised cost; they are initially measured at fair value plus incremental direct transaction costs and subsequently at amortised cost using the effective interest method.

g) Investment securities

The "investment securities" line in the statement of financial position includes:

- Debt securities measured at amortised cost; these are initially measured at fair value plus incremental direct transaction costs and subsequently at amortised cost using the effective interest method;

Equity instruments measured at FVTPL; they are at fair value, with changes recognised immediately in profit or loss;

h) Tangible and intangible assets

Tangible and intangible assets are recognised at their historical cost less accumulated depreciation and impairment.

The Bank recognises in the carrying amount of a tangible asset the cost of replacing part of it when the cost is incurred, provided that future economic benefits will be obtained by the Bank and the cost of the replacement can be measured reliably. All other expenditures are recognised in the statement of profit or loss as an expense incurred.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)**II. Accounting policies (continued)****h) Property, plant and equipment and intangible assets (continued)**

Depreciation and amortization expenses are recognized on a straight-line basis over the estimated useful life of each item in the category of property, plant and equipment and intangible assets, as follows:

Buildings	2%
Equipment, fittings and fixtures	5 - 20%
Vehicles	20%
Other	6.67%-3.34%
Software	33.33%

The depreciation methods and useful lives are reassessed at each reporting date.

Gains and/or losses from derecognition of property, plant and equipment and intangible assets are determined as the difference between income from sales of property, plant and equipment and the expenses with their disposal and/or retirement and are recognized in profit or loss during the year (within other operating income or expenses).

i) Impairment of non-financial assets

The carrying amounts of the Bank's assets, other than deferred tax, are reviewed at each reporting date to determine whether there is any indication of impairment. If any such indication exists, then the recoverable amount of the asset is estimated.

An impairment loss is recognized if the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. A cash-generating unit is the smallest identifiable group of assets that generates cash flows that are largely independent from other asset groups. Impairment losses are recognized in profit or loss. Impairment losses recognized for cash-generating units are allocated first to reduce the carrying amount of any goodwill allocated to the units and then to reduce the carrying amount of the other assets in the unit (group of units) on a pro rata basis.

The recoverable amount of an asset or a cash-generating unit is the higher of its value in use and its fair value less costs to sell. In measuring value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. With respect to other assets, impairment losses recognized in prior periods are assessed at each reporting date for any indication that the loss has decreased or no longer exists.

An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the carrying amount of the asset does not exceed the carrying amount that would have been determined, net of depreciation or amortization, if no impairment loss had been recognized.

j) Leases

At the inception of a contract, the Bank assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Bank uses the definition of a lease in IFRS 16.

This policy applies to contracts entered into (or modified) on or after 1 January 2019.

The Bank acting as lessee

At the inception or modification of a contract that contains a lease component, the Bank allocates the contractual consideration to each lease component on the basis of its individual price.

For the leasing of premises for branches and offices, the Bank has elected to separate components that are not in the nature of lease payments and to account for them in other operating income.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

j) Leases (continued)

The Bank recognizes a right-of-use asset and a lease liability at the commencement date of the lease.

The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove any improvements made to branches or office premises.

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the end of the lease term. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability. The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Bank's incremental borrowing rate. In general, the Bank uses its incremental borrowing rate as the discount rate.

The Bank determines its incremental borrowing rate by analysing its borrowings from various external sources and makes certain adjustments to reflect the lease conditions and the type of asset leased.

The lease payments included in the measurement of the lease liability comprise the following:

- fixed payments, including in-substance fixed payments;
- variable lease payments that depend on an index or a rate, initially measured using the index or rate at the commencement date;
- sums expected to be paid under a residual value guarantee; and
- the exercise price under a purchase option that the Bank is reasonably certain to exercise, lease payments in an optional renewal period if the Bank is reasonably certain to exercise an extension option, and penalties for early termination of a lease, unless the Bank is certain that it will not terminate the lease early.

The lease liability is measured at amortized cost using the effective interest method. It is remeasured when there is a change in future lease payments resulting from a change in an index or a rate, if there is a change in the Bank's estimate of the amount expected to be paid under a residual value guarantee, if the Bank changes its assessment of whether it will exercise a purchase, extension or termination option, or if there is a revised in-substance fixed lease payment.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset or is recognized in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero. The Bank presents the right-of-use asset within "Property, plant and equipment" and lease liabilities within "Other liabilities" in the statement of financial position.

Short-term leases and leases of low-value assets

The Bank has elected not to recognize right-of-use assets and lease liabilities for low-value leases and short-term leases, including IT equipment leases. The Bank recognizes the lease payments associated with these lease contracts as a straight-line expense over the lease term.

k) Deposits attracted from customers

Deposits taken from customers are initially measured at fair value plus transaction costs and subsequently measured at amortised cost using the effective interest method.

l) Issued bonds and borrowings from financial institutions

Borrowings, such as borrowings from banks and other financial institutions and bonds issued, are initially recognised at fair value, net of associated transaction costs. Borrowings from financial institutions are subsequently carried at amortised cost.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

m) Provisions

A provision is recognised in the statement of financial position when the Bank has a present legal or constructive obligation as a result of a past event, and it is probable that an outflow of economic benefits will be required to settle the obligation. If the effect is significant, provisions are measured by discounting the expected future cash flows using a rate before tax that reflects current market assessments of the time value of money and, if appropriate, the specific risks of the liability.

n) Financial guarantees and loan commitments

Financial guarantees are contracts that oblige the Bank to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make a payment when due in accordance with the terms of a debt instrument. Loan commitments are firm commitments to provide credit under pre-specified terms and conditions.

Financial guarantees issued or commitments to grant a loan at an interest rate below market are initially measured at fair value, and the initial fair value is amortised over the life of the guarantee or commitment. Subsequently, they are measured at the higher of this amortised amount and the loss allowance amount.

The Bank has not issued any loan commitment that is measured at FVTPL. Likewise, the Bank has not issued any loan commitment to provide loans at an interest rate below market.

For other loan commitments, the Bank recognises an impairment allowance in accordance with IFRS 9, see accounting policy 3, II.d) vi.

Liabilities arising from financial guarantees and loan commitments are included in provisions.

o) Employee benefits

Short-term employee benefits include wages, bonuses and contributions to social security. Short-term employee benefits are recognised as expenses as the services are rendered.

In the normal course of business, the Bank makes payments to Romanian state funds on behalf of its employees for pensions, healthcare and unemployment benefits. All of the Bank's employees are members.

p) Income tax

Income tax comprises current and deferred tax. Income tax is recognised in the statement of profit or loss except to the extent that it relates to items recognised directly in equity, in which case it is recognised in equity. Current tax is the tax payable on taxable profit for the current year, using tax rates enacted or substantively enacted at the date of the statement of financial position and any adjustment to tax payable in respect of prior periods.

Deferred tax is recognised using the balance sheet method, which recognises temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes. The amount of deferred tax recognised is based on the expected manner of recovery or settlement of the carrying amount of the assets and liabilities, using tax rates enacted or substantively enacted at the balance sheet date. A deferred income tax asset is recognised for unused tax losses, tax credits and deductible temporary differences only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised.

Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realised. Deferred tax assets and liabilities are offset only when they relate to the same taxable entity, are levied by the same taxation authority and when there is a legally enforceable right of set-off. The tax rate applicable in determining current and deferred income tax for the financial years ended 31 December 2025 and 2024 is 16%. Additional taxes related to dividends are recognised at the same time as the liability to pay the dividends is recorded.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)**II. Accounting policies (continued)****q) Segment Reporting**

The Bank presents segment-level information to enable users of the financial statements to evaluate the nature and financial effects of the business activities in which it engages and the economic environments in which it operates. An operating segment is a component of the Bank that engages in business activities from which it may earn revenues and incur expenses and for which discrete financial information is available. Segment reporting is based on the following business lines of the Bank: individuals, small companies (micro companies, professionals, agriculture), large companies (customers with turnover above 4 million euro), treasury and others and GM (other customers and other operations allocated to general management that are not allocated to specific segments).

r) New standards and amendments to existing standards issued by the IASB and adopted by the EU**A. Standards that became effective in the current period**

In 2025, the Bank applied the amendments to the IFRS standards that became mandatory and were adopted by the EU.

In the current period, the only amendment that is mandatorily applicable is that relating to **IAS 21 – Lack of Exchangeability**. The amendments set out the criteria for determining when a currency is considered exchangeable and the methodology for determining the exchange rate when exchangeability is lacking.

The adoption of these amendments **has not had a significant impact** on the information presented or on the amounts reported in the Bank's financial statements.

B. Standards and amendments to existing standards issued by IASB and adopted by the EU, but which have not yet in force

At the date of approval of the financial statements, the Bank has not applied the following amendments, as these will become applicable only for reporting periods beginning on or after **1 January 2026**:

- Amendments to **IFRS 9** and **IFRS 7** regarding the classification and measurement of financial instruments.
- Amendments to **IFRS 9** and **IFRS 7** relating to electricity contracts dependent on natural conditions.
- Amendments to **IFRS 1**, **IFRS 7**, **IFRS 9**, **IFRS 10** and **IAS 7**, representing Annual Improvements to IFRS Standards – Volume 11

C. New standards and amendments to existing standards issued by IASB, but which have not been adopted yet by the EU

According to the stage of adoption at EU level, the following standards and amendments have been issued by IASB but have not yet been adopted by the European Union:

- **IFRS 18 – Presentation and disclosures in financial statements**, with application as envisaged by IASB starting from 1 January 2027. The standard introduces new requirements for the presentation of financial performance, including new categories in the statement of comprehensive income, rules on aggregation/disaggregation and disclosures regarding performance measures defined by management.
- **IFRS 19 – Subsidiaries without public accountability: Disclosures**, applicable from 1 January 2027. The standard provides a set of reduced mandatory disclosures for eligible subsidiaries.
- **Amendments to IAS 21** regarding transition to a hyperinflationary presentation currency, applicable from 1 January 2027.
- **IFRS 14 – Regulatory deferral accounts**, for which the European Commission has decided not to initiate the adoption process until the issuance of a final standard.
- **Amendments to IFRS 10 and IAS 28** concerning sales or contributions of assets between an investor and its associates or joint ventures; the adoption process has been postponed indefinitely by the EU.

3. MATERIAL ACCOUNTING POLICIES (CONTINUED)

II. Accounting policies (continued)

s) Comparatives

Where necessary, comparative amounts have been adjusted and reclassified to reflect presentation changes in the current period, in accordance with Order of the National Bank of Romania No 27/2010 for the approval of the accounting regulations in line with International Financial Reporting Standards applicable to credit institutions, as subsequently amended and supplemented ("Order 27/2010"), as well as with the International Financial Reporting Standards adopted by the European Union ("IFRS") and the interpretations issued by the International Accounting Standards Board ("IASB"), on the basis of which the individual and separate financial statements as at 31 December 2025 have been prepared.

For the financial year ended 31 December 2025, no such adjustments were necessary.

4. FINANCIAL RISK MANAGEMENT

This note presents information on the Bank's exposure to financial risks and the Bank's management of capital.

The Bank is exposed to the following risks arising from financial instruments:

- a. credit risk;
- b. liquidity risk;
- c. market risks (interest rate risk, foreign currency risk and price risk).

Exposure to credit risk is managed through regular analysis of the ability of borrowers and potential borrowers to meet their capital repayment obligations and, where appropriate, by adjusting such lending limits. Exposure to credit risk is also managed in part by obtaining mortgage collateral and, additionally, corporate and personal guarantees.

The Bank's strategy regarding the management of credit risk includes, in particular :

- Limiting and reducing concentration risk: achieved by monitoring particular categories of clients, monitoring exposures to individual borrowers and groups of connected borrowers, monitoring exposures to geographical segments, monitoring exposures to economic sectors, monitoring exposures to specific lending products and diversifying risks;
- Improving the quality of additional collateral ;
- Limiting credit risk by types of additional collateral accepted ;

a. Credit risk

- Control of credit risk: through the credit pre-approval process and subsequent credit control procedures;
- Ensuring the proper management of credit risk through the preparation and analysis of specific reports ;
- Developing and maintaining the internal early warning process and the recovery of overdue receivables ;
- Periodic monitoring of loans, including monitoring of the debt service ratings of borrowers ;
- Review of the portfolio based on a system of credit risk indicators with predefined alert thresholds.

Collateral received from customers

As part of its credit risk management policy, the Bank requires adequate collateral for the approval of loans granted to customers. In accordance with internal regulations, the Bank accepts the following types of assets as collateral:

- Real estate mortgages and production facilities;
- Inventory and equipment;
- Securities;
- Guarantees and cash deposits;
- Receivables;
- Insurance policies;
- Financial guarantees.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

With regard to the types of collateral mentioned above, the Bank's policy is that the ratios between the secured values and the approved loans are as follows:

- Real estate mortgages and guarantee funds: between 110/120% and 120/150%, depending on the client's rating; (exception to this rule: loans granted to professional clients that have a coverage ratio of at least 100%);
- Cash collateral, deposits, securities and financial guarantees: minimum 100%.

The following statements present information on the credit quality of financial assets measured at amortised cost (2025 and 2024). If not specifically mentioned, for financial assets, the amounts represent gross carrying values. For loan commitments and financial guarantee contracts, the amounts represent the amounts committed or, respectively, guaranteed. The explanations of the terms "Stage 1", "Stage 2" and "Stage 3" are included in Note 3.II. (d) (iv).

Customers are classified into 4 risk categories representing the following:

- Standard - all financial assets measured at amortised cost that are current or with days past due of less than 30 days and that are not on the Watch list;
- >30 days – all financial assets measured at amortised cost with days past due of more than 30 days and that are not impaired;
- Watch list - Financial assets measured at amortised cost that are identified as having increased credit risk based on the internal procedure and are classified in Stage 2;
- Loss - Financial assets measured at amortised cost included in Stage 3.

i. Analysis of credit quality Loans and advances granted to banks and investment securities are presented below in accordance with the credit risk quality as at 31 December 2025 and 31 December 2024:

RON	2025			
	Stage 1	Stage 2	Stage 3	Total
Loans and advances to banks				
Standard	2,837,750,840	-	-	2,837,750,840
Loss allowance	- 334,830	-	-	- 334,830
Carrying amount	2,837,416,010	-	-	2,837,416,010
Investment securities				
Standard	2,360,506,730	-	-	2,360,506,730
Loss allowance	- 3,416,480	-	-	- 3,416,480
Carrying amount	2,357,090,250	-	-	2,357,090,250

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

i. Analysis of credit quality (continued)

	2024			
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances to banks				
Standard	3,243,332,814	-	-	3,243,332,814
Loss allowance	-408,339	-	-	-408,339
Carrying amount	3,242,924,475	-	-	3,242,924,475
Investment securities				
Standard	1,970,430,533	-	-	1,970,430,533
Loss allowance	-3,039,574	-	-	-3,039,574
Carrying amount	1,967,390,959	-	-	1,967,390,959

Loans and advances granted to customers at gross carrying amount and amortised cost are presented below according to the credit risk quality as at 31 December 2025 and 31 December 2024:

	2025			
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances granted to customers at amortised cost - gross carrying amount				
Standard	7,825,819,235	-	-	7,825,819,235
>30 days ¹	-	9,537,844	-	9,537,844
Watch list ²	-	597,078,420	-	597,078,420
Loss	-	-	261,131,182	261,131,182
Total gross amount	7,825,819,235	606,616,265	261,131,182	8,693,566,682
Loss allowance	-59,053,228	-52,081,644	-183,852,404	-294,987,277
Carrying amount	7,766,766,007	554,534,620	77,278,778	8,398,579,405

	2024			
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances granted to customers at amortised cost - gross carrying amount				
Standard	6,713,313,831	-	-	6,713,313,831
>30 days	-	196,290	-	196,290
Observation list	-	513,667,623	-	513,667,623
Loss	-	-	222,038,256	222,038,256
Total gross amount	6,713,313,831	513,863,913	222,038,256	7,449,216,001
Loss allowance	-59,798,915	-41,104,667	-151,810,539	-252,714,120
Carrying amount	6,653,514,916	472,759,246	70,227,718	7,196,501,880

¹ The number of days of delay is contaminated at customer level on off-balance sheet exposure and balance sheet exposure.

² Customers on the watch list may register more than 30 days of delay.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

i. Analysis of credit quality (continued)

Loan commitments and financial guarantee contracts at gross carrying amount and amortised cost are presented below depending on the credit risk quality as at 31 December 2025 and 31 December 2024:

	2025			
In RON	Stage 1	Stage 2	Stage 3	Total
Loan commitments and financial guarantee contracts				
Standard	3,196,710,006	-	-	3,196,710,006
>30 days ¹	-	217,187	-	217,187
Watch list	-	103,507,643	-	103,507,643
Loss	-	-	174,339	174,339
Total gross amount	3,196,710,006	103,724,830	174,339	3,300,609,174
Adjustment for impairment	-2,884,066	-683,586	-5,510	-3,573,162

	2024			
In RON	Stage 1	Stage 2	Stage 3	Total
Loan commitments and financial guarantee contracts				
Standard	2,714,058,931	-	-	2,714,058,931
>30 days ¹	-	-	-	-
Watch list	-	77,634,576	-	77,634,576
Loss	-	-	45,319,514	45,319,514
Total gross amount	2,714,058,931	77,634,575	45,319,514	2,837,013,021
Adjustment for impairment	-3,596,946	-786,449	-1,018,413	-5,401,809

The Bank contaminates the debt service at customer level and monitors the related off- balance sheet commitments using the same criteria. Taking into account the days past due parameter, the loans and advances granted to customers at gross carrying amount and amortised cost are further broken down as follows:

RON	2025			
	Stage 1	Stage 2	Stage 3	Total
Loans and advances granted to customers				
Current	7,457,163,753	511,041,069	28,363,922	7,996,568,744
<=30 days	368,655,482	86,037,352	19,385,913	474,078,747
<=90 days	-	9,537,844	161,441,287	170,979,131
<= 180 days	-	-	23,570,207	23,570,207
> 180 days	-	-	28,369,853	28,369,853
Total	7,825,819,235	606,616,265	261,131,182	8,693,566,682
Loss allowance	-59,053,228	-52,081,644	-183,852,404	-294,987,277
Carrying amount	7,766,766,007	554,534,620	77,278,778	8,398,579,405

¹ the number of days past due is contaminated at client level for the off-balance sheet exposure together with the on-balance sheet exposure

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

i. Credit quality analysis (continued)

Loans and advances to customers				
2024				
RON	Stage 1	Stage 2	Stage 3	Total
Current	6,503,214,321	365,473,280	123,227,957	6,991,915,558
<= 30 days	210,099,510	95,106,673	15,703,520	320,909,703
<= 90 days	-	53,279,051	40,334,833	93,613,884
<= 180 days	-	4,910	20,828,699	20,833,608
> 180 days	-	-	21,943,247	21,943,247
Total gross value	6,713,313,831	513,863,913	222,038,256	7,449,216,001
Loss allowance	59,798,915	- 41,104,667	-151,810,539	-252,714,120
Carrying amount	6,653,514,916	472,759,246	70,227,718	7,196,501,880

Given the allocation of the portfolio by categories of credit risk concentration for determining the historical probabilities of default, the loans and advances granted to customers are further broken down as follows:

2025				
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances to customers at amortized cost - gross carrying amount				
Agriculture	1,152,308,187	276,678,930	76,618,886	1,505,606,003
Real estate	2,049,898,106	45,399,466	130,590,517	2,225,888,089
Enterprises	2,087,082,136	173,645,999	34,796,091	2,295,524,226
Units Administrative-Territorial (UAT)	782,041,156	-	-	782,041,156
Professionals	1,025,429,577	96,787,354	10,004,365	1,132,221,296
Individuals	729,060,073	14,104,515	9,121,324	752,285,912
Total	7,825,819,235	606,616,265	261,131,182	8,693,566,682
Loss allowance	-59,053,228	-52,081,644	-183,852,404	-294,987,277
Carrying amount	7,766,766,007	554,534,620	77,278,778	8,398,579,405

2024				
RON	Stage 1	Stage 2	Stage 3	Total
Loans and advances to customers at amortised cost - gross carrying amount				
Agriculture	1,092,839,530	216,056,061	66,677,039	1,375,572,630
Real estate	1,414,501,554	131,869,575	103,621,941	1,649,993,070
Enterprises	1,789,541,989	94,336,816	29,683,628	1,913,562,432
Administrative-territorial units (UAT)	573,240,794	-	-	573,240,794
Professionals	1,071,990,917	57,366,743	13,645,269	1,143,002,928
Individuals	771,199,048	14,234,718	8,410,380	793,844,146
Total	6,713,313,831	513,863,913	222,038,256	7,449,216,001
Loss allowance	-59,798,915	- 41,104,667	- 151,810,539	- 252,714,120
Carrying amount	6,653,514,916	472,759,246	70,227,718	7,196,501,880

The Bank holds loans and advances granted banks of 2,837,416,010 RON as at 31 December 2025 (31 December 2024: 3,242,924,475 RON).

Loans and advances made with the National Bank of Romania in the amount of 2,072,036,773 RON (31 December 2024: 2,384,889,039 RON) fall within rating BBB-, based on ratings issued by Fitch, Moody's or Standard & Poor's.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

i. Credit quality analysis (continued)

Loans and advances to banks can be analysed according to the following rating:

<i>RON</i>	31 December 2025	31 December 2024
No rating	-	-
A-	39,217,870	-
AA-	17,269,100	8,525,902
B+	-	-
BB-	38,886,905	132,885,974
BB	382,507,683	348,392,873
BB+	-	-
BBB-	2,072,036,773	2,384,889,039
BBB	-	25,751
BBB+	287,832,509	368,544,965
Total	2,837,750,840	3,243,264,505

Government securities at amortised cost as at 31 December 2025 and 31 December 2024 include treasury bonds issued by the Ministry of Finance of Romania, (with a BBB- rating from Standard & Poor), issued by CEC Bank, issued by the Cluj County Council and issued by the City Hall of the Municipality of Bucharest.

ii. Additional collateral held

The Bank holds collateral for certain credit exposures. The following tables stratify credit exposures divided into loans granted to retail customers and loans and advances to non-retail customers (legal entities) by loan-to-value (LTV) ratio bands.

LTV is calculated as the ratio of the gross value of the loan or the committed amount for loan commitments to the value of the collateral. The valuation of collateral excludes any adjustments for obtaining and selling the collateral. The value of the collateral is based on the most recent valuations. The Bank's policy is to revalue residential collateral every three years and commercial collateral every year.

<i>RON</i>	Gross carrying amounts					
RETAIL	31 December 2025			31 December 2024		
LTV	Not impaired loans and advances to customers	Impaired loans and advances to customers	TOTAL	Not impaired loans and advances to customers	Impaired loans and advances to customers	TOTAL
Less than 50%	421,281,981	1,606,409	422,888,390	440,866,538	982,490	441,849,028
51-70%	126,311,815	1,528,145	127,839,960	137,119,511	1,391,531	138,511,042
71-90%	234,234,851	2,750,654	236,985,505	248,208,336	2,563,569	250,771,905
91-100%	88,989,363	3,614,257	92,603,620	107,519,248	2,702,521	110,221,769
More than 100%	22,819,695	439,864	23,259,559	26,491,733	993,167	27,484,900
Grand total	893,637,704	9,939,329	903,577,033	960,205,365	8,633,277	968,838,642

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a Credit risk (continued)

ii. Additional collateral held (continued)

RON	Gross carrying amounts					
NON RETAIL	31 December 2025			31 December 2024		
LTV	Not impaired loans and advances to customers	Impaired loans and advances to customers	TOTAL	Not impaired loans and advances to customers	Impaired loans and advances to customers	TOTAL
Less than 50%	3,033,166,594	161,165,955	3,194,332,549	2,633,510,761	139,070,199	2,772,580,960
51-70%	1,919,010,810	26,551,072	1,945,561,882	1,465,166,265	19,766,360	1,484,932,625
71-90%	1,816,577,306	27,889,515	1,844,466,821	1,429,568,537	25,411,212	1,454,979,749
91-100%	405,987,512	11,992,718	417,980,230	353,292,862	3,901,263	357,194,125
More than 100%	364,055,573	23,592,594	387,648,166	385,433,954	25,255,945	410,689,899
Grand total	7,538,797,795	251,191,854	7,789,989,648	6,266,972,379	213,404,979	6,480,377,358

The table below presents the carrying amount and the value of the identifiable tangible collateral (mainly real estate and cash collateral) held in exchange for loans and advances granted to customers. For each loan, the disclosed collateral value is capped at the carrying amount of the loan for which it is held.

RON	2025		2024	
	Carrying amount	Collateral	Carrying amount	Collateral
Stages 1 and 2	8,321,300,626	6,193,074,771	7,126,274,162	5,071,271,035
Stage 3	77,278,778	228,824,502	70,227,718	184,806,865

Inputs, assumptions and techniques used for estimating impairment

The key inputs in measuring ECL (expected credit loss) include the following variables:

- Probabilities of default ("PD");
- Loss given default ("LGD");
- Exposure at default ("EAD"); and
- Forward-looking information ("FLI").

For the purpose of estimating PDs, the Bank collects information on performance and default in respect of its credit risk exposures analysed by borrower and by product type. The Bank uses statistical models to analyse the data collected and to generate estimates of the lifetime PD of the exposures and how these are expected to change over time. This includes identifying and calibrating the relationships between changes in default rates and changes in key macroeconomic factors – gross domestic product ("GDP").

LGD is the amount of the probable loss in the event of a default. The Bank estimates the LGD parameters based on the historical recovery rates of receivables against counterparties in default. The purpose of the LGD calculation is to reflect the cash flows arising from the different ways in which loans can be recovered, not only through enforcement. Therefore, the following two components are determined: secured LGD, which reflects the Bank's collateral recovery experience by type of collateral; unsecured LGD, which reflects the recoverability of the unsecured exposure for each of the homogeneous portfolios. These are calculated based on the discounted cash flow using the effective interest rate as the discount factor.

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

ii. Additional collateral held (continued)

EAD represents the expected exposure in case of default. The Bank derives the EAD from the current exposure to the counterparty and potential changes of the current amount permitted by the contract, including amortisation. The EAD of a financial asset is the gross carrying amount at default. For loan commitments and financial guarantees, the EAD takes into account the amount drawn as well as potential future amounts that may be drawn or repaid under the contract using credit conversion factors.

ECL for exposures in Stage 1 is calculated by multiplying the twelve-month PD by LGD and EAD. Lifetime ECL is calculated by multiplying the lifetime PD by LGD and EAD.

Subject to the use of a maximum twelve-month PD for financial assets for which the credit risk has not increased.

The Bank monitors the effectiveness of the criteria used to identify significant increases in credit risk through periodic reviews in order to confirm that:

- the criteria are able to identify significant increases in credit risk before the exposure is in default;
- the criteria are not aligned with the point at which an asset becomes 30 days past due;
- the average time between the identification of a significant increase in credit risk and the state of default appears reasonable;
- exposures are not, in general, transferred directly from measurement of twelve-month ECL to credit-impaired as a result of credit risk; and
- there is no unwarranted volatility in the expected loss allowances arising from transfers between twelve-month PD (Stage 1) and lifetime PD (Stage 2).

iii. Amounts arising from expected credit losses ("ECL")

Where a parameter is modelled on a collective basis, financial instruments are grouped on the basis of shared risk characteristics, which include the type of counterparty and product type. Grouping is subject to periodic review to ensure that exposures within a given group remain appropriately homogeneous. The current groups are: individuals, corporates, agri-food, professionals, real estate, banks, government securities.

Credit risk is considered to have increased significantly since initial recognition based on quantitative and qualitative factors related to the Bank's credit risk management processes. This will be the case for exposures that meet certain heightened risk criteria that lead to placement on a watchlist. Such factors are based on its expert judgement and relevant historical experience:

- debt service of loans with other financial institutions
- restructuring operations in the probation period
- financial difficulties at the level of the Bank's client Bank
- deterioration of the client's rating
- clients with insolvency petitions filed by third parties
- other qualitative criteria, depending on severity, such as: decrease in turnover through the Bank's accounts, CIP incidents, breach of contractual terms, garnishments measured as a percentage of turnover, PAR 90 over the last 12 months, deterioration of the rating to D2 etc.

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

If there is evidence that there is no longer a significant increase in credit risk compared with initial recognition, then the loss allowance for an instrument reverts to measurement of twelve-month ECL.

The Bank incorporates forward-looking information into the assessment of ECL. The Bank formulates three economic scenarios: a base case, which is the median scenario, and two less probable scenarios, one optimistic and one crisis scenario.

The Bank uses at least three macroeconomic scenarios to achieve the objective of measuring expected credit losses in a way that reflects an impartial and probability-weighted outcome. The scenarios are reflected in the risk parameters for the next 3 years and weights are assigned to each scenario, which represent the probability of occurrence for each of these scenarios.

The Bank has identified and documented the key drivers of credit risk and credit losses for each portfolio of financial instruments and, using an analysis of historical data, has estimated the relationships between the macroeconomic variables and credit risk and credit losses.

The macroeconomic indicators used in the Forward-Looking Indicators component of the IFRS 9 ECL model are: unemployment rate (UR), long-term interest rate (IR), gross domestic product (GDP), consumer price index (CPI) and house price index (HPI). These are the parameters for which an appropriate correlation has been identified with the Bank's historical PD. The choice of these indicators for the FLI component also has a qualitative dimension, with the following aspects: although there are more indicators that statistically appear to be correlated with the evolution of the default rate, those for which the correlation is not economically grounded (for example Government Consolidated Gross Debt, M1 Cash) or those that are correlated with each other have been avoided.

As of 31 December	2025			2024		
	Baseline scenario	Best-case scenario	Worst case scenario	Baseline scenario	Best-case scenario	Worst case scenario
Scenario probability weighting	30%	30%	40%	30%	30%	40%

The external information taken into consideration includes economic data and forecasts published by governmental bodies and monetary authorities, supranational organizations such as the International Monetary Fund, the World Bank, the European Commission etc.

Future scenarios are reviewed whenever forecasts that are significant and relevant are available. A comprehensive review is performed at least annually on the scenario design, with the close involvement of the Bank's senior management.

The Bank used the following macroeconomic scenarios in calculating the expected credit losses for December 2025:

GDP:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2025	-0.46%	0.6%	0.4%	-1.9%
2026	-0.89%	1.2%	1.3%	-4.1%
2027	1.15%	1.8%	1.9%	0.1%
2028	1.63%	2.4%	2.9%	0.1%

Unemployment:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2025	6.61%	6.0%	5.9%	7.6%
2026	7.89%	6.1%	5.8%	10.8%
2027	8.25%	5.9%	5.6%	12.0%
2028	8.19%	5.8%	5.5%	12.0%

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts resulting from expected credit losses ("ECL) (continued)

Consumer price index:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2025	8.78%	7.3%	7.30%	11.0%
2026	8.17%	7.2%	6.70%	10.0%
2027	6.96%	5.2%	6.0%	9.0%
2028	6.00%	4.0%	-	-

Real estate index:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2025	-1.28%	-0.5%	0.5%	-3.2%
2026	-1.54%	0.0%	1.4%	-4.9%
2027	-0.32%	0.5%	1.1%	-2.0%
2028	-0.10%	-	-	-

Long-term interest rate:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2025	8.48%	6.50%	6.63%	11.34%
2026	7.63%	5.75%	5.98%	10.27%
2027	6.27%	5.00%	5.92%	7.48%
2028	6.00%	4.50%	-	-

Note: We mention that for the year 2028, no data were available.

The Bank used the following macroeconomic scenarios in calculating the expected credit losses for December 2024:

GDP:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2024	-0.56%	0.9%	1.1%	-2.9%
2025	-1.45%	1.0%	1.5%	-5.5%
2026	1.86%	2.0%	2.2%	1.5%
2027	1.86%	-	-	-

Unemployment:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2024	7.90%	7.0%	6.0%	10.0%
2025	8.60%	7.5%	6.5%	11.0%
2026	9.15%	8.0%	6.5%	12.0%
2027	9.15%	-	-	-

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

Consumer price index:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2024	9.6%	6.0%	5.5%	15.4%
2025	6.6%	5.5%	5.0%	8.6%
2026	5.3%	5.0%	4.5%	6.0%
2027	3.5%	-	-	-

Real estate index:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2024	-2.1%	-2.0%	0.5%	-4.0%
2025	-3.1%	-1.5%	0.5%	-7.0%
2026	-0.4%	-1.0%	0.5%	-0.6%
2027	0.2%	-	-	-

Long-term interest rate:

Year of forecast	AVERAGE MACRO SCENARIO	Baseline scenario	Best-case scenario	Worst-case scenario
2024	8.59%	7.00%	6.50%	11.34%
2025	7.86%	6.50%	6.00%	10.27%
2026	7.40%	6.00%	6.00%	9.50%
2027	6.80%	-	-	-

Note: We mention that for the year 2027, data were not available.

The Bank carried out a sensitivity analysis of the value of expected credit losses on loans, over a 12-month horizon, based on data as at December 2025, using only the assumptions from the most pessimistic scenario, and the calculated impact was an increase in ECL of 72,3 million RON. Based on data as at December 2025, the impact was an increase in ECL of 22,3 RON.

Modified financial assets

When the terms of a financial asset are modified without leading to derecognition, the assessment of a significant increase in credit risk is performed by comparing the situation at the reporting date, based on the modified terms, with the original contractual conditions.

If the modification results in the derecognition of the asset, a new loan is recognised, which is classified in Stage 1 (assuming that it is not impaired at the time of recognition).

The Bank renegotiates loans granted to customers in financial difficulty (called "restructuring activities") in order to maximise collection opportunities and reduce the risk of default. In accordance with the Bank's restructuring policy, loan restructuring is granted selectively if the debtor is currently in a state of non-repayment or if there is a high risk of default, there is evidence that the debtor has made all reasonable efforts to pay under the original contract, and the debtor must be able to comply with the revised terms. The revised terms usually include extending the maturity, changing the schedule of interest payments and changing the terms of the loan contracts. Both retail and corporate loans may be subject to restructuring. The Bank's Credit Committee regularly reviews reports on restructurings. For modified financial assets, as part of the Bank's restructuring policy, the debtor's payment performance is assessed based on the modified contractual terms and takes into account various behavioural indicators. In general, restructuring is a qualitative indicator of a significant increase in credit risk, and an expectation of restructuring may constitute evidence that an exposure is impaired (see Note 3.II.d), vi).

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

A client must demonstrate consistent payment behaviour over a period of time (a minimum of 12 months) before the exposure is no longer considered to be impaired, so that the impairment allowance reverts to a measure equal to that resulting from the Stage 2 calculation during a 24-month probation period and subsequently in Stage 1, if good payment behaviour is proven.

The gross carrying amount of loans with renegotiated terms (and the impairment allowance) is as follows:

31 December 2025 RON	Stage 1	Stage 2	Stage 3	Total
Gross amount	3,559,712	2,085,135	165,676,518	171,321,365
Allowance for impairment	-173,108	-183,721	-123,744,733	-124,101,562
Carrying amount	3,386,604	1,901,414	41,931,784	47,219,802

31 December 2024 RON	Stage 1	Stage 2	Stage 3	Total
Gross amount	6,774,277	2,982,219	144,736,793	154,493,289
Allowance for impairment	-239,489	-199,794	-103,015,501	-103,454,784
Carrying amount	6,534,788	2,782,425	41,721,292	51,038,505

Restructured exposures are loan contracts for which restructuring measures have been applied and which are still under monitoring.

ECL changes and impact in 2025 In the quarter second, third and respectively fourth of 2025 the forecasts of the indicators used and in the macroeconomic scenarios. Also, in the fourth quarter of 2025 were updated the parameters of risk and the macroeconomic components.

For the portfolios Agri, Corporate, Retail, Professionals and Real Estate, at 31 December 2025, the segmentation of the curves of PD was differentiated by broad rating classes (A, B, C, D), ensuring a more accurate calibration of the risk for each segment and reflecting the specific default behaviour by rating class. Rating class E is associated with stage 3. In the case of the RealEstate segment, due to the number limited of defaults there are defined three curves: one for rating A, one for rating B, and the third common curve for ratings C+D, considering the similarity in risk behaviour, reflecting the higher risk associated with these ratings. For the other segments, the PD curves are distinct, this granularity allows a more accurate capture of the differences in the risk behaviour.

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

Impairment adjustments

The following tables present reconciliations from the opening balance to the closing balance of the allowance for expected losses, by class of financial instrument.

Changes and impact on expected losses related to loans and advances granted to banks in 2025 and 2024:

	2025			
<i>RON</i>	Stage 1	Stage 2	Stage 3	Total
Loans and advances to banks				
Balance as of 1 January	408,339	-	-	408,339
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Net remeasurement of loss allowance	-73,509	-	-	-73,509
Balance at 31 December 2025	334,830	-	-	334,830

	2024			
<i>RON</i>	Stage 1	Stage 2	Stage 3	Total
Loans and advances granted to banks				
Balance as of 1 January	326,112	-	-	326,112
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Net remeasurement of loss allowance	82,227	-	-	82,227
Balance at 31 December 2024	408,339	-	-	408,339

Changes and impact in expected losses relating to investment securities at amortised cost in the year 2025 and 2024:

	2025			
<i>RON</i>	Stage 1	Stage 2	Stage 3	Total
Investment securities				
Balance at 1 January	3,039,574	-	-	3,039,574
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Net remeasurement of loss allowance	376,906	-	-	376,906
Balance at 31 December 2025	3,416,480	-	-	3,416,480

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts resulting from expected credit losses ("ECL") (continued)

In RON	2024			Total
	Stage 1	Stage 2	Stage 3	
Investment securities				
Balance as at 1 January	240,077	-	-	240,077
Transfer to Stage 1	-	-	-	-
Transfer to Stage 2	-	-	-	-
Transfer to Stage 3	-	-	-	-
Net remeasurement of expected credit losses	2,799,497	-	-	2,799,497
Balance as at 31 December 2024	3,039,574	-	-	3,039,574

Changes and impact on expected losses related to loans and advances granted to customers in the years 2025 and 2024:

	2025			
<i>In RON</i>	Stage 1	Stage 2	Stage 3	Total
Expected losses - Loans and advances to customers				
Balance as of 1 January	59,798,915	41,104,667	151,810,539	252,714,120
Transfer to Stage 1	9,654,459	-9,654,459	-	-
Transfer to Stage 2	-4,720,036	4,822,652	-102,616	-
Transfer to Stage 3	-539,443	-3,326,147	3,865,590	-
Net remeasurement of expected credit losses due to changes in credit risk	-25,264,035	18,410,537	57,428,603	50,575,106
Expected losses for new financial assets	25,086,848	7,371,386	2,158,512	34,616,746
Expected losses for derecognized assets	-4,963,479	-6,646,992	-19,701,492	-31,311,964
Correction of interest income	-	-	2,963,378	2,963,378
Expected losses of loans written off	-	-	-14,570,109	-14,570,109
Balance as of 31 December 2024	59,053,228	52,081,644	183,852,404	294,987,277

	2024			
In RON	Stage 1	Stage 2	Stage 3	Total
Expected losses - Loans and advances granted to customers				
Balance as of 1 January	64,842,913	50,362,383	99,561,631	214,766,927
Transfer to Stage 1	18,659,578	-9,816,907	-8,842,671	-
Transfer to Stage 2	-2,394,368	26,629,834	-24,235,466	-
Transfer to Stage 3	-582,407	-11,024,752	11,607,159	-
Net remeasurement of expected credit losses due to changes in credit risk	-37,502,942	-13,437,012	99,539,806	48,599,852
Expected losses for new financial assets	26,770,990	14,023,733	2,903,021	43,697,745
Expected losses for derecognized assets	-9,994,849	-15,632,612	42,910,306	17,282,844
Correction of interest income	-	-	1,908,242	1,908,242
Expected losses of loans written off	-	-	-73,541,490	-73,541,490
Balance as of 31 December 2024	59,798,915	41,104,667	151,810,539	252,714,120

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

Changes and impact on expected losses related to credit commitments, letters of credit and financial guarantees in 2025 and 2024

	2025			
<i>In RON</i>	Stage 1	Stage 2	Stage 3	Total
Loan commitments, letters of credit and financial guarantees				
Balance at 1 January	3,596,947	786,449	1,018,413	5,401,809
Transfer to Stage 1	91,227	-91,227	-	-
Transfer to Stage 2	-161,371	164,505	-3,133	-
Transfer to Stage 3	-159	-	159	-
Net remeasurement of expected credit losses due to changes in credit risk	-1,566,857	163,190	2,673	-1,400,995
Expected losses for new financial assets	2,104,290	340,050	2,022	2,446,363
Expected losses for derecognised assets	-1,180,011	-679,380	-1,014,624	-2,874,015
Balance at 31 December 2025	2,884,066	683,586	5,510	3,573,162

	2024			
<i>In RON</i>	Stage 1	Stage 2	Stage 3	Total
Loan commitments, letters of credit and financial guarantees				
Balance at 1 January	3,906,436	1,799,295	135,321	5,841,052
Transfer to Stage 1	364,620	-364,620	-	-
Transfer to Stage 2	-25,271	25,271	-	-
Transfer to Stage 3	-262	-3,837	4,099	-
Net remeasurement of expected credit losses due to changes in credit risk	-2,175,646	-647,860	673,132	-2,150,374
Expected losses for new financial assets	2,915,520	453,634	311,320	3,680,474
Expected losses for derecognised financial assets	-1,388,448	-475,435	-105,459	-1,969,343
Balance at 31 December 2024	3,596,946	786,449	1,018,413	5,401,809

Total loans and advances to customers in RON in 2025 and 2024 - gross amount

	2025			
<i>In RON</i>	Stage 1	Stage 2	Stage 3	Total
Loans and advances to customers				
Balance at 1 January	6,713,313,831	513,863,913	222,038,256	7,449,216,001
Transfer to Stage 1	132,063,666	-132,063,666	-	-
Transfer to Stage 2	-432,072,152	432,527,026	-454,874	-
Transfer to Stage 3	-37,090,605	-33,950,149	71,040,754	-
Changes that did not result in derecognition ¹	-687,379,475	-136,022,783	5,581,717	-817,820,541
New financial assets	2,721,108,528	90,490,116	7,231,540	2,818,830,184
Financial assets that have been derecognised ²	-584,124,560	-128,228,191	-29,736,102	-742,088,853
Loans removed from the balance sheet	-	-	-14,570,109	-14,570,109
Balance at 31 December 2025	7,825,819,235	606,616,265	261,131,182	8,693,566,682

¹ Include draw-downs and repayments for loans outstanding at 1 January, not closed at 31 December.² Loans fully derecognized from the bank's balance sheet which the bank considers they meet the derecognition criteria and loan derecognition from normal or early repayments.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

The outstanding contractual amount of financial assets that were derecognised during the year 2025 amounts to 14,570,109 RON (2024: 73,541,490 RON).

In RON	2024			
	Stage 1	Stage 2	Stage 3	Total
Loans and advances to customers				
Balance at 1 January	5,989,464,859	683,657,056	143,989,821	6,817,111,736
Transfer to Stage 1	148,503,942	-138,327,258	-10,176,684	-
Transfer to Stage 2	-253,289,356	287,749,597	-34,460,242	-
Transfer to Stage 3	-47,634,235	-131,417,886	179,052,121	-
Changes that did not result in derecognition ³	-926,310,013	-129,833,729	-19,731,767	-1,075,875,509
New financial assets	2,621,140,834	137,543,693	4,846,706	2,763,531,233
Financial assets that were derecognised ⁴	-818,562,200	-195,507,559	32,059,790	-982,009,969
Loans removed from the balance sheet	-	-	-73,541,490	-73,541,490
Balance at 31 December 2024	6,713,313,831	513,863,913	222,038,256	7,449,216,001

Loan commitments and financial guarantee contracts in the year 2025 and 2024 - off-balance sheet gross amount

In RON	2025			
	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January	2,714,058,931	77,634,576	45,319,515	2,837,013,021
Transfer to Stage 1	3,956,489	-3,956,489	-	-
Transfer to Stage 2	-96,531,329	96,631,329	-100,000	-
Transfer to Stage 3	-281,955	-	281,955	-
Changes that did not result in derecognition ¹	-675,171,703	-29,697,563	-217,720	-705,086,986
Newly originated financial assets	1,972,372,905	36,037,757	101,896	2,008,512,558
Financial assets that have been derecognised ²	-721,693,332	-72,924,780	-45,211,307	-839,829,419
Balance at 31 December 2025	3,196,710,006	103,724,830	174,339	3,300,609,174

In RON	2024			
	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January	1,681,854,736	236,545,735	2,680,059	1,921,080,530
Transfer to Stage 1	27,271,372	-27,271,372	-	-
Transfer to Stage 2	-9,670,458	9,670,458	-	-
Transfer to Stage 3	-153,432	-91,937,828	92,091,261	-
Changes that did not result in derecognition ³	-381,171,294	-15,346,070	-48,781,411	-445,298,775
Newly originated financial assets	2,018,126,229	15,821,410	1,001,457	2,034,949,096
Financial assets that have been derecognised ⁴	-622,198,222	-49,847,757	-1,671,851	-673,717,830
Balance at 31 December 2024	2,714,058,931	77,634,576	45,319,514	2,837,013,021

In 2025, as in 2024, there were no transfers between stages for the investment securities or the deposits and current accounts with other banks. The deposits and current accounts with other banks, the National Bank of Romania and the securities held by the bank are classified in Stage 1.

³ Includes drawdowns and repayments related to loans outstanding as at 1 January, which are not closed as at 31 December.

⁴ loans fully derecognised from the Bank's statement of financial position for which the Bank considers that they meet the derecognition criteria in accounting and loan derecognitions from normal or early repayments.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

a. Credit risk (continued)

iii. Amounts arising from expected credit losses ("ECL") (continued)

The Bank's maximum exposure to credit risk is as follows:

<i>In RON</i>	31 December 2025	31 December 2024
Cash and cash equivalents	61,953,218	89,282,554
Loans and advances to the National Bank of Romania	1,921,623,531	2,282,980,518
Loans and advances to banks	915,792,479	959,943,957
Loans and advances to customers	8,398,579,405	7,196,501,880
Investment securities at amortized cost	2,357,090,250	1,967,390,959
Loan commitments and financial guarantee contracts	3,297,036,012	2,831,611,214
Total	16,952,074,895	15,327,711,082

iv). Concentration risk

The Bank monitors concentration risk by geographical regions and by industries/sectors:

Analysis by geographical sectors 2025

Indicator	Bucharest-Ilfov	South (Muntenia)	Centre-North-West (Transylvania)	South-East	North-East	Total
% Exposure	62.25	4.34	15.18	7.55	10.68	100.00
% NPL	3.42	3.53	1.82	2.92	2.11	3.00
% Stage 2	6.65	7.08	5.18	14.42	6.15	6.98

Analysis by geographical sectors – 2024

Indicator	Bucharest-Ilfov	South (Muntenia)	Centre-North-West (Transylvania)	South-East	North-East	Total
% Exposure	61.94	5.04	13.78	8.87	10.37	100
% NPL	3.19	4.13	1.59	3.92	2.24	2.98
% Stage 2	6.43	5.40	5.07	14.87	6.01	6.90

Analysis by industries	31 December 2025	31 December 2024
Construction	779,362,574	1,475,236,905
Wholesale and retail trade	581,764,359	550,525,210
Agriculture, forestry and fishing	1,533,852,377	1,330,975,780
Real estate transactions	1,854,770,172	606,960,342
Manufacturing industry	230,041,313	148,912,346
Professional, scientific and technical activities	454,243,549	386,077,900
Hotels and restaurants	310,178,707	264,891,550
Financial intermediation and insurance	153,887,170	152,588,979
Health and social assistance	436,799,423	451,546,487
Telecommunications; programming and consultancy activities in information technology; other information services	115,936,011	108,429,816
Production and supply of electricity and heat, gas, hot water and air conditioning	220,661,065	181,157,834
Transport and storage	88,723,714	95,903,012
Other service activities	56,733,509	23,999,564
Water distribution; sanitation, waste management, decontamination activities	11,276,165	15,012,387
Administrative service activities and support service activities	46,834,495	34,905,775
Performing, cultural, sports and recreational activities	57,860,091	34,462,062
Extractive industry	17,421,187	6,933,224
Education	21,366,822	13,130,469
Public administration and defense; social insurance in the public system	782,041,156	573,240,794
Publishing activities; broadcasting of radio and television programmes; content production and distribution activities	10,578,603	-
Individuals	929,234,215	994,325,565
TOTAL	8,693,566,682	7,449,216,001

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

b. Liquidity risk

Liquidity risk refers to the availability of sufficient funds to honour deposit withdrawals and other financial commitments associated with financial instruments when they fall due.

The Bank controls these types of risks by analysing maturities, establishing the Bank's strategy for the next financial period.

To monitor and manage liquidity risk, the Bank calculates the following liquidity indicators:

- Immediate liquidity: this liquidity indicator is calculated as the ratio of highly liquid assets to total borrowed funds and is used to monitor liquidity on a daily basis by the Bank's management and the Treasury Division. The minimum limit set by the Bank's management for this indicator in 2025 was 42%. On 31 December 2025, the liquidity indicator was 42.68%.
- Liquidity indicator depending on maturity bands: this liquidity indicator is calculated by segregating the Bank's assets from its liabilities as updated by their remaining maturities. This indicator is calculated monthly and is monitored by the Bank's management and the Treasury Division. The minimum limit set by the Bank's management for this indicator is 100%.
- Degree of concentration of resources: this indicator is calculated to assess the Bank's dependence on a single depositor or a group of affiliated depositors and is calculated as the total funds from individual depositors divided by total borrowed funds. This indicator is calculated on a regular basis, and its maximum limit is set by the Bank's management at 40%.
- The ratio of loans to total assets and loans to borrowed funds: these liquidity indicators are calculated periodically to determine whether the strategic directions of the liquidity risk management policies are complied with by the Bank's lending policy. The maximum limits set by the Bank's management for these indicators are approximately 65% and 75%, respectively.

Analysis of the maturity of assets and liabilities as at 31 December 2025 and 31 December 2024 is presented below. The remaining maturities of assets and liabilities are presented here in accordance with the provisions of the contracts concluded by the Bank. However, current accounts and customer deposits have proved historically inelastic, which means that they will not be repaid in accordance with the contract but rather rolled over; therefore, the liquidity gap presented in these financial statements does not represent an imminent risk for the Bank.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

b. Liquidity risk (continued)

ANALYSIS OF THE MATURITY OF FINANCIAL LIABILITIES BASED ON UNDISCOUNTED CASH FLOWS

The following tables detail the Bank's remaining contractual maturities for its financial liabilities. This analysis has been prepared on the basis of undiscounted cash flows of financial liabilities and of the earliest date on which the Bank can be required to settle its liabilities and includes both interest and principal cash flows.

31 December 2025	Up to 1 month	1-3 Months	3 months – 1 year	1-5 years	Over 5 years	Total
Deposits from other banks	1,936,730	-	-	-	-	1,936,730
Deposits and savings accounts of customers (including interest)	7,068,128,471	1,831,368,108	2,613,326,817	253,079,041	-	11,765,902,437
Issued bonds	1,523,338	2,021,714	10,468,070	228,729,678	44,367,056	287,109,856
Loans from financial institutions	15,254	1,702,223	2,065,634	6,781,066	-	10,564,177
Subordinated loan	494,600	942,218	4,646,893	19,767,927	79,098,395	104,859,035
Lease liability	1,489,557	2,927,415	12,321,354	28,530,858	944,414	46,213,597
Total financial liabilities	7,073,587,951	1,838,961,677	2,642,828,768	536,797,571	124,409,865	12,216,585,832
Off-balance sheet commitments	3,300,609,174	-	-	-	-	3,300,609,174

31 December 2024	Up to1 month	1-3Months	3 months– 1 year	1-5years	Over5 years	Total
Deposits from other banks	853,213	-	-	-	-	853,213
Deposits and savings accounts of clients (including interest)	6,240,587,364	1,782,101,655	2,533,315,479	373,511,695	45,933	10,929,562,127
Issued bonds	1,486,478	1,988,470	10,188,490	230,846,003	46,169,158	290,678,599
Loans from financial institutions	24,595	1,678,947	1,694,696	3,170,789	-	6,569,026
Subordinated loan	495,338	941,881	4,653,246	62,297,812	40,432,255	108,820,532
Lease liability	4,346,935	12,549,080	14,510,400	12,719,823	10,751,859	54,878,097
Total financial liabilities	6,247,793,924	1,799,260,032	2,564,362,311	682,546,121	97,399,205	11,391,361,593
Off-balance sheet commitments	2,837,013,021	-	-	-	-	2,837,013,021

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

ANALYSIS OF ASSETS AND LIABILITIES BY REMAINING MATURITY (DISCOUNTED CASH FLOWS)

31,12,2025	Up to one month	From 1 to 3 months	From 3 months to 1 year	From 1 year To 5 years	Over 5 years	Maturity undefined	Total
ASSETS							
Petty cash	61,953,218	-	-	-	-	-	61,953,218
Financial assets at fair value through profit or loss	21,374,485	-	-	-	-	-	21,374,485
Loans and advances to the National Bank of Romania	1,921,623,531	-	-	-	-	-	1,921,623,531
Loans and advances to banks	916,127,309	-	-	-	-	-334,830	915,792,479
Loans and advances to customers	121,686,144	209,437,445	1,220,569,195	3,705,838,688	3,141,047,934	-	8,398,579,405
Investment securities at amortised cost	211,596,136	-	436,098,703	1,709,395,411	-	-	2,357,090,250
Investment in associates	-	-	-	-	-	9,800,000	9,800,000
Other financial assets	56,610,445	-	-	-	-	38,354,761	94,965,206
Total assets	3,310,971,268	209,437,445	1,656,667,898	5,415,234,099	3,141,047,934	48,121,278	13,676,413,368
LIABILITIES							
Customer deposits	7,225,162,579	1,710,591,052	2,568,233,413	167,067,184	-	-	11,671,054,227
Customer deposits and savings accounts	1,936,730	-	-	-	-	-	1,936,730
Loans from financial institutions	16,313	1,593,281	1,601,727	5,047,940	-	-	8,259,261
Bonds issued	-694,779	-	-	249,832,795	-	-	249,138,016
Subordinated loans	-518,354	-	258,134	40,788,000	35,689,500	-	76,217,279
Other financial liabilities	1,360,308	2,682,178	11,428,105	27,284,517	614,104	-	43,369,212
Total liabilities	7,227,392,046	1,715,111,748	2,582,414,628	491,266,777	36,633,914	-	12,104,523,061
Liquidity risk as of 31 December 2024	-3,916,420,778	-1,505,674,303	-924,746,730	4,923,967,322	3,104,414,020	5,104,759	-
Cumulative liquidity gap	-3,916,420,778	-5,422,095,081	-6,347,841,811	-1,423,874,489	1,680,539,531	1,728,660,809	-

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

ANALYSIS OF ASSETS AND LIABILITIES BY REMAINING MATURITY (DISCOUNTED CASH FLOWS)

31.12.2024	Up to one month	From 1 to 3 months	From 3 months to 1 year	From 1 year To 5 years	Over 5 years	Maturity undefined	Total
ASSETS							
Petty cash	89,282,554	-	-	-	-	-	89,282,554
Financial assets at fair value through profit or loss	-	-	-	-	-	20,453,208	20,453,208
Loans and advances to the National Bank of Romania	2,282,950,518	-	-	-	-	-	2,282,980,518
Loans and advances to banks	860,684,175	30,091,833	-	-	-	69,167,948	959,943,957
Loans and advances to customers	55,342,686	92,652,839	486,472,921	2,277,916,135	4,284,117,299	-	7,196,501,880
Investment securities at amortised cost	-	140,143,693	439,496,574	1,387,750,692	-	-	1,967,390,959
Investment in associates	-	-	-	-	-	9,800,000	9,800,000
Other financial assets	49,901,205	-	-	-	-	39,775,053	89,676,258
Total assets	3,338,161,138	262,888,365	925,969,495	3,665,666,827	4,284,117,299	139,196,209	12,615,994,113
LIABILITIES							
Customer deposits	6,294,583,524	1,720,963,190	2,506,025,875	266,850,905	45,933	39,006,509	10,827,475,936
Customer deposits and savings accounts	853,213	-	-	-	-	-	853,213
Loans from financial institutions	-1,651	1,628,997	1,539,550	3,093,956	-	-	6,260,852
Bonds issued	-38,405	207,163	2,474,730	197,540,862	42,374,485	-	242,558,835
Subordinated loans	-8,890	-17,781	180,234	39,380,358	34,725,450	-	74,259,371
Other financial liabilities	1,287,376	2,575,988	11,310,171	34,757,988	11,310,171	-	50,781,683
Total liabilities	6,296,675,167	1,725,357,557	2,521,530,560	506,866,082	88,456,039	39,006,509	11,177,891,914
Liquidity risk as of 31 December 2024	-2,958,514,029	-1,462,469,192	-1,595,561,065	3,158,800,745	4,195,661,260	100,189,700	-
Cumulative liquidity gap	-2,958,514,029	-4,420,983,221	-6,016,544,286	-2,857,743,541	1,337,917,719	1,438,107,419	-

The Bank's short-term refinancing is supported by access to refinancing facilities from other credit institutions and by the loan line of 60 million USD contracted with Broadhurst Investments Limited, supplemented by an appropriate interest rate policy for attracting resources. The Bank holds pledged assets amounting to 65 million RON used for daily settlements with Visa, Mastercard and SENT. Liquidity risk can be further reduced through reverse-repo transactions with the NBR backed by treasury bills. At the same time, most deposits with maturities of less than 3 months are rollover deposits."

4. FINANCIAL RISK MANAGEMENT (CONTINUED)**c) Market risk**

Market risk represents the current or potential risk that results from adverse market movements in equity prices and interest rates, as well as from changes in foreign exchange rates and commodity prices for the institution's entire credit activity. The objective of market risk management is to manage and control exposures to market risk within acceptable parameters, while at the same time optimizing risk profitability.

Foreign currency risk

The Bank carries out transactions both in RON and in foreign currency. As a result, exposures arise to fluctuations in exchange rates. The Bank is exposed mainly to the risk of changes in the exchange rate for assets and liabilities denominated in US dollars and euros, which constitute the majority of its foreign currency transactions.

In order to manage foreign exchange transaction risk, the Bank keeps its open foreign currency position within the following limits, as required by the National Bank of Romania:

- Net exposure in transactions with a single currency – not more than 10% of total own funds calculated in accordance with the requirements of the National Bank of Romania.
- Total aggregated exposure in foreign currencies – not more than 20% of total own funds calculated in accordance with the requirements of the National Bank of Romania.

At 31 December 2025 and 2024, the Bank's net exposure to foreign exchange risk is as follows:

Currency	31 December 2025	31 December 2024
EUR	4,913,919	3,655,849
USD	2,026,875	328,166
GBP	43,028	-216,801
CHF	206,266	-10,999
SEK	-13,573	-16,276
CAD	-7,831	127,317
HUF	-	-
JPY	-	-
Other	657,002	691,939
Total exposure	7,825,686	4,559,195

All amounts are presented in RON equivalent.

Foreign currency sensitivity analysis

The following information reflects the Bank's sensitivity to depreciation and appreciation of the domestic currency against EUR, USD, GBP, CHF, SEK, CAD, JPY and HUF in case of a 5% variation. Such rate is the sensitivity rate which has been used by the Bank for reporting trading exposure risk for purposes of internal risk management purposes and represents the Bank's assessment of the reasonably possible change in foreign exchange rates in future. The sensitivity analysis includes only outstanding foreign currency denominated monetary assets and liabilities and adjusts their translation at the period end for a 5% change in foreign currency rates.

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

c. Market risk (continued)

The sensitivity analysis includes only monetary foreign currency assets and liabilities outstanding and a 5% change in exchange rate values.

In RON	31 December 2025		31 December 2024	
Currency	+5%	-5%	+5%	-5%
EUR	245,696	-245,696	182,792	-182,792
USD	101,344	-101,344	16,408	-16,408
GBP	2,151	-2,151	-10,840	10,840
CHF	10,313	-10,313	-550	550
SEK	-679	679	-814	814
CAD	-392	392	6,366	-6,366
HUF	-	-	-	-
JPY	-	-	-	-
Other	32,850	-32,850	34,597	-34,597
TOTAL	391,284	-391,284	227,960	-227,960

Interest rate risk

Interest rate risk includes interest rate price risk and interest cash flow risk. Interest rate price risk is the risk that the value of a financial instrument will fluctuate because of changes in market interest rates relative to the interest rates applicable to the financial instrument. Interest rate cash flow risk is the risk that the cost of interest and the associated cash flows will fluctuate over time. The Bank's financial instruments bear mainly both variable and fixed interest. As a result, the Bank is exposed both to interest rate cash flow risk and to interest rate price risk. The interest rates applicable to the various financial assets and liabilities are presented in the Notes to these financial statements.

The management of interest rate risk is carried out by the Bank through the following measures:

- Ensuring the maximum possible matching of the maturities of fixed-interest-bearing funds attracted with those of fixed-interest-bearing assets;
- Limiting the interest rate gap by creating types of interest that have an interest rate structure similar to that of the funds attracted (in terms of maturity, type of interest rates and repricing period);
- Setting the level of the interest rate on the Bank's assets and liabilities;
- Determining the characteristics of interest rates (floating or fixed);
- Analysing maturity mismatches in assets and liabilities, sensitive to changes in the interest rate, and maintaining an adequate asset and liability structure;
- Ensuring interest rate flexibility, periodically changing the rates on the Bank's financial instruments;
- Evaluating the asset structure and the paid liabilities, taking measures aimed at reducing the ratio between the functional asset and the paid liabilities;
- Reviewing the information regarding interest rate risk by the ALCO committee and the Bank's management, with further adjustment of the Bank's policy on attracting and placing funds;
- Projecting the future level of the interest rate based on the factors that may influence its increase or decrease, etc.

4. FINANCIAL RISK MANAGEMENT (CONTINUED)**c. Market risk (continued)****Interest rate risk (continued)**

Analysis of interest rate sensitivity

Starting from the reference date for reporting 30 September 2024, the Bank applies the standardized methodology provided by Regulation (EU) 2024/857 for the assessment of interest rate risk related to activities outside the trading book, determining the potential change in the economic value of equity as a result of changes in interest rate levels under the six standardized shock scenarios: parallel up shock, parallel down shock, steepened shock, flattened shock, short-rate up shock and short-rate down shock, the results being reported to Tier 1 own funds.

The sensitivity analysis presented in the table below shows the impact of the most severe scenario on interest-sensitive exposures outstanding as of 31 December 2025 and 2024:

In RON	31 December 2025	31 December 2024
Equity Tier 1	1,524,384,055	1,439,761,062
Change of economic value (200 bps shock)	-193,507,624	-159,470,257
% of Equity Tier 1	-12.70%	-11.08%

* Note: We mention that Tier 1 own funds are presented without audited profit as at 31 December 2025.

Price risk

The Bank's exposure to market price risk results from financial instruments at fair value through profit and loss measured at market price, and the table below represents an effect of the increase in market price on the profit and loss account.

In RON	31 December 2025		31 December 2024	
	+1%	-1%	+1%	-1%
Financial instruments at fair value sensitive to market price	146,402	-146,402	146,267	-146,267

d. Capital management

The Bank complies with the regulatory capital requirements as of 31 December 2025.

Libra Internet Bank calculates the regulated capital requirement in order to meet the following requirements:

a) for credit risk and the risk of reduction in the value of the receivable related to the entire activity, except for operations in the trading book → 8% of the total risk-weighted exposure amounts, calculated in accordance with Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 and in accordance with National Bank of Romania Regulation No 5/2013 on prudential requirements for credit institutions;

b) for market risk → The Bank applies the standardised approach for market risk, in accordance with the provisions of European Union Regulation 575/2013 for the calculation of capital requirements, of minimum capital under Pillar 1. The Bank does not calculate capital requirements for capital for interest rate risk on the interest rate in the trading book for the purposes of Pillar 1 because it does not hold a trading book as defined by regulation.

The Bank calculates the minimum capital requirements for foreign exchange risk determined in accordance with European Union Regulation no. 575/2013 on prudential requirements for credit institutions and investment firms and amending Regulation (European Union) no. 648/2012; and investment firms and amending Regulation (EU) no. 648/2012;

c) for operational risk relating to the entire activity → capital requirements determined in accordance with European Union Regulation no. 575/2013 on prudential requirements for credit institutions and investment firms and amending Regulation (European Union) no. 648/2012.

4. FINANCIAL RISK MANAGEMENT (CONTINUED)

d. Capital management (continued)

The objective of the Bank is to ensure compliance with regulatory requirements and to assure the shareholders that the Bank has strategies and integrated, sound processes and effective for assessing and maintaining on a permanent basis an appropriate level and type and an appropriate process regarding capital in order to cover the risks to which the Bank is exposed.

In this regard the Bank has implemented the ICAAP framework, which includes aspects such as the organization of the risk management function, the management of risks within the Bank, the description of the risk management process, the approach regarding capital management, the presentation of approaches for determining internal capital corresponding to Pillar 2 requirements, practices for crisis scenarios, practices regarding the internal control system, ICAAP reporting.

ICAAP is integrated in the decision-making process through the use of the results in defining the business strategy and the risk management strategy.

Economic capital is an estimate of expected and unexpected losses and is defined as the amount of capital that a bank must hold (for example, shareholders must invest it) having in view the entire risk and profit structure, in order to limit the probability of failure for a specified time horizon.

The Bank's capital management has two main objectives:

- To ensure that the available capital base is in line with the overall level of risk assumed, as well as with exogenous constraints imposed by capital requirements, by the external rating that the Bank wishes to achieve (if applicable) and by its development plans;
- To optimise the capital structure by selecting a combination of financial instruments that minimises the capital required under regulatory limits

The table below summarises the components of regulatory capital and the indicators for the financial year ended 31 December 2025 and 31 December 2024.

	Dec 2025 – Estimated after audit and approval of financial statements	Dec 2025 – Without audited profit	Dec 2024
EQUITY TIER 1	1,745,053,598	1,524,384,055	1,439,761,062
			1,439,761,062
COMMON EQUITY TIER 1	1,745,053,598	1,524,384,055	
Capital instruments eligible as Common Equity Tier 1 own funds	556,171,200	556,171,200	556,171,200
Retained earnings	871,060,562	650,391,019	562,922,961
Other accumulated items of comprehensive income	82,495,111	82,495,111	66,584,589
Other reserves	236,818,486	236,818,486	236,818,486
Adjustments to Common Equity Tier 1 own funds due to prudential filters	-31,174	-31,174	-30,253
Other intangible assets	-1,460,587	-1,460,587	-2,611,783
Other transient adjustments to common equity tier 1	-	-	19,905,862
EQUITY TIER 2	106,210,749	106,210,749	114,850,555
TOTAL EQUITY	1,851,264,347	1,630,594,804	1,554,611,617
Own funds requirements, of which	6,704,125,163	6,703,743,571	6,911,315,386
Credit risk	5,967,896,613	5,967,515,021	5,634,526,748
Market risk	-	-	-
Operational risk	736,228,550	736,228,550	1,276,788,638
CET1 ratio	26.03%	22.74%	20.83%
Equity tier 1 ratio	26.03%	22.74%	20.83%
Total equity ratio	27.61%	24.32%	22.49%
Leverage ratio	12.01%	10.49%	10.91%

4. FINANCIAL RISK MANAGEMENT (CONTINUED)**d. Capital management (continued)**

In the Solvency calculation above (December 2025 – no audited profit), the National Bank of Romania imposes the grouping of capital elements as follows:

- Retained earnings - the interim profit as of June 2025 in the amount of 103,378,580 RON approved by the NBR adjusted with the retained earnings from previous years and with the income tax on profit of 16% on the retained earnings resulting from the transition to IFRS 9. The total net value of the adjustment of the net profit with the retained earnings is 547,012,439 RON (-7,630,380 RON + 554,642,819 RON).
- Other components of comprehensive income include the legal reserves less the current year allocation to the legal reserve and the reserves for credit risk.
- The line item Other Reserves includes other reserves from profit and Other Reserves for the property, plant and equipment fund.

The value of the retained earnings resulting from the transition to IFRS 9 is 47,689,876 RON, and the related tax that is prudently deducted in the solvency calculation is 7,630,380 RON, this also being the difference between total equity taken into account in the solvency calculation and the accounting equity.

In the Solvency calculation above (Dec 2025- Estimated after the audit and approval of the financial statements) the National Bank of Romania requires the grouping of capital elements as follows:

- Retained earnings - the profit of the year 2025 in the amount of 324,048,123 RON adjusted with the retained earnings from previous years and with the tax of 16% on the retained earnings resulting from the transition to IFRS 9. The total net value of the adjustment of the net profit with the retained earnings is 547,012,439 RON (-7,630,380 RON+ 554,642,819 RON).
- Other components of comprehensive income include the legal reserves less the current year allocation to the legal reserve and the reserves for credit risk.
- The line item Other Reserves includes other Reserves from profit and Other Reserves for the property, plant and equipment fund.

Other risks management**Taxation risk**

Romanian tax legislation provides detailed and complex rules and has undergone various amendments in recent years. The interpretation of the text and of the procedures for the practical application of the tax legislation may vary and there is a risk that certain transactions, for example, may be viewed differently by the tax authorities compared with the Bank's treatment.

The Government of Romania has a number of agencies that are authorized to carry out audits of companies operating in Romania. These audits are similar in nature to tax audits performed by the tax authorities in many countries, but may extend not only to tax matters, but also to other legal and regulatory aspects in which the relevant agency may be interested. It is likely that the Bank will continue to be subject to periodic inspections as new laws and regulations are issued.

Operational risk

In the case of an increase or decrease of net banking income by +/- 10%, the impact on capital requirements is calculated below:

In RON	31 December 2025		31 December 2024	
	+10%	-10%	+10%	-10%
Capital requirement for operational risk sensitive to net banking income	4,827,400	-4,827,400	4,490,658	-4,490,658

5. USE OF ESTIMATES AND JUDGMENTS

The Bank makes estimates and assumptions that affect the amounts of assets and liabilities reported in the next financial year. Estimates and judgments are evaluated continuously and are based on historical experience and on other factors, including expectations of future events that are considered reasonable under the circumstances.

Impairment losses on loans and advances

The Bank assesses and measures credit risk on all credit exposures. Impairment adjustment measurements are based on the requirements of IFRS 9 and result in the appropriate and timely recognition of ECL, in accordance with the applicable accounting framework. The measurement of ECL takes place at the level of the individual credit exposure and also at the level of the collective portfolio by grouping exposures based on identified common risk characteristics.

Post-model ECL adjustments

In addition to the results obtained from modelling the risk parameters used in the calculation of ECL, the Bank uses additional post-model adjustments ("PMA"). PMAs are used in circumstances where the existing inputs, assumptions and modelling techniques do not capture all relevant risk factors. The emergence of new macroeconomic, microeconomic or political events, together with expected changes in parameters, models or data that are not incorporated into the current parameters, or forward-looking information, are examples of such circumstances.

The current conditions require such adjustments, due to:

- Uncertainty and instability of the macroeconomic environment;
- The increase in interest rates and inflation;
- Low values of the adjusted "R-squared" due to economic conditions.

Accordingly, the PMAs used are:

- For the calculation of the PDs used, two standard deviations were added to the values projected by the models, for all portfolios.

The estimated default rate calculated using the model before PMA + 2 standard deviations calculated from the last 12 historical quarters (data for 3 years).

At the same time, additional multiplication coefficients of the PDs in Stage 2, based on the historical migration rates of exposures from Stage 2 to Stage 3.

The estimation of credit losses takes into account relevant factors and expectations at the reporting date that may affect the ability to collect the remaining cash flows over the life of a group of credit exposures or of a single credit exposure. The Bank considers information that goes beyond historical and current data and takes into account reasonable and supportable forward-looking information, including macroeconomic factors, which are relevant for the exposures that are assessed in accordance with the applicable accounting framework.

Under the general approach, credit risk adjustments are recognized on the basis of either 12-month ECL or lifetime ECL, depending on whether there has been a significant increase in credit risk on the financial instrument since initial recognition. The simplified approach does not require tracking changes in credit risk, but instead requires the recognition of an impairment adjustment based on lifetime ECL from origination.

The total amount of the additional model adjustment for expected credit losses is approximately 56,9 million RON.

The Bank uses the general approach for the loan portfolio and for accounts with banks (low credit risk simplification) and the simplified approach for assets other than loans depending on the quality of the asset; these are classified into 3 stages. Stage 1 includes performing exposures, in Stage 2 exposures with a significant increase in credit risk, and in Stage 3 credit-impaired financial assets. The Bank considers that exposures to banks have a low level of risk (Stage 1) if the external ratings of these exposures at the reporting date fall into the category "investment grade".

5. USE OF ESTIMATES AND JUDGEMENTS (CONTINUED)**Collective assessment**

Exposures in Stages 1 and 2 are subject to collective assessment. For the purpose of determining an allowance for expected losses on a collective basis, financial instruments are grouped based on similar credit risk characteristics, in order to facilitate an analysis that is designed to allow the timely identification of significant increases in credit risk. The loan portfolio has been divided into 6 groups, exposures to banks and the other exposures each having dedicated groups as follows:

- Corporate - Legal entities that are not included in the Professionals or Agriculture categories;
- Agriculture - customers working in the agricultural or related sectors;
- Real estate - Customers that are financed for real estate purposes, defined under the credit policy as loans granted to real estate developers who, following their financing, obtain income either from the sale of buildings or from their rental;
- Retail (individuals) - individual customers;
- Professionals - Customers in the category of liberal professions and other companies without a legal form;
- TAUs (Territorial Administrative Units) – city halls, councils, municipalities, cities, communes.

The Bank monitors that exposures within the groups remain homogeneous with respect to their response to the relevant credit risks and to the characteristics of credit risk. The grouping of exposures is re-analysed and the exposures are re-segmented when there is a significant change in the loan portfolio or changes in the Bank's risk profile.

Stage 1 and Stage 2 ECLs differ because of the maximum residual maturity taken into account: for exposures classified in Stage 1, the 12-month horizon is regarded as a cap, whereas for loans classified in Stage 2, the entire lifetime horizon is considered. Key inputs in the measurement of ECLs include the following variables: probability of default (PD), loss given default (LGD) and exposure at default (EAD). PDs and LGDs are used only in the calculation of Stage 1 and Stage 2 ECLs.

Standalone assessment of impairment losses on loans and advances to customers

The objective of estimating expected credit losses is neither to estimate a worst-case scenario nor to estimate the best-case scenario. Instead, an estimate of expected credit losses reflects the possibility that a credit loss will occur and the possibility that no credit loss will occur, even if the most likely outcome is a credit loss. The estimate of expected credit losses is required to reflect an unbiased and probability-weighted amount, determined by evaluating a range of possible outcomes, without the need for a large number of detailed scenario simulations. Expected credit losses reflect at least three outcomes. The scenarios and the occurrence and probability assigned to each of the scenarios are appropriately supported and documented and reflect the stage of recovery and the recovery strategy at customer level. The scenarios are updated whenever significant developments occur, in order to maintain their relevance. See also the information in Note 3d, 3f and 4a for more information regarding significant judgements related to the impairment of financial assets.

Fair value of financial instruments at FVTPL

The Bank has a small portfolio of shares that are not held for trading, which are measured at fair value through profit or loss. These shares have been valued taking into account:

- Market price for listed companies (Elvila, Swift, Visa);
- Dividend discount model for shares where the companies are not listed but pay annual dividends (Transfond, Biroul de credit).

At 31 December 2025, the bank held a small portfolio of repossessed assets originating from foreclosures, with a total value of 232,302 RON, compared to 613,302 RON at 31 December 2024.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

6. NET INTEREST INCOME

Interest income calculated using the effective interest method in:	2025	2024
Loans and advances to banks	67,777,544	87,982,094
Loans and advances to customers	759,417,590	703,129,449
Investment securities at amortised cost	142,668,334	123,683,999
Total interest income	969,863,468	914,795,542

Interest expenses:	2025	2024
Deposits from other banks	-1,013,919	-1,614,577
Customers deposits and current accounts	-282,578,842	-277,119,187
Interest on loans from financial institutions	-236,382	-460,330
Debenture loan	-11,631,980	-11,387,977
Interest on subordinated loan	-5,880,401	-3,682,168
Lease interest	-2,281,572	-2,269,379
Total interest expenses	-303,623,096	-296,533,618
Net interest income	666,240,372	618,261,924

The interest income presented above is explained in the same way in both the individual and the separate financial statements. The interest income related to loans and advances granted to customers includes 25,827,000 RON (2024: 24,372,591 RON), representing interest income on impaired loans.

7. NET FEE AND COMMISSION INCOME

<i>In RON</i>	2025	2024
Commission from collections and payments from customers operations	39,366,465	45,975,763
Commission from ATM and card transactions	89,759,611	77,122,540
Other commissions	326,606	589,789
Total commissions from contracts with customers	129,452,682	123,688,092
Commissions related to lending business	21,860,175	25,991,751
Total commission income	151,312,857	149,679,843
Commission expenses		
Expenses with commissions from interbank operations	-7,148,971	-17,999,502
Expenses related to payment operations	-56,069,018	-47,555,342
Other commissions	-1,293,392	-466,384
Total commission expenses	-64,511,381	-66,021,228
Net fee commission income	86,801,476	83,658,615

Fee and commission income represents revenue from contracts with customers and is accounted for in accordance with IFRS 15. The revenue recognized from contracts with customers arises from the following categories:

- Fees related to means of payment: these fees are charged when the transaction takes place. They are included in this category all fees that relate to direct debit arrangements, payment orders and other means of payment;
- Fees based on transactions (for example: cash withdrawal at the counter, payment orders etc.) The fees are collected immediately after the transaction or monthly. This fee is set as a percentage of the transaction, having a fixed minimum amount.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

7. NET FEE AND COMMISSION INCOME (CONTINUED)

Collections and payment fees of customers: they apply to a wide range of standard banking services, related services (SMS alerts, internet banking, monthly administration fee, opening of current accounts, escrow accounts, significant guarantee accounts and closing accounts etc.). These are considered one-off fees relating to a specific service that is provided by the Bank; therefore, they are recognized when the service is provided, but they may also be charged monthly for the services provided in the previous month.

The Bank has not presented information on the allocation of the transaction price to the remaining performance obligations in contracts, and this is due to the fact that the contractual periods are usually less than one year.

Fees from loan commitments and letters of guarantee issued: although the fee income from financial guaranteed contracts and loan commitments is recognized in accordance with the principles of IFRS 15, the financial guarantee contract falls within the scope of IFRS 9 and the fee income arising from it does not represent revenue from contracts with customers. The Bank presents the fee income from financial guarantees as part of total fee income. Fees for financial and credit guarantees are amortized on a straight-line basis over the life of the instruments.

The fee and commission income presented above is explained in the same way in both the individual financial statements and the separate ones.

8. NET GAINS FROM FOREIGN EXCHANGE TRANSACTIONS AND REVALUATION

<i>In RON</i>	2025	2024
Gain/(Loss) from foreign exchange transactions	72,475,002	54,107,998
Gain/(Loss) from revaluation	-109,732	-42,003
Total net gains from foreign exchange transactions and revaluation	72,365,270	54,065,995

9. OTHER OPERATING INCOME

<i>In RON</i>	2025	2024
Dividend income	1,881,698	1,456,207
Income from insurance policies	3,831,491	3,526,040
Income from penalties	503,779	33,020
Net gains from sale of tangible and intangible assets	379,193	215,382
Other income	2,518,262	1,808,472
Total other operating income	9,114,424	7,039,121

Dividend income arises from investments accounted for at fair value through profit and loss and their structure is presented in the table below:

<i>In RON</i>	2025	2024
Dividends from Visa	82,652	66,954
Dividends from Transfond	1,779,428	1,372,078
Dividends from Credit Office	19,619	17,175
Total dividend income	1,881,698	1,456,207

10. OPERATING EXPENSES

<i>In RON</i>	2025	2024
Personnel expenses(i)	-288,061,566	-233,341,771
Professional fees, rent and insurance	-52,921,858	-43,746,544
Repairs, maintenance and utilities	-8,000,470	-7,567,993
Other taxes	-58,579,240	-40,921,215
Amortisation and depreciation expenses(ii)	-20,187,146	-19,059,171
Other expenses for services rendered(v)	-6,144,874	-5,219,235
Net loss from sale of repossessed assets (iii)	-682,000	-467,335
Other expenses with third parties	-5,015,602	-5,511,691
Other provisions (Note 23)	-5,303,179	-5,889,413
Other expenses (iv)	-9,258,151	-8,596,233
Total operating expenses	-454,154,086	-370,320,601

- (i) The Bank had 1,386 employees as at 31 December 2025 and 1,314 employees as at 31 December 2024. The average number of employees was 1,346 as at 31 December 2025 and 1,200 as at 31 December 2024.

	31 December 2025		31 December 2024	
	Number of employees	Salary costs	Number of employees	Salary costs
<i>In RON</i>				
Operating personnel	1,229	-212,353,522	1,146	-168,331,949
Management personnel	157	-75,708,044	168	-65,009,822
Total	1,386	-288,061,566	1,314	-233,341,771

- (ii) The amortization and depreciation expenses of tangible and intangible assets also include the amortisation of right-of-use assets for operating lease and rental agreements, which is presented in the table below:

<i>In RON</i>	2025	2024
Amortization and depreciation expenses for tangible and intangible assets	-4,944,588	-4,061,016
Amortisation expenses for car leases	-1,269,938	-1,489,338
Amortisation expenses for land and building leases	-13,972,620	-13,508,817
Total amortization and depreciation expenses	-20,187,146	-19,059,171

- (iii) In 2025 there were sales of repossessed assets. The apartment on Colentina Road, with a value of 381,000 RON, as well as the property in Ploiești, with a value of 301,000 RON, were sold.
- (iv) In the year 2025 other operating expenses presented above In the amount of 8,916,437 RON represented the Bank's sponsorships to support non-profit entities with no profit purpose, for which tax facilities were available.
- (v) Expenses representing audit services and non-audit services provided by audit and consultancy companies in 2025 amounted to the amount of 2,135 thousand RON, compared to 1,925 thousand Romanian RON in 2024.

Of this total 1,033 thousand RON were statutory audit services, 186,9 thousand RON non-statutory audit and 915,1 thousand RON other services of consultancy. In the year 2024 statutory audit services amounted to 517,34 thousand RON, other audit services amounted to 842,3 thousand RON.

11. IMPAIRMENT LOSSES ON FINANCIAL INSTRUMENTS

<i>In RON</i>	2025	2024
Net charge/(release) of expected losses for loans and advances granted to banks	76,878	-80,752
Net charge of expected losses for investment securities	-367,379	-2,799,497
Net charge of expected losses for loans and advances to customers	-51,316,259	-109,405,550
Revenues from loans previously written-off	48,786,617	34,512,220
Total impairment loss on financial instruments	-2,820,144	-77,773,579

The movement in the accounts of expected losses is presented below:

<i>In RON</i>	Expected losses for nostro accounts	Expected losses for investment securities	Expected losses for loans and advances to customers	Total
1 January 2024	326,112	240,077	214,766,928	215,333,117
Net impairment expense/(income)	80,752	2,799,497	109,405,550	112,285,799
Expected losses of loans written off	-	-	-73,541,490	-73,541,490
E/R differences	1,475	-	174,891	176,366
Adjustment of interest income	-	-	1,908,242	1,908,242
31 December 2024	408,339	3,039,574	252,714,120	256,162,033
Net impairment expense/(income)	-76,878	367,379	51,316,259	51,606,760
Expected losses of loans written off	-	-	-14,570,109	-14,570,109
E/R differences	3,369	9,527	2,563,630	2,576,526
Adjustment of interest income	-	-	2,963,378	2,963,378
31 December 2025	334,830	3,416,480	294,987,277	298,738,587

12. INCOME TAX EXPENSE

Income tax includes:

<i>In RON</i>	2025	2024
Current tax	-56,699,910	-49,446,746
Deferred tax	885,503	1,458,152
Total income tax expense	-55,814,406	-47,988,593

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

12. INCOME TAX EXPENSE (CONTINUED)

Reconciliation between the income tax expense and the product of gross profit and the applicable tax rate is presented below:

	2025	2024
Gross profit before tax	379,862,529	318,210,440
Taxation at statutory rate of 16%	60,778,005	50,913,670
Non-deductible expenses	20,209,702	18,944,677
Non-taxable revenues	-15,371,361	-12,132,031
Adjustments of income tax recognized in the current period relating to prior periods (i)	-	-
Deferred income (expense)/income	-885,503	-1,458,152
Corporate income tax before fiscal credit	64,730,843	56,268,168
Fiscal credit from sponsorship and fiscal credit	-8,916,437	-8,279,575
Total income tax expense	55,814,406	47,988,593

(i) The main non-taxable income arises from the reversal of non-deductible provisions and from dividends received. The main non-deductible expenses arise from provisions and other non-deductible expenses in accordance with the Fiscal Code.

The main sources of tax recognition of temporary differences are presented below:

In RON	2025	2024
Taxable/(deductible) temporary differences:		
Operational provisions	-54,715,813	-49,133,897
Tangible and intangible assets	-788,777	-836,298
Total temporary differences	-55,504,590	-49,970,195
Deferred tax assets at 16%	-8,880,734	-7,995,231

Provisions that are not deductible and that give rise to deferred taxes mainly include provisions for litigations, provisions for undrawn credit commitments and financial guarantees and other operational provisions (see Note 23).

For the associate LIBRA DEVELOPMENT IFN as at 31.12.2025 no impairment provisions were set up and the investment in this associate did not generate temporary differences, the associate generating a profit during the year 2025.

The change in deferred tax is presented in the table below:

In RON	2024	Charge in 2024 or reversal to reserves	2025
Provisions	-7,861,423	-893,107	-8,754,530
Tangible and intangible assets	-133,808	7,604	-126,204
Total	-7,995,231	-885,503	-8,880,734

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

13. FINANCIAL ASSETS AND FINANCIAL LIABILITIES

(i) Classification of financial assets and liabilities

The Bank classifies financial assets according to its business model and the characteristics of the contractual cash flows of the financial asset. The business model of the Bank is to collect contractual cash flows.

Financial assets or financial liabilities held in order to collect cash flows, by collecting contractual payments over the life of the instrument (includes assets such as loans, government securities and bonds that are not held for trading) are measured at amortised cost if these assets/liabilities also meet the criterion that the cash flows represent solely payments of principal and interest (the SPPI test). These assets are included in the periodic calculation of expected loss allowances.

Financial assets and financial liabilities measured at fair value through profit or loss are those financial assets/liabilities that do not meet the criterion that the cash flows are solely payments of principal and interest or if they are held for trading. The Bank does not hold a trading portfolio and in this category includes only its minority interests in other entities.

The remaining financial assets that are not classified at amortized cost or at fair value through profit and loss are measured at cost.

The associate Libra Development IFN is measured at cost in the separate financial statements and by the equity method in the individual financial statements.

The table below presents the measurement categories for financial instruments (in the Separate Financial Statements):

31 December 2025	At market value FVTPL	At amortized cost	At cost	Total carrying amount	Total fair value
Assets					
Cash and cash equivalents	-	2,899,369,228	-	2,899,369,228	2,899,369,228
Financial assets at fair value through profit or loss	21,374,485	-	-	21,374,485	21,374,485
Loans and advances to customers	-	8,398,579,405	-	8,398,579,405	8,469,751,864
Investment securities at amortized cost	-	2,357,090,250	-	2,357,090,250	2,388,603,240
Investment in associates	-	-	14,558,512	14,558,512	14,558,512
Assets held for sale	-	-	232,302	232,302	232,302
Property, plant and equipment	-	-	44,105,909	44,105,909	44,105,909
Intangible assets	-	-	1,460,587	1,460,587	1,460,587
Current tax assets	-	-	-	-	-
Deferred tax assets	-	-	8,880,734	8,880,734	8,880,734
Other assets	-	124,557,189	36,932,766	161,489,956	161,489,956
Total assets	21,374,485	13,779,596,072	106,170,810	13,907,141,368	14,009,826,817
Liabilities					
Deposits from customers	-	11,671,054,227	-	11,671,054,227	11,456,821,619
Deposits from other banks	-	1,936,730	-	1,936,730	1,936,730
Loans from financial institutions	-	8,259,261	-	8,259,261	8,259,261
Bonds issued	-	249,138,016	-	249,138,016	249,138,016
Loan subordinated	-	76,217,279	-	76,217,279	76,217,279
Provisions	-	3,573,162	47,368,177	50,941,339	50,941,339
Current tax liabilities	-	-	5,077,510	5,077,510	5,077,510
Other liabilities	-	43,369,212	42,213,542	85,582,754	85,582,754
Total liabilities	-	12,053,547,888	94,659,230	12,148,207,118	11,933,974,509

For comparability, the following were included in the table above and asset items d liabilities that are not classified as financial instruments in order to reconcile the presentation with the Statement of financial position.

13. FINANCIAL ASSETS AND LIABILITIES (CONTINUED)

(i) Classification of financial assets and liabilities (continued)

31 December 2024	At fair value through profit or loss FVTPL	At amortised cost	At cost	Total carrying amount	Total fair value
Assets					
Cash and cash equivalents	-	3,332,207,029	-	3,332,207,029	3,332,207,029
Financial assets at fair value through profit or loss	20,453,208	-	-	20,453,208	20,453,208
Loans and advances to customers	-	7,196,501,880	-	7,196,501,880	7,333,523,888
Investment securities at amortised cost	-	1,967,390,959	-	1,967,390,959	1,983,846,717
Investment in associates	-	-	12,555,767	12,555,767	12,555,767
Assets held for sale	-	-	613,302	613,302	613,302
Property, plant and equipment	-	-	51,341,936	51,341,936	51,341,936
Intangible assets	-	-	2,611,783	2,611,783	2,611,783
Current tax assets	-	-	5,055,830	5,055,830	5,055,830
Deferred tax assets	-	-	7,995,231	7,995,231	7,995,231
Other assets	-	124,557,189	36,932,767	161,489,956	161,489,956
Total assets	20,453,208	12,585,776,126	111,180,051	12,717,409,385	12,870,887,151
Liabilities					
Deposits from customers	-	10,827,475,936	-	10,827,475,936	10,647,665,188
Deposits from other banks	-	853,213	-	853,213	853,213
Loans from financial institutions	-	6,260,852	-	6,260,852	6,260,852
Bonds issued	-	242,558,835	-	242,558,835	242,558,835
Subordinated loan	-	74,259,371	-	74,259,371	74,259,371
Provisions	-	5,401,808	40,260,951	45,662,759	45,662,759
Current tax liabilities	-	-	-	-	-
Other liabilities	-	50,781,683	36,673,353	87,455,036	87,455,036
Total liabilities	-	11,207,591,698	76,934,304	11,284,526,002	11,717,754,227

For comparability, there have been included in the table above and asset items and liabilities that are not classified as financial instruments in order to reconcile the presentation with the statement of financial position.

(ii) Cash and cash equivalents

Cash and cash equivalents comprise cash on hand, current accounts with banks, placements with banks with an initial maturity of less than 3 months, the current account with the National Bank of Romania and cash held in EURONET ATMs.

In RON	31 December 2025	31 December 2024
Cash on hand	61,953,218	89,282,554
Loans and advances to banks, of which	916,127,309	959,943,957
<i>Nostro accounts with banks</i>	116,210,641	105,105,955
<i>Term deposits with banks</i>	799,916,669	854,838,002
Current account with NBR	1,921,623,531	2,282,980,518
Cash in EURONET ATMs (Note 15)	34,295,815	25,048,533
Total Gross	2,933,999,874	3,357,255,561
Expected losses for loans and advances to banks	-334,830	-408,339
Total Net	2,933,665,044	3,356,847,222

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

13. FINANCIAL ASSETS AND LIABILITIES (CONTINUED)

(iii) Cash from financing activities (continued)

The net cash from financing activity for the year 2025 is presented in the table below:

In RON	Net cash from financing activity for the year 2025					Balance as at 31 December 2025
	Balance as at 1 January 2025	Drawdowns / Collections	Repayments / Payments*	Accrued interest	Other changes**	
Loans from banks and other financial institutions at amortised cost	6,260,852	5,098,500	-3,496,135	236,382	159,662	8,259,261
Bonds issued	242,558,835	-	-11,295,558	11,631,980	6,242,759	249,138,016
Subordinated loan	74,259,371	-	-5,849,298	5,880,401	1,926,805	76,217,279
Lease liabilities	50,781,683	890,519	-19,510,065	2,281,572	8,925,503	43,369,212
Total	373,860,741	5,989,019	-40,151,057	20,030,335	17,254,729	376,983,767

(*) The repayments/payments also include the interest paid

(**) Other changes are represented by the effect of the exchange rate on the remeasurement of the balances, by the amounts to be amortised and by the effect of the new lease agreements signed/extended during the year 2025.

The net cash from financing activities for the year 2024 is presented in the table below:

In RON	Net cash from financing activities for the year 2024					Balance at 31 December 2024
	Balance at 1 January 2024	Drawdowns / Collections	Repayments / Payments*	Accrued interest	Other changes**	
Loans from banks and other financial institutions at amortised cost	9,413,200	-	-3,610,006	460,330	-2,673	6,260,852
Bonds issued	242,122,561	-	-11,050,515	11,387,977	98,811	242,558,835
Subordinated loan	39,618,772	34,818,700	-4,005,662	3,682,168	145,392	74,259,371
Lease liabilities	53,034,433	-	-17,643,475	2,269,379	13,121,346	50,781,683
Total	344,188,966	34,818,700	-36,309,658	17,799,855	13,362,877	373,860,741

(*) Repayments/payments include the interest paid

(**) Other changes are represented by the effect of the exchange rate on the revaluation of balances, by the amounts to be amortized and by the effect of the new lease contracts signed/extended during 2025.

At 31 December 2025 and 2024, term deposits with banks included deposits with banks in Romania in RON, EUR and USD with remaining maturities of up to 1 month.

At 31 December 2025 and 2024, interest rates on term deposits with banks were as follows:

Original currency	31 December 2025	31 December 2024
EUR	0.4% - 3.60%	0.4% - 3.60%
RON	0.4% - 3.85%	0.4% - 3.85%
USD	1.25% - 8%	1.25% - 8%

13. FINANCIAL ASSETS AND LIABILITIES (CONTINUED)**(iv) Current account with the National Bank of Romania**

Current accounts with the National Bank of Romania in amount of RON 1,921,623,531 (31 December 2024: 2,282,290,518) include balances in RON, USD and EUR and are used for domestic payments (Settlement account Target 2) and for maintaining minimum mandatory reserves (RMO).

The structure of the Loans and advances to National Bank of Romania are presented in the table below

	31 December 2025	31 December 2024
Current account with NBR for RMO (RON)	1,482,079,611	556,402,730
Sight deposits at NBR	-	900,137,500
Current account with NBR for RMO (foreign currency)	391,641,898	491,503,058
Settlement Account Target 2	47,902,023	334,937,230
Total current accounts with NBR	1,921,623,531	2,282,980,518

The National Bank of Romania requires commercial banks to maintain an amount calculated as a percentage of their funding, other than local interbank funding originating domestically, in order to achieve the targets of monetary policy. At 31 December 2025, the required rate for mandatory reserves in RON and in foreign currency was 8% for RON and 6% for foreign currency, while in 2024 it was the same. At 31 December 2025 and 2024, the interest rates on the balances of current accounts at The National Bank of Romania were as follows:

Original currency	31 December 2025	31 December 2024
RON	0.82%	0.78%
USD	0.00%	0.58%
EUR	0.18%	0.14%

14. LOANS AND ADVANCES GRANTED TO CUSTOMERS

<i>In RON</i>	31 December 2025	31 December 2024
Loans and advances to customers	8,693,566,681	7,449,216,001
Provisions for expected credit losses (Note 11)	-294,987,277	-252,714,120
Total	8,398,579,405	7,196,501,880

At 31 December 2025 and 2024, the interest rates on loans were as follows:

Original currency	31 December 2025	31 December 2024
RON	0% - 24.09%	0% - 22.9%
USD	0% - 13.9%	0% - 14.3%
EUR	0% - 9%	0% - 9.6%

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

15. OTHER ASSETS

The tables below present the breakdown of other assets by nature and quality:

<i>In RON</i>	31 December 2025	31 December 2024
Prepayments	7,846,310	7,256,888
Cash in transit (from ATM network supplier)	34,295,815	25,048,533
Warranty deposits paid	38,359,202	39,800,255
Suspense accounts	51,902,172	25,011,865
Sundry debtors	24,093,906	11,861,737
Interest receivable for subsidies	4,992,551	11,703,182
Total	161,489,956	120,682,460

The table below presents the breakdown of other assets by quality:

<i>In RON</i>	31 December 2025	31 December 2024
Financial assets	94,965,206	89,676,258
Non-financial assets	66,524,751	31,006,202
Total	161,489,956	120,682,460

Suspense accounts include suspense amounts recoverable in the form of cash, checks and promissory notes, from the card activity and sundry debtors.

<i>In RON</i>	31 December 2025	31 December 2024
Other current assets	122,449,223	79,188,976
Other non-current assets	39,040,733	41,493,483
Total	161,489,956	120,682,460

16. INVESTMENTS

<i>In RON</i>	31 December 2025	31 December 2024
Financial assets amortized cost		
Government securities at amortised cost	2,167,547,384	1,806,005,120
Debt securities at CEC Bank	-	-
Debt securities at municipalities	192,959,345	164,425,413
Allowance for expected credit losses	-3,416,480	-3,039,574
Financial assets at amortised cost (net)	2,357,090,250	1,967,390,959
Financial assets fair value through P&L		
Total financial assets at fair value through profit or loss	21,374,485	20,453,208
Financial assets at cost		
Investment in associate (separate financial statements)	9,800,000	9,800,000
Total investments in financial assets	2,388,264,735	1,997,644,167

16. INVESTMENTS (CONTINUED)

As at 31 December 2025, the investments include government bonds denominated in RON and euro with yields between (3.9% - 9.2%) p.a. for RON and (0.81% - 4.3%) p.a. for euro. The portfolio also includes municipal bonds denominated in Romanian RON, with an average yield of 8.78%, and municipal bonds denominated in euro, with a yield of 5.4%.

Additionally, investments of the Bank include also a share portfolio of 21,374,485 RON measured at fair value through profit or loss and an associate in the amount of 9,800,000 RON carried at cost in the separate financial statements and using the equity method in the individual financial statements.

As at 31 December 2025 a portion of the government bond portfolio with a nominal value of 67,209,071 RON (31 December 2024: 56,896,523 RON) is pledged in favour of the National Bank of Romania.

The details regarding equity instruments are as follows:

Investments in minority interests classified at fair value through profit and loss

Company name	Business	Place of establishment	Ownership	Carrying amount (RON)	
				31 December 2025	31 December 2024
Transfond SA	Money transfers	Romania	2.56%	6,574,237	5,655,758
Biroul de Credit	Bank information services	Romania	0.18%	160,046	170,740
SWIFT	Money transfers	Belgium	34 shares	1,393,726	1,359,720
Elvila S.A.	Furniture, trade and production	Romania	1.88%	259,915	334,890
Visa		USA	650 preferred shares type C and 81 preferred shares type A	12,986,561	12,932,100
Total securities at fair value				21,374,485	20,453,208

17. INVESTMENT IN ASSOCIATES

In the year 2020, the Bank invested in its associate LIBRA DEVELOPMENT IFN the amount of 7,840,000 RON in the form of a contribution to the share capital of the company, with a stake of 49%. During 2023 the Bank further contributed the amount of 1,960,000 RON within the capital increase carried out by the associate in order to maintain the 49% holding. The total value of the investment in the associate Libra Development IFN is 9,800,000RON. LIBRA Development IFN S.A. is a non-banking financial institution, established on 14.07.2020, under the supervision of the National Bank of Romania, whose business object is granting loans. The registered office of the associate LIBRA DEVELOPMENT IFN is in Bucharest. Calea Vitan 6-6A, 4th floor, Romania.

Name of shareholder	Business	Place of establishment	Ownership and voting right	
			31 December 2025	31 December 2024
Libra Development IFN	Lending	Romania, Bucharest	49%	49%
Net assets of shareholder (not audited)			29,711,248	25,624,015
Bank's ownership in shareholder			49%	49%
Value of ownership in shareholder (capital method)			14,558,512	12,555,767

17. INVESTMENT IN ASSOCIATES (CONTINUED)

The unaudited financial position of the associate Libra development IFN is presented in the tables below:

Statement of profit or loss	31 December 2025	31 December 2024
Interest revenue	15,983,267	16,232,630
Interest expenses	-7,034,055	-7,828,498
Net interest income	8,949,212	8,404,132
Commission income	786,613	470,382
Commission expenses	-173,589	-190,876
Net commission income	613,024	279,506
Net impairment on financial assets and commitments	-246,705	-641,387
Other operating income	10,955	-
Net operating income	9,326,486	8,067,771
Personnel expenses	-3,314,864	-2,960,525
Amortization expenses	-287,371	-329,538
Other operating expenses	-1,050,608	-776,564
FX differences	40,743	-8,419
Total operating expenses	-4,612,100	-4,075,047
Profit/(loss) before taxation	4,714,386	3,967,205
(Expense)/Income with income tax	-627,153	-509,362
Net profit/(loss) for the financial year	4,087,233	3,457,843

Statement of Financial Position	31 December 2025	31 December 2024
Cash and cash equivalents	5,940,897	6,510,420
Loans and advances to customers	91,172,918	107,059,763
Net receivables from finance leases	4,393,991	314,165
Property plant and equipment	418,112	616,231
Intangible assets	123,762	160,515
Deferred tax assets	38,319	12,334
Other assets	940,423	242,462
Total assets	103,028,422	114,915,890
Equity and liabilities		
Financial liabilities		
Borrowings from banks	60,793,125	81,832,878
Other borrowings	5,038,304	
Lease liabilities	496,447	680,962
Current tax payables	77,330	63,669
Subordinated term loan	6,046,984	6,045,455
Other liabilities	857,398	665,263
Provisions	7,586	3,648
Total liabilities	73,317,174	89,291,875
Equity		
Share capital	20,000,000	20,000,000
Other reserves	604,378	368,659
Retained earnings	9,106,870	5,255,356
Total equity	29,711,248	25,624,015
Total equity and liabilities	103,028,422	114,915,890

18. PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS

a) Property, plant and equipment

COST						
<i>In RON</i>	Land and buildings	Office equipment	Vehicles	Fixed assets in progress	Right-of-use assets	Total
At 31 December 2022	7,918,111	16,475,833	4,465,493	1,235,860	75,865,414	105,960,711
Additions	284,530	2,762,468	-	2,652,855	3,742,933	9,442,786
Disposals / Transfers	-61,908	-866,708	-1,925,670	-3,167,128	6,691,488	670,074
At 31 December 2023	8,140,733	18,371,593	2,539,823	721,587	86,299,835	116,073,571
Additions	227,884	2,046,015	363,676	3,296,459	2,957,433	8,891,468
Disposals/ Changes		-1,116,456	-506,722	-2,649,923	3,201,305	-1,071,796
At 31 December 2024	8,368,617	19,301,153	2,396,778	1,368,124	92,458,572	123,893,244
Additions	100,531	4,433,959	671,775	4,197,453	886,415	10,290,133
Disposals/ Changes	-16,620	-611,164	-1,000,614	-5,206,265	-2,211,326	-9,045,989
At 31 December 2025	8,452,528	23,123,948	2,067,939	359,311	91,133,661	125,137,387

ACCUMULATED DEPRECIATION AND AMORTIZATION						
<i>In RON</i>	Land and buildings	Office equipment	Vehicles	Fixed assets in progress	Right-of-use assets	Total
At 31 December 2022	-5,898,203	-13,449,519	-4,198,508	-	-32,720,002	-56,266,232
Charge for the year	-345,786	-1,867,802	-230,593	-	-14,287,126	-16,731,307
Disposals/ Changes	61,908	865,037	1,925,670	-	7,494,370	10,346,985
At 31 December 2023	-6,182,081	-14,452,284	-2,503,431	-	-39,512,878	-62,650,554
Charge for the year	-333,791	-1,975,058	-59,165	-	-14,998,155	-17,366,169
Disposals/ Changes	-	1,377,316	243,080	-	5,845,015	7,465,411
At 31 December 2024	-6,515,872	-15,050,026	-2,319,516	-	-48,666,018	-72,551,308
Expenses during the year	-339,143	-2,653,191	-147,430	-	-15,242,559	-18,382,323
Disposals/Changes	16,620	608,012	1,000,614	-	8,276,907	9,902,153
At 31 December 2025	-6,838,271	-17,095,204	-1,466,332	-	-55,631,671	-81,031,478

NET BOOK VALUE OF PROPERTY, PLANT AND EQUIPMENT						
<i>In RON</i>	Land and buildings	Office equipment	Vehicles	Fixed assets in progress	Right-of-use assets	Total
At 31 December 2023	1,958,652	3,919,309	36,392	721,586	46,787,077	53,423,017
At 31 December 2024	1,852,870	4,251,127	77,262	1,368,123	43,792,553	51,341,936
At 31 December 2025	1,614,257	6,028,744	601,607	359,311	35,501,990	44,105,909

18. PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS (continued)

b) Intangible assets

<i>In RON</i>	Intangible assets	Intangible assets in progress	Total
COST			
At 31 December 2022	22,257,389	1,835,223	24,092,612
Additions	3,057,521	1,511,241	4,568,762
Disposals	-	-3,064,975	-3,064,975
At 31 December 2023	25,314,910	281,489	25,596,399
Additions	1,257,875	1,018,874	2,276,749
Disposals	-408,606	-1,257,875	-1,666,481
At 31 December 2024	26,164,179	42,488	26,206,667
Additions	580,741	653,627	1,234,368
Disposals	-11,376	-580,741	-592,117
At 31 December 2025	26,733,544	115,374	26,848,918
ACCUMULATED DEPRECIATION AND AMORTIZATION			
At 31 December 2022	-21,032,888	-	-21,032,888
Charge for the year	-1,277,600	-	-1,277,600
Disposals	-	-	-
At 31 December 2023	-22,310,488	-	-22,310,488
Charge for the year	-1,693,002	-	1,693,002
Disposals	408,606	-	408,606
At 31 December 2024	-23,594,884	-	-23,594,884
Charge for the year	-1,804,823	-	-1,804,823
Disposals	11,376	-	11,376
At 31 December 2025	-25,388,331	-	-25,388,331
NET BOOK VALUE			
At 31 December 2023	3,004,422	281,489	3,285,911
At 31 December 2024	2,569,295	42,488	2,611,783
At 31 December 2025	1,345,213	115,374	1,460,587

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

18. TANGIBLE AND INTANGIBLE ASSETS (CONTINUED)

The tables below present the movement of the right-of-use assets related to lease contracts that are subject to IFRS 16, in the year 2024:

RON	Vehicles	Land and buildings	Total
Gross balance at 1 January 2025	4,063,717	88,394,855	92,458,572
New contracts	886,415	-	886,415
Contract amendments	-1,794,996	-416,330	-2,211,326
Gross balance as at 31.12.2025	3,155,136	87,978,525	91,133,661
Accumulated amortization as at 01.01.2025	-2,269,211	-46,396,807	-48,666,018
Contract amendments	1,826,898	6,450,009	8,276,907
Depreciation during the period (-)	-1,269,938	-13,972,621	-15,242,559
Net balance as at 31.12.2025	1,442,885	34,059,106	35,501,990

The tables below present the movement of the right-of-use assets related to lease contracts subject to IFRS 16 in the year 2024:

RON	Vehicles	Land and buildings	Total
Gross balance as at 1 January 2024	4,055,266	82,244,568	86,299,835
New contracts	653,177	2,304,256	2,957,433
Contractual amendments	-644,726	3,846,031	3,201,305
Gross balance as at 31.12.2024	4,063,717	88,394,855	92,458,572
Accumulated amortization as at 01.01.2024	-1,422,165	-38,090,593	-39,512,758
Contractual amendments	642,292	5,202,603	5,844,895
Depreciation during the period (-)	-1,489,338	-13,508,817	-14,998,155
Net balance as at 31.12.2024	1,794,506	41,998,048	43,792,554

19. ASSETS HELD FOR SALE

At 31 December 2025 the bank had in its portfolio a repossessed asset resulting from as a result of the foreclosure process in the amount of 232,302 RON .

In RON	31 December 2025	31 December 2024
Building with land in Bihor County	232,302	232,302
Apartment Bucharest Sos.Colentina		381,000
Balance at 31 December	232,302	613,302

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

20. DEPOSITS FROM BANKS

	31 December 2025		
<i>In RON</i>	RON	Other currencies	Total
LORO accounts	1,936,730	-	1,936,730
Total	1,936,730	-	1,936,730

	31 December 2024		
<i>In RON</i>	RON	Other currencies	Total
LORO accounts	853,213	-	853,213
Total	853,213	-	853,213

21. DEPOSITS FROM CUSTOMERS

	31 December 2025		
<i>In RON</i>	RON	Other currencies	Total
On demand	3,234,656,978	1,050,092,665	4,284,749,643
Term deposits	4,914,355,485	2,471,949,100	7,386,304,585
Total	8,149,012,463	3,522,041,765	11,671,054,227

	31 December 2024		
<i>In RON</i>	In RON	Other currencies	Total
On demand	3,254,912,391	1,024,831,735	4,279,744,127
Term deposits	4,477,607,917	2,070,123,890	6,547,731,809
Total	7,732,520,308	3,094,955,626	10,827,475,936

At 31 December 2025 and 2024 the interest rates on term deposits were as follows:

Initial currency	31 December 2025	31 December 2024
RON	1.75% - 8%	0% - 8%
EURO	0.10% - 3.50%	0% - 3.60%
USD	0.40%-3.60%	0%-3.85%

At 31 December 2025 the interest payable on current account balances were between 0% - 4.89% p.a. for current accounts in RON. 0%-2.5% p.a. for current accounts in euro and 0%- p.a. for current accounts in USD

The Bank had significant balances held by the entities – members of Broadhurst Group NCH, the ultimate shareholder, for current accounts and term deposits in the amount of 429,278,664 RON at 31 December 2025 and 314,927,961 RON at 31 December 2024. At 31 December 2025 the amount exceeded 24% of the Bank's equity. The average interest rate on deposits attracted from related parties is 2.47% equivalent in RON.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

22. LOANS FROM FINANCIAL INSTITUTIONS AND BONDS ISSUED

The Bank contracted, at the end of 2025, an MREL loan from an investment fund in Luxembourg, from which the first tranche in the amount of 1,000,000 EUR was drawn.

The Bank contracted a loan subordinated in November 2024 in an amount of 7,000,000 EUR from a naturperson forfor a period of 7 years.

The Bank signed a facility agreement with the European Investment Fund. The amount remaining to be paid in euro at 31.12.2024 was 1,250,000 EUR having an interest rate of 4,902% (1,875,000 EUR with interest of 5,89% at 31 December 2023).

During 2022 was completed successfully a issue of subordinated bonds. registered, dematerialised, unsecured and non-convertible for 10 years in the amount of 4,262,000 EUR with a yield of 6.5% per year.

Also, in 2022 a subordinated loan was also in contracted in the amount of 8,000,000 euro from the EFSE Investment Fund for a period of 7 years with an interest rate of (4.5% +EURIBOR 6M)p.a.

In 2021 the issue of bonds of nominative, dematerialised, unsecured and non-convertible, senior MREL-eligible in nominal value total of 40,000,000 euro over 7 years with an interest rate of 4.25% per year.

In 2020 the issue was successfully completed of bonds subordinated, registered, dematerialised, unsecured and non-convertible. for ten years. in the amount of 4,296,500 EUR over 10 years with an interest rate of 5% per year.

The structure of the loans and bonds issued by the Bank is presented in the table below:

	31 December2025	31 December 2024	Maturity
Loans from FEI	3,202,875	6,260,852	September 2026
Issue of subordinated bonds (in 2020)	21,968,096	21,372,701	March 2030
Issue of senior bonds (in 2021)	205,302,535	199,934,470	September 2028
Issue of subordinated bonds (in 2022)	21,867,386	21,251,664	July 2032
Subordinated loan EFSE (in the year 2022)	40,697,692	39,648,937	September 2029
Subordinated loan (in the year 2024)	35,519,587	34,610,434	November 2031
Loan responsibility Global Micro	5,056,386		December 2025
Total loans and bonds issued	333,614,557	323,079,058	December 2030

The total balance of bonds issued by the bank as at 31 December 2025 is 48,56 million EUR representing the principal.

23. PROVISIONS

<i>In RON</i>	Provisions for credit commitments and guarantees financial granted	Provisions for lawsuits	Other Provisions	Total
At 31 December 2023	5,841,052	968,805	33,051,963	39,861,820
Net expense/(Net income) from provisions	-350,748	-72,095	6,312,256	5,889,413
E/R differences	-88,495	-	21	-88,475
At 31 December 2024	5,401,809	896,710	39,364,240	45,662,759
Net expense/(Net income) with provisions	-1,891,305	33,895	7,073,297	5,215,887
E/R differences	62,658	-	35	62,693
At 31 December 2025	3,573,162	930,605	46,437,572	50,941,339

In the course of the year 2025 other provisions increased by 5,278,580 RON (compared to 6,312,256 RON in 2024) mainly due to planning of the payment of the employees' benefits and Management related to the profit of the year 2025.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

23. PROVISIONS (CONTINUED)

The total of other provisions established in 2025 was 7,073,297 RON, with the following structure: an increase in the provision for unused vacations by 468,157 RON, an increase in the provision for the sales force bonus by 2,402,630 RON and in the provision for the bonus for all staff by 2,167,446 RON. The provision for management increased by 1,332,782 RON, and other operational provisions increased by 1,190,174 RON. For identified staff a reversal of 772,578 RON was recorded, and the difference of 284,147 RON represents additional provisions for other categories of staff.

The granting of bonuses to management is made 50% in cash, payable within one year for the performance achieved in the previous year, and 50% in non-cash form, deferred until at the departure of the member of management from the Bank, but not less than three years. In the case of Libra Internet Bank SA, this deferred non-cash component represents an adjusted portion of the profit earned by the shareholders of the Bank following its sale under certain conditions that are favourable for this sale (exit instruments) and under the conditions contractually agreed with each member of management.

A portion of these other provisions will be reversed during the year 2026, upon the payment of bonus payments, and in the table below they are presented according to the recovery period, where short term is assumed to be less than one year and long term greater than one year.

At 31 December 2025

Provisions	Long term	Short term	Total
Provisions for credit commitments and financial guarantees granted	2,915,841	657,322	3,573,162
Provisions for litigations	930,605	-	930,605
Other provisions	20,992,778	25,444,793	46,437,572
Total	24,839,224	26,102,115	50,941,339

The breakdown of other provisions by recovery period for the year 2024 is presented in the table below:

At 31 December 2024

Provisions	Long term	Short term	Total
Provisions for credit commitments and financial guarantees granted	4,346,864	1,054,945	5,401,809
Provisions for litigations	896,710	-	896,710
Other provisions	26,598,353	12,765,887	39,364,240
Total	31,841,927	13,820,832	45,662,759

24. OTHER LIABILITIES

In RON	31 December 2025			31 December 2024		
	Short term	Long term	Total	Short term	Long term	Total
Social security, payroll and other taxes payable (i)	21,958,372	-	21,958,372	14,777,700	-	14,777,700
Lease liability (ii)	15,470,592	27,898,620	43,369,212	15,176,069	35,605,614	50,781,683
Other creditors	10,326,332	9,928,838	20,255,170	4,031,038	17,864,615	21,895,653
Total	47,755,296	37,827,458	85,582,754	33,984,807	53,470,229	87,455,036

(i) Such expenses include amounts owed to the State budget for social contributions, VAT payable and various employees' salary retainers.

The table below presents the analysis of liabilities by their quality:

In RON	31 December 2025	31 December 2024
Other financial liabilities	43,369,212	50,781,683
Other non-financial liabilities	42,213,542	36,673,353
Total	85,582,754	87,455,036

24. OTHER LIABILITIES (CONTINUED)**(ii) IFRS 16 - Lease contracts (the Bank as lessee)**

The Bank acts as a lessee under lease contracts for vehicles and rental of premises. The lease contracts are denominated in EUR and are entered into for periods between 1 and 5 years.

The tables below present the movements in lease liabilities in the year 2025:

In ORN	Vehicles	Land and buildings	Total
Balance at 1 January 2025	1,876,866	48,904,817	50,781,683
Interest expense	76,390	2,205,182	2,281,572
Lease payments – Principal	-2,147,617	-15,394,539	-17,542,156
Lease payments – Interest	-76,308	-1,891,600	-1,967,908
New leases	841,667	-	841,667
Contract amendments	942,261	8,032,093	8,974,354
Balance at 31 December 2025	1,513,259	41,855,953	43,369,212

The tables below present the movement of lease liabilities in the year 2024:

In RON	Vehicles	Land and buildings	Total
Balance at 1 January 2024	2,918,411	50,116,022	53,034,433
Interest expenses	108,671	2,160,708	2,269,379
Lease payments – Principal	-1,981,394	-13,633,647	-15,615,041
Lease payments – Interest	-107,677	-1,920,757	-2,028,434
New leases	653,176	2,304,256	2,957,432
Contract amendments	285,679	9,878,234	10,163,913
Balance at 31 December 2024	1,876,866	48,904,817	50,781,683

The table below presents the amounts recognized in the Statement of comprehensive income for the positions related to IFRS 16 and for the amounts related to lease contracts not included in the positions under IFRS 16 (short-term lease expenses and lease expenses for low-value assets).

31.12.2025			
In RON	Vehicles	Land and buildings	Total
Expenses with impairment of right of use	1,269,938	13,972,621	15,242,559
Expenses with interest on lease liabilities	76,390	2,205,182	2,281,572
Expenses with short-term rentals in IFRS 16 items	570,254	133,112	703,366
Total	1,916,581	16,472,472	18.227.497
31.12.2024			

In RON	Cars	Land and buildings	Total
Expenses with impairment of right of use	1,489,338	13,508,817	14,998,155
Expenses with interest on lease liabilities	108,670	2,160,709	2,269,379
Expenses with short-term rentals in IFRS 16 items	114,268	133,112	247,380
Total	1,712,276	18,802,638	17,514,914

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

24. OTHER LIABILITIES (CONTINUED)

The table below presents the maturity analysis of the lease liability from lease operations (undiscounted) as at 31 December 2025:

In RON	Vehicles	Land and buildings	Total
Within 3 months	290,535	4,187,619	4,478,154
3 months - 1 year	674,001	11,830,898	12,504,899
1 - 2 years	391,326	14,774,361	15,165,687
2 - 3 years	204,892	9,259,235	9,464,127
More than 3 years	37,827	4,870,088	4,907,915
Total	1,598,581	44,922,201	46,520,782

The table below presents the analysis by maturities of the debt from lease operations (undiscounted) as at 31 December 2024:

In RON	Vehicles	Land and buildings	Total
Within 3 months	368,017	3,978,918	4,346,935
3 months - 1 year	886,566	11,662,514	12,549,080
1 - 2 years	620,866	13,889,534	14,510,400
2 - 3 years	79,096	12,640,727	12,719,823
More than 3 years	-	10,751,859	10,751,859
Total	1,954,545	52,923,552	54,878,097

25. SHARE CAPITAL

In RON	31 December 2025	31 December 2024
Share capital at nominal value	512,622,000	512,622,000
Effect of hyperinflation adjustments up to 31 December 2003	43,549,200	43,549,200
Total share capital	556,171,200	556,171,200

The shareholding structure as at 31 December 2025 and 2024 is as follows:

Shareholder	31 December 2025			31 December 2024		
	No. of shares	Nominal value	%	No. of shares	Nominal value	%
Broadhurst Investments Ltd.	15,536	22,000	66.68%	15,536	22,000	66.68%
Romarta SA	6,423	22,000	27.56%	6,423	22,000	27.56%
Andrei Siminel Cristian	1,335	22,000	5.73%	1,335	22,000	5.73%
Others	7	22,000	0.03%	7	22,000	0.03%
TOTAL	23,301		100%	23,301		100%

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

26. RESERVES AND DIVIDENDS DISTRIBUTED

Other reserves consist of legal reserves, the general risk reserve established in accordance with Romanian legislation and other reserves arising from profit not distributed in the form of dividends.

	31 December 2025	31 December 2024
Legal reserve	100,828,774	81,835,648
General reserve for credit risk	418,133	418,133
General risk reserve	241,330	241,330
Other reserves from profit	236,818,486	236,818,486
Total	338,306,723	319,313,597

The legal reserve is established in accordance with Romanian legislation, by allocating 5% of gross profit until the reserve reaches 20% of share capital. This reserve is allocated from gross profit and is deductible for profit tax.

In the year 2025 the Bank allocated to the legal reserve the amount of 18,993,126 RON representing 5% of the gross profit recorded in the year 2025, and the remainder of the profit for the year 2025 amounting to 305,054,944 RON represents undistributed profit.

Other reserves from profit are composed of the profit of previous years that was not distributed in the form of dividends.

In the year 2025 no dividends were distributed, and in 2024 dividends were distributed in a total amount of 100,000,000 RON representing undistributed profit relating to the financial year 2023.

The general risk reserve is established in accordance with Romanian legislation and is equal to a minimum of 1% of risk-bearing assets. This reserve cannot be distributed to shareholders. Any release of this reserve is transferred to the profit and loss account. The reserve for credit risk was historically established in accordance with Romanian legislation, and if it is used for purposes other than credit risk a tax of 16% will be paid.

Other reserves from profit are composed of the profit of previous years that was not distributed in the form of dividends.

27. COMMITMENTS AND LETTERS OF GUARANTEE

Letters of guarantee

The total values of the letters of guarantee as at 31 December 2025 and 31 December 2024 are:

	31 December 2025	31 December 2024
Letters of guarantee in RON		
secured by mortgage	139,312,689	139,038,990
secured by cash	114,165,866	166,807,135
secured by other instruments	5,831,153	89,264
Total	259,309,708	305,935,389
Letters of guarantee in foreign currency (equivalent in RON)		
secured by cash	22,997,498	21,385,918
secured by mortgage	10,404,704	7,059,269
secured by other instruments	-	-
Total	33,402,201	28,445,187
Letters of guarantee in RON	292,711,909	334,380,576

27. COMMITMENTS AND LETTERS OF GUARANTEE (CONTINUED)**Letters of guarantee (continued)**

In RON	31 December 2025	31 December 2024
Undrawn loan commitments - irrevocable	511,467,285	382,503,610
Undrawn loan commitments - revocable	2,496,429,980	2,120,128,834
Letters of guarantee	292,711,909	334,380,576
Total undrawn loan commitments and letters of guarantee	3,300,609,174	2,837,013,021

Undrawn loan commitments and letters of guarantee:

At 31 December 2025, the Bank had a financing commitment from Broadhurst Investments Limited in the amount of 260,5 million RON (60,000,000 USD) with maturity on 11 November 2028.

At 31 December 2024, the Bank had a financing commitment from Broadhurst Investments Limited in the amount of 286,6 million RON (60,000,000 USD) with maturity on 15 October 2025.

This financing commitment is unconditional, irrevocable and can be used at any time to protect the Bank's Liquidity Management related to emergency situations .

Both for letters of guarantee and for letters of credit issued in RON, the following arrangement was established: the Bank granted its customers credit line facilities, mainly secured by mortgage and cash collateral, and subsequently issued such letters of guarantee and letters of credit within the limits initially approved for the credit lines.

28. FAIR VALUE OF FINANCIAL INSTRUMENTS

The fair value of financial instruments is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between participants in the market at the transaction date where available.

Fair value is based on quoted market prices. However, there are no market prices available for a portion of the Bank's financial instruments. In situations where quoted market prices are not readily available, fair value is estimated using models with discounted cash flows or other pricing techniques, as appropriate. Changes in the underlying assumptions, including discount rates and estimated future cash flows, significantly affect the estimates.

(a) Cash and balances with central banks

The carrying amounts of cash and balances with the central bank are generally considered to approximate their fair value.

(b) Due from banks

Amounts due from banks include balances in Nostro accounts and deposits placed on short-term or term deposits with maturities of up to one month. The carrying amount approximates fair value.

(c) Loans and advances granted to customers

The fair value of loans with variable yield that regularly change their pricing without any significant change in the credit risk is generally approximated by the carrying amount. At 31 December 2025 the loans with fixed interest rates were 129,107,232 RON out of a total of 8,398,579,405 RON, and their fair value was of 200,279,691 RON out of the total loans at fair value of 8,598,859,096 RON.

At 31 December 2024 the fixed interest rate loans amounted to 90,520,163 RON out of a total of 7,196,501,880 RON and their fair value was of 227,542,171 RON out of the total loans at fair value of 7,333,523,888 RON.

28. FAIR VALUE OF FINANCIAL INSTRUMENTS (CONTINUED)

(d) Amounts owed to banks, borrowings and customers' deposits

Amounts owed to banks include short-term deposits with maturities of up to one month. The estimated fair value of amounts owed to banks is approximately equivalent to the reported amounts. The fair value of demand deposits represents the reported carrying amount of amounts payable on demand at the balance sheet date. The fair value of term deposits at variable interest rates is approximately equal to their reported values at the balance sheet date.

At 31 December 2025 fixed interest rate deposits amounted to 7,315,328,410 RON out of a total of 11,671,054,227 RON and their fair value was of 7,101,095,801 RON out of a total of 11,456,821,619 RON.

At 31 December 2024 fixed interest rate deposits amounted to 6,547,719,611 RON out of a total of 10,827,475,936 RON and their fair value was of 6,367,908,863 RON out of a total of 10,647,665,186 RON.

When classifying the fair value of financial instruments, the fair value hierarchy is used to reflect the significance of the inputs used to make those valuations.

The fair value hierarchy comprises the following three levels:

- quoted (unadjusted) prices in active markets for identical assets or liabilities (level 1);
- inputs, other than quoted prices, included within level 1 that are observable for the asset or liability, either directly (that is, as prices), or indirectly (that is, derived from prices) (level 2);
- inputs for the asset or liability that are not based on observable market data (unobservable inputs) (level 3).

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

28. FAIR VALUE OF FINANCIAL INSTRUMENTS (CONTINUED)

The fair value classification of the Bank's financial asset across the three levels is presented as follows:

31 December 2025

<i>In RON</i>	Carrying amount	Level 1	Level 2	Level 3	Total
Petty cash	61,953,218	61,953,218	-	-	61,953,218
Loans and advances to The National Bank of Romania	1,921,623,531	1,921,623,531	-	-	1,921,623,531
Loans and advances granted to banks	915,792,479	915,792,479	-	-	915,792,479
Loans and advances granted to customers	8,398,579,405	-	-	8,469,751,864	8,469,751,864
Investment securities at amortized cost	2,357,090,250	2,195,643,894	-	192,959,345	2,388,603,240
Financial assets at fair value through profit or loss	21,374,485	-	-	21,374,485	21,374,485
Other financial assets	94,965,206	-	-	94,965,206	94,965,206
Total assets	13.771.378.573	5,095,013,123	-	8.779.050.900	13.874.064.023
Deposits from customers	11,671,054,227	-	-	11,456,821,619	11,456,821,619
Deposits from other banks	1,936,730	1,936,730	-	-	1,936,730
Loans from financial institutions	8,259,261	8,259,261	-	-	8,259,261
Bonds issued	249,138,016	-	-	249,138,016	249,138,016
Subordinated loan	76,217,279	-	-	76,217,279	76,217,279
Other financial liabilities	43,369,212	-	-	43,369,212	43,369,212
Total liabilities	12.049.974.726	10,195,991	-	11.825.546.126	11.835.742.117

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NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS
28. Fair value of financial instruments (continued)

Loans and deposits with fixed rates have been updated to market prices and their fair values have been calculated.

31 December 2024

<i>In RON</i>	Carrying amount	Level 1	Level 2	Level 3	Total
Petty cash	89,282,554	89,282,554	-	-	89,282,554
Loans and advances to the National Bank of Romania	2,282,980,518	2,282,980,518	-	-	2,282,980,518
Loans and advances to banks	959,943,957	959,943,957	-	-	959,943,957
Loans and advances to customers	7,196,501,880	-	-	7,333,523,888	7,333,523,888
Investment securities at amortized cost	1,967,390,959	1,819,421,304	-	164,425,413	1,983,846,717
Financial assets at fair value through profit or loss	20,453,207	-	-	20,453,207	20,453,208
Other financial assets	89,676,258	-	-	89,676,258	89,676,258
Total assets	12,606,229,333	5,062,345,779	89,282,554	7,608,078,766	12,759,707,099
Deposits from customers	10,827,475,936	-	-	10,647,665,186	10,647,665,186
Deposits from other banks	853,213	853,213	-	-	853,213
Deposits from financial institutions	6,260,852	6,260,852	-	-	6,260,852
Bonds issued	242,558,835	-	-	242,558,835	242,558,835
Subordinated loan	74,259,371	-	-	74,259,371	74,259,371
Other financial liabilities	50,781,683	-	-	50,781,683	50,781,683
Total liabilities	11,202,189,890	7,114,065	-	11,015,265,077	11,022,379,142

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

29. TRANSACTIONS WITH RELATED PARTIES

Entities are considered to be related parties if one of them has the ability to control the other directly or indirectly or to exercise significant influence over the other entities in making financial or operational decisions. The Bank engages in transactions with its affiliated companies, shareholders and key management personnel.

All these transactions have been carried out under similar conditions, including those regarding interest rates and collateral conditions, to the terms for transactions similar with third parties. Transactions with other related parties include transactions with the most important shareholders, members of the families of key management personnel and the companies where they are shareholders and have a relationship with the Bank.

At 31 December 2025 and 31 December 2024 the Bank was owned by Broadhurst Investment Ltd (part of the NCH Balkan Fund LP group) which held 66.68% of the total shares, by Romarta SA with a shareholding of 27.56%, by Andrei Siminel Cristian with a shareholding of 5.73% and by other entities with a shareholding of 0.03%.

- LIBRA DEVELOPMENT I.F.N. SA – Associate where the Bank holds 49%
- TRADEVILLE SA - Entity held by a shareholder
- BIL TERENURI SA - Entity held by a shareholder
- ANDREI SIMINEL CRISTIAN - Shareholder
- ANNALIESSE INVESTMENTS LIMITED - Entity held by a shareholder

The Bank has transactions with entities that are members of the NCH Balkan Fund LP group, the ultimate shareholder, as well as with key members of management which are summarized below.

31 December 2025	Parent company	Associate	Key personnel	Other group interest	Total
Loans and advances to customers	-	43,160,610	2,830,293	10,184,955	56,175,558
TOTAL ASSETS	-	43,160,610	2,830,293	10,184,655	56,175,558
Deposits from customers	-	5,101,052	8,609,369	451,838,200	465,548,620
Bonds issued	10,197,000	-	2,248,643	-	12,445,643
TOTAL LIABILITIES	10,197,000	5,101,052	10,858,012	451,838,200	477,994,263
Interest income calculated using the effective interest method	-	4,302,333	198,460	2,177,836	6,678,629
Interest expenses	-	-5,112	-204,127	-10,378,401	-10,587,640
Other operating income	-	-	-	-	-
Fee and commission income	-	33,425	2,542	23,526,481	23,561,448
Fee and commission expenses	-	-	-	-	-
Staff expenses	-	-	- 11,802,069	-	-11,802,069
Other operating expenses	-	-	-3,143,935	-	-3,143,935
Loan commitments	-	14,853,089	433,844	1,527,740	16,814,673
Commitments received	260,502,000	-	-	-	260,502,000

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

29. Transactions with related parties (continued)

31 December 2024	Parent Company	Associate	Key personnel	Other group entities	Total
Loans and advances granted to customers	-	60,465,973	3,295,519	5,907,089	69,668,581
TOTAL ASSETS	-	60,465,973	3,295,519	5,907,089	69,668,581
Deposits from customers	-	4,452,228	43,098,824	302,848,190	350,399,241
Subordinated bonds	9,948,200	-	14,598,984	-	24,547,184
TOTAL LIABILITIES	9,948,200	4,452,228	57,697,807	302,848,190	374,946,425
Interest income calculated using the effective interest method	-	5,632,605	195,960	591,320	6,419,884
Interest expense	-130,360	-2,096	-614,586	-11,557,193	-12,304,235
Other operating income	-	-	-	-	-
Fee and commission income	-	33,282	25,106	20,905,282	20,963,671
Personnel expenses	-	-	- 10,592,958	-	- 10,592,958
Other operating expenses	-	-	-3,295,868	-	-3,295,868
Loan commitments	-	393,353	481,708	1,880,085	2,755,146
Commitments received	286,608,000	-	-	-	286,608,000

The amount presented as remuneration of management represents the total costs of the Bank with salaries (fixed and variable), social contributions, medical insurance, rental expenses, trainings and flight tickets for the members of management.

The Bank does not provide other benefits to management. The remuneration of management is represented predominantly by salary expenses.

Remuneration of key management personnel is as follows:

<i>In RON</i>	31 December 2025	31 December 2024
Expense/income with short-term benefits (employee-related expenses)	11,802,069	10,592,958
Expense (income) with Long-term benefits deferred (other operating expenses)	3,143,935	3,295,868
TOTAL	14,946,004	13,888,826

30. SEGMENT REPORTING

The products and services offered by the Bank are addressed both to individuals and to legal entities, focusing on five main business segments with regard to attracting and placing resources:

- Individuals;
- Small companies including clients in the fields: liberal professions, agriculture and companies with a turnover of less than 4 million EUR;
- Treasury including the activity of managing the Bank's resources and placements, the trading activity, foreign exchange operations and plexcess liquidity;
- Large companies including companies with a turnover of over 4 million EUR;
- Others and General Management, where the Bank allocates all other activities not allocated to the lines of business described above.

Net interest income is calculated as interest income minus interest expense and the result does not contain any internal adjustment related to the surplus or deficit of resources by segments.

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

30. SEGMENT REPORTING (CONTINUED)

The Bank enters into loan agreements with customers resident in Romania, all income being obtained from domestic customers. All of the Bank's assets are located in Romania.

With regard to the concentration of income earned by Libra Internet Bank at counterparty level we can mention that we do not have a significant concentration that would represent over 10% of the Bank's income.

The separate statements of profit or loss and other comprehensive income by segments and the statement of financial position by segments are presented below:

Separate statement of the financial position by segments 2025

	Individuals	Companies small	Large companies	Treasury	Others and GM	TOTAL
Assets						
Cash at hand	-	-	-	-	61,953,218	61,953,218
Financial assets at fair value through profit or loss	-	-	-	-	21,374,485	21,374,485
Loans and advances to the National Bank of Romania	-	-	-	1,921,623,531		1,921,623,531
Loans and advances to banks	-	-	-	915,792,479	-	915,792,479
Loans and advances to customers	718,587,407	2,638,075,927	5,041,916,070	-	-	8,398,579,405
Investment securities at amortized cost	-	-	-	2,357,090,250	-	2,357,090,250
Investments in associates	-	-	-	9,800,000	-	9,800,000
Assets held for sale	-	-	-		232,302	232,302
Tangible assets	-	-	-	-	44,105,909	44,105,909
Intangible assets	-	-	-	-	1,460,587	1,460,587
Deferred tax assets	-	-	-	-	8,880,734	8,880,734
Other assets	-	-	-	-	161,489,956	161,489,956
Total assets	718,587,407	2,638,075,927	5,041,916,070	5,194,506,260	309,297,191	13,902,382,856
Liabilities and equity						
Deposits from customers	4,106,007,247	3,538,324,364	3,953,454,886	-	73,267,730	11,671,054,227
Deposits from banks	-	-	-	1,936,730	-	1,936,730
Loans from financial institutions	-	-	-	8,259,261	-	8,259,261
Bonds senior	-	-	-	205,302,535	-	205,302,535
Bonds issued	-	-	-	43,835,481	-	43,835,481
Loans subordinated	-	-	-	76,217,279	-	76,217,279
Provisions	-	-	-	-	50,941,339	50,941,339
Current tax liabilities	-	-	-	-	5,077,510	5,077,510
Other liabilities	-	-	-	-	85,582,754	85,582,754
Total liabilities	4,106,007,247	3,538,324,364	3,953,454,886	335,551,287	214,869,334	12,148,207,118
Liabilities and equity						
Share capital	-	-	-	-	556,171,200	556,171,200
Reserves	-	-	-	-	338,306,723	338,306,723
Retained earnings	-	-	-	-	859,697,816	859,697,816
Total capital	-	-	-	-	1,754,175,739	1,754,175,739
Total liabilities and equity	4,106,007,247	3,538,324,364	3,953,454,886	335,551,287	1,969,045,073	13,902,382,857

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

30. SEGMENT REPORTING (CONTINUED)

Separate statement of financial position by segments 2024

	Individuals	Companies small	Large companies	Treasury	Others and GM	TOTAL
Assets						
Cash at hand	-	-	-	-	89,282,554	89,282,554
Financial assets at fair value through profit or loss	-	-	-	-	20,453,208	20,453,208
Loans and advances to the National Bank of Romania	-	-	-	2,282,980,518		2,282,980,518
Loans and advances to banks	-	-	-	959,943,957	-	959,943,957
Loans and advances to customers	771,602,521	2,420,747,536	4,004,151,823	-	-	7,196,501,880
Investment securities at amortized cost	-	-	-	1,967,390,959	-	1,967,390,959
Investment in associates	-	-	-	9,800,000	-	9,800,000
Assets held for sale	-	-	-		613,302	613,302
Property, plant and equipment	-	-	-	-	51,341,936	51,341,936
Intangible assets	-	-	-	-	2,611,783	2,611,783
Deferred tax assets	-	-	-	-	7,995,231	7,995,231
Other assets	-	-	-	-	5,055,830	5,055,830
Total assets	-	-	-	-	120,682,460	120,682,460
Liabilities and equity	771,602,521	2,420,747,536	4,004,151,823	5,220,115,434	298,036,304	12,714,653,618
Deposits from customers						
Deposits from banks	3,622,791,169	3,298,038,294	3,816,708,969	-	89,937,504	10,827,475,936
Loans from financial institutions	-	-	-	853,213	-	853,213
Issued bonds	-	-	-	6,260,852	-	6,260,852
Subordinated loans	-	-	-	242,558,835	-	242,558,835
Provisions	-	-	-	74,259,371	-	74,259,371
Current tax liabilities	-	-	-	-	45,662,759	45,662,759
Other liabilities	-	-	-	-	87,455,036	87,455,036
Total liabilities	3,622,791,169	3,298,038,294	3,816,708,969	323,932,271	223,055,299	11,284,526,002
Liabilities and equity						
Share capital	-	-	-	-	556,171,200	556,171,200
Reserves	-	-	-	-	319,313,597	319,313,597
Retained earnings	-	-	-	-	554,642,819	554,642,819
Total equity	-	-	-	-	1,430,127,616	1,430,127,616
Total liabilities and equity	3,622,791,169	3,298,038,294	3,816,708,969	323,932,271	1,653,182,915	12,714,653,618

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

30. SEGMENT REPORTING (CONTINUED)

Separate statement of profit or loss and other comprehensive income by segments 2025

	Individuals	Small companies	Large companies	Treasury	Others and GM	TOTAL
Interest income calculated using the effective interest method	65,333,881	266,014,180	428,069,529	210,445,878	-	969,863,468
Interest expenses	-114,635,518	-74,308,697	-88,557,885	-23,609,858	-2,511,138	-303,623,096
Net interest income	-49,301,637	191,705,482	339,511,644	186,836,020	-2,511,138	666,240,375
Fee and commission income	4,186,672	39,622,544	57,950,702	326,606	49,226,333	151,312,857
Fee and commission expenses	-	-	-	-7,148,971	-57,362,410	-64,511,381
Net fee and commission income	4,186,672	39,622,544	57,950,702	-6,822,365	-8,136,076	86,801,476
Net income from financial instruments at FVTPL	-	-	907,786	-	1,407,432	2,315,217
Share of loss from associates	-	-	-	-	-	-
Net gains from foreign exchange transactions and revaluation	-	-	-	72,365,270	-	72,365,270
Other operating income	6,866	42,607	68,538		8,996,413	9,114,424
Total operating income	-45,108,100	231,370,633	398,438,670	252,378,926	-243,370	836,836,759
Personnel expenses	-	-	-	-	-288,061,566	-288,061,566
Depreciation and amortisation expense	-	-	-	-	-20,187,148	-20,187,148
Other operating expenses	57,214	760,628	951,891	-	-147,675,111	-145,905,378
Total operating expenses	57,214	760,628	951,891	-	-455,923,825	-454,154,092
Profit before impairment losses and tax	-45,050,886	232,131,261	399,390,562	252,378,926	-456,167,195	382,682,670
Net income/(expenses) from impairment of financial instruments	3,681,414	34,560,496	77,839,032	-	-118,901,086	-2,820,144
Profit before tax	-41,369,472	266,691,757	477,229,594	252,378,926	-575,068,281	379,862,527
Income tax expense	-	-	-	-	-55,814,406	-55,814,406
Net profit for the financial year	-41,369,472	266,691,757	477,229,594	252,378,926	-630.882.687	324,048,123
Other items of comprehensive income						
Total comprehensive income for the financial year	-41,369,472	266,691,757	477,229,594	252,378,926	-630.882.687	324,048,123

NOTES TO THE STANDALONE AND SEPARATE FINANCIAL STATEMENTS

30. SEGMENT REPORTING (CONTINUED)

Separate statement of profit or loss and other comprehensive income by segments 2024

	Individuals	Companies Small	Large companies	Treasury	Others and GM	TOTAL
Interest income calculated using the effective interest method	57,648,541	245,381,907	400,099,012	211,666,082	-	914,795,542
Interest expense	-112,964,072	-73,110,000	-83,955,953	-23,494,991	-3,008,602	-296,533,618
Net income from interest	-55,315,531	172,271,907	316,143,059	188,171,091	-3,008,602	618,261,924
Fee and commission income	4,887,441	50,722,922	48,667,402	589,789	44,812,289	149,679,843
Fee and commission expense	-	-	-	-17,999,502	-48,021,726	-66,021,228
Net fee and commission income	4,887,441	50,722,922	48,667,402	-17,409,713	-3,209,437	83,658,615
Net income from financial instruments at FVTPL	-	-	953,090	-	2,325,875	3,278,965
Share of loss from associates	-	-	-	-	-	-
Net gains from foreign exchange transactions and revaluation	-	-	-	54,065,995	-	54,065,995
Other operating income	23,224	80,708	136,964	-	6,798,226	7,039,121
Total operating income	-50,404,866	223,075,537	365,900,515	224,827,373	2,906,061	766,304,620
Personnel expenses	-	-	-	-	-233,341,771	-233,341,771
Depreciation and amortization expenses	-	-	-	-	-19,059,171	-19,059,171
Other operating expenses	-	-	-	-	-117,919,660	-117,919,660
Total operating expenses	-	-	-	-	-370,320,601	-370,320,601
Profit before impairment losses and taxes	-50,404,866	223,075,537	365,900,515	224,827,374	-367,414,540	395,984,019
Net income/(expenses) from impairment of financial instruments	7,815,895	16,307,500	53,971,777	-	-155,868,751	-77,773,579
Profit before taxation	-42,588,971	239,383,037	419,872,292	224,827,374	-523,283,291	318,210,440
Income tax expense	-	-	-	-	-47,988,593	-47,988,593
Net profit for the financial year	-42,588,971	239,383,037	419,872,292	224,827,374	-571,271,884	270,221,847
Other items of comprehensive income						
Total comprehensive income for the financial year	-42,588,971	239,383,037	419,872,292	224,827,374	-571,271,884	270,221,847

31. EVOLUTION OF THE ECONOMY

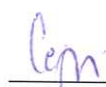
Year 2026 is expected to be of crucial importance for Romania's economic trajectory, as it represents the final milestone for the implementation of projects under the PNRR and, at the same time, an important point in the fiscal correction process. The macroeconomic context will be characterized by an evident duality: on the one hand, the prospect of a solid inflow of European funds, and on the other hand, the implementation of deep domestic reforms to support competitiveness. The Romanian economy could have the chance of a slight acceleration of real gross domestic product growth up to 1.2% in 2026 compared with 0.6% in 2025, but this development is conditional on a significant improvement in the absorption rate of European funds (15-16 billion EUR) to fuel investments. Major projects in the area of transport infrastructure, health & education, energy & digitalization, environment, SMEs & social represent the supporting pillars of gross domestic product. Weaker absorption, below 70% of the target, could be equivalent to keeping the economy barely afloat. Annual inflation could end the year 2026 in the 4-5% range. The decline in inflation in the second part of this year, mainly due to the base effect (liberalization of electricity prices, VAT, excise duties), will allow the central bank to cut the monetary policy rate at least twice. Subject to the maintenance of political stability, progress in implementing reforms in the public sector and increased absorption of European funds, the 3-month ROBOR will remain below the key rate in the 5.5-6.0% range. The RON-EUR exchange rate, estimated to fluctuate in the 5.10-5.15 range, could be an anchor of stability in 2026, in the context of continued political stability but also of the structural pressure generated by the twin deficits (budgetary and current account). We expect further corrections with regard to the twin deficits, with the budget deficit potentially falling below 7% of gross domestic product in 2026, and the current account deficit expected to decline towards 7.5% of gross domestic product.

32. SUBSEQUENT EVENTS

On 6 April 2026, the Competition Council sent Libra Internet Bank S.A. the investigation report regarding the ROBOR fixing procedure, this constituting a stage prior to the authority's final decision. The Bank considers that its activity has fully complied with the applicable legal framework and will go through all available procedural steps to demonstrate this, the outcome of the process remaining uncertain at the date of the financial statements.

The financial statements were approved by the Board of Directors on 21 April 2026:



Lucian Claudiu Anghel,
Deputy General Manager

Melinda Cepi,
Head of Finance Division

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