



VISTA BANK

Report regarding the disclosure and transparency requirements 2025

Vista Bank (Romania) S.A.

VISTA BANK (ROMANIA) S.A.

**Report regarding disclosure and transparency requirements
related to the Year 2025**

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1. GENERAL ASPECTS

The present Report has been drawn up with the purpose to meet the requirements to ensure an adequate level of transparency, by publishing the significant information on Vista Bank (Romania) SA (hereinafter referred to as the Bank)' risk profile and strategy, as per the provisions of NBR Regulation no. 5/2013 regarding the prudential requirements for credit institutions with the further modifications and of the EU Regulation 575/2013 on prudential requirements for credit institutions and investment firms with the further modifications.

The information included in this document is related to the year 2025 and have as reference date the date of 31.12.2025.

The following disclosure requirements provided by the EU Regulation 575/2013 are not applicable at the bank level:

- art 73 - Distributions on own funds instruments, paragraph (6) disclosure of the broad market indices on which their capital instruments rely
- art 441 - Indicators of global systemic importance
- art 444 - Use of ECAIs
- art 447 - Exposures in equities not included in the trading book
- art 449 - Exposure to securitisation positions
- art 452 - Use of the IRB Approach to credit risk
- art 454 - Use of the Advanced Measurement Approaches to operational risk
- art 455 - Use of Internal Market Risk Models

2. INFORMATION UNDER THE BANK'S PROPERTY AND CONFIDENTIAL INFORMATION

As per the EU Regulation 575/2013 on prudential requirements for credit institutions and investment firms with the further modifications, related to the definition of the information under bank's property, as well as of the confidential information, the following information are:

Bank's property (their disclosure may produce material and/or competition related damages in case of their publishing):

- The general business strategy;
- The way to determine and monitor the bank's risk profile;
- The internal regulation system (strategies, policies, plans, norms, manuals, procedures);
- The detailed description of the limits system used at the risk management;
- Any other strategic information.

Confidential (their disclosure may produce material and image damages for the Bank, for clients, providers and business partners):

- Information included in the contracts concluded with the clients and other business partners or providers of the Bank;
- Any kind of information on the architecture and functions of the IT systems used by the Bank;
- Any information on the clients, business partners or providers without their express consent.

Considering the above, all the information included in this report is significant within the meaning of art. 432, point 2 of the Regulation 575/2013.



3. INFORMATION REGARDING THE ADMINISTRATOR FRAMEWORK OF THE ACTIVITY IN VISTA BANK (ROMANIA) SA

The Administrators framework of the Bank (bank governance) is regulated through the Constitutive Deeds, internal procedures and manuals and the Internal Functioning and Organization Regulation and it refers to responsibilities of the management from the perspective of establishing the business objectives and the risk Administrators strategy and the risk profile, ways of organizing the activities, assigning responsibilities and competencies, establishing the reporting lines and the related information, as well as the organization of the internal control system.

The Internal Functioning and Organization Regulation defines, in compliance with the legal requirements and the corporate governance principles, the following:

- The organization structure of the Bank;
- The duties and responsibilities of the Executive Managers of the Bank;
- The responsibilities of the Board of Administrators, Management Committee, Audit and Risk Management Committee, Assets and Liabilities Management Committee and other Committees of the Bank;
- The objectives and responsibilities of each department of the Bank's Head Office, the duties and responsibilities of the departments' managers;
- The responsibilities of the territorial units the duties and responsibilities of the Retail Network Department;
- Principles of internal control (the culture of internal control, risk assessment, control activities and segregation of duties, information and communication, monitoring and remediation of the deficiencies) as well as the organization of the internal control functions.

The Administrators framework of the Bank is adapted to the nature, extension and complexity of the performed activity.

MANAGEMENT BODY

Management Body in its Supervisory Function (Board of Administrators/BoA)

The Board of Administrators decides on the operations of the bank for which a decision and collective deliberation is required, the implementation of the decisions of the general meeting of shareholders and on any other activities of the bank that are within its competence.

The BoA has the authority to decide about the following issues, but not being limited to these:

- Approves the opening and closing of secondary units (branches, working points, agencies, etc.);
- Approves all internal norms and regulations of the Bank which are required by legal provisions to be approved by the Board. All other regulations and internal procedures of the Bank will be approved by the Bank's Management Committee;



- Decides upon the number, appointment and revocation of the Bank's Executive Directors, the tenor of their mandate and their remuneration.
- Analyses and approves the Organizational Chart of the Bank and makes sure that such Chart is:
 - adequate and transparent;
 - the workflows between the Bank's Departments and Units, as a whole, interact in order to assure an efficient structure;
- Approves the Organization and Functioning Regulation of the Bank;
- Establishes the business objectives of the Bank;
- Ensures the integrity of accounting and financial reporting systems, including the financial and operational controls and the compliance with relevant legislation and standards;
- Revises yearly and approves the Strategy for the Management of the Risks and the related policies;
- Monitors the strategy for the management of significant risks and the risk appetite of the bank;
- Approves the remediation plan presented by the Audit and Risk Management Committee, in case that the prices do not reflect accordingly the risks as per the business model and the strategy for the management of significant risks;
- Supervises the activity of the Bank's Executive Managers;
- Approves and reconsiders the risk profile for each significant risk, establishing objectives and strategies;
- At least once a year analyses and, if necessary, amend the Organizational Chart, the present Regulation and the duties and responsibilities of the Management Committee;
- Ensures that remuneration policies and practices of personnel, including members of the supervisory function and the members of the leadership position, corresponding credit institution culture, objectives and long-term strategy, and its control environment
- Approves the remuneration policy;
- Supervises the process for the publication and communication of information of the Bank;
- Analyses the Reports received from the Internal Audit, Risk Management and Compliance departments and takes necessary measures;
- May request the Bank's Management to submit reports on their activity;
- Monitors the performance of the Bank's Management;
- Analyses and decides upon the establishment of Committees;
- To approve the policies for the management of the significant risks, to periodically analyse them, at least once per year, and to revise them, if the case;
- Annually analyses the report of the Compliance Department;
- To ensure that the Executive Managers implement the appropriate measures to identify, evaluate, monitor and control the risks including the outsourced activities;



- To approve the procedures for attributions and responsibilities related to risk management;
- To approve new outsourced activity and its independent service provider and existing outsourced activity assigned to a new service provider;
- To approve the staff training policy;
- Reviews the reports on the results of the internal capital and liquidity risk adequacy process (ICAAP-ILAAP) and the results of the crisis simulations and takes into account the recommendations and opinions made by the Audit and Risk Management Committee;
- Approves the Reports on the results of the internal capital and liquidity risk adequacy process (ICAAP-ILAAP) and the results of the crisis simulations, a document that will be sent to the regulatory authority;
- Ensures the implementation of Bank's capital plan;
- Integrates the Internal Capital Adequacy Assessment Process philosophy into the culture and management process of the Bank;
- Shall approve the overall stress testing framework;
- Approves the Yearly Report about the conditions on which internal control is performed, with a distinct presentation of the aspects related to the risk control function, compliance function and internal audit function;
- Takes consequent measures after analyzing the performed stress tests results;
- Approves the report related to the activities which are not performed on an usual manner or are not transparent;
- Analyses and approves at least annually the Report on the disclosure and transparency requirements of the Bank (at the same time ratifies the frequency of information disclosure, as per the decision of the Management Committee);
- Approves the statement regarding the adequacy of the capital;
- Approves the statement regarding liquidity adequacy;
- Approves the risk appetite statement, which expresses the risk appetite. This includes qualitative and quantitative indicators expressed at least relative to profits, own funds, risk and liquidity indicators, as well as aspects regarding risks that are more difficult to quantify (such as: reputational risk and conduct risk) and regarding the field of money laundering, financing terrorism and unethical practices;
- Approves the declaration on the adequacy of risk management arrangements of the bank, providing assurance that the risk management systems put in place are adequate with regard to the bank's profile and strategy;
- Approves an explicit capital plan, which states at least the following:
 - The bank's objectives and the time horizon for achieving those objectives;
 - A general description of the capital planning process and the responsibilities for that process;
 - How the bank shall comply with capital requirements in the future;
 - Any relevant limits related to capital;
 - A general contingency plan for dealing with divergences and unexpected events, such as raising additional capital, restricting business or using risk mitigation techniques.
- Approves all Bank policies, internal Corporate Governance regulations, specific regulations (norms, internal audit, risk, human resources, Financial, accounting);



- The BoA is responsible for the implementation and maintaining of an adequate and efficient Internal Control system.
- Therefore, it has to:
 - Periodically, at least annually, must revise and approve the overall strategy and policies related to the bank activity;
 - The members of the management body in their supervisory role must monitor and discuss the bank's business strategy in a constructive manner;
 - Establish acceptable significant risks levels and take all measures needed (Bank Management) in order to identify, evaluate and monitor the relevant risks;
 - Supervise the way Internal Control efficiency is monitored by the Bank Management. Quarterly the Internal Control System Manager will submit activity reports and yearly will participate to BoA Meetings.
- The following measures has to be taken by Bank Management in order to achieve all assigned tasks:
 - Periodical discussions (quarterly preferred) with Bank Management regarding the Internal Control efficiency;
 - Periodical analysis (quarterly preferred) of the evaluations performed by Bank Management, Internal Audit, External Auditor if the case and National Bank of Romania, in respect of Internal Control System;
 - Ensure that the Bank Management implements all recommendations made by Internal & External Audit and National Bank of Romania with reference to the deficiencies that have been found in the Internal Control activity.
- Analysis of the impact following the implementation by the Bank's Management of the recommendations formulated by the internal audit, the financial auditor and the National Bank of Romania regarding the deficiencies of the internal control system and the examination of the effect of the implemented measures.
- Regarding the recovery plan:
 - Ensure the implementation of a sound recovery plan;
 - Review, provide input and approve the recovery plan;
 - Ensure sufficient resources are dedicated to the development and review of the recovery plan as well as for monitoring the recovery plan indicators.

Establishing, approving and supervising the implementation of the bank's general business strategy and key policies, taking into account the applicable legal and regulatory framework, financial interests and long-term solvency;
- Establishing, approving and supervising the implementation of the general risk management strategy, including risk appetite and the risk management framework, as well as the necessary measures to ensure that the management body devotes sufficient time to risk-related issues;
- Establishing, approving and supervising the implementation of an adequate and effective activity management framework that includes a clear organizational structure, as well as an internal control framework that is based on the organization of independent control functions, namely the risk management function, the compliance function and the internal audit function;
- Establishing, approving and monitoring the amounts, types and distribution of both the internal capital and the regulated capital to adequately cover the risks;



- Establishing, approving and supervising the implementation of objectives aimed at managing liquidity;
- establishing, approving and supervising the implementation of a remuneration policy that respects the principles of remuneration;
- establishing, approving and overseeing the implementation of a framework to ensure that the assessment of the suitability of the governing body, both at the individual and collective level, is carried out effectively, that the succession planning of the members and the composition of the governing body are appropriate and that the governing body management fulfills its duties effectively;
- establishing, approving and supervising the implementation of a process of selection and evaluation of the suitability of persons holding key positions;
- establishing, approving and supervising the implementation of a framework that ensures the internal functioning of each committee of the governing body, when it is established, and which includes in detail:
 - (i) the attributions, responsibilities and composition of each committee;
 - (ii) an adequate flow of information, including documentation related to the recommendations and conclusions formulated by each committee, reporting lines between each committee, the bank's management body and other parties;
- establishing, approving and supervising the implementation of a risk culture;
- establishing, approving and supervising the implementation of a corporate culture and values;
- establishing, approving and supervising the implementation of a policy regarding the conflict of interests at the institutional level;
- establishing, approving and overseeing the implementation of an outsourcing policy, ensuring that any changes to it are implemented promptly.

Senior management/Management Committee

The Management Committee is responsible for taking all measures related to the management of Vista Bank (Romania) S.A. within the limits of the Bank's object of activity and in compliance with the exclusive competences provided by law, the Articles of Association, the General Meeting of Shareholders and the Board of Directors.

The Management Committee is the main forum with executive management responsibilities subordinated to the Board of Administrators.

The members of the Bank's Management Committee --the Chief Executive Officer, the First Deputy Chief Executive Officer, and the two Deputy Chief Executive Officer ensure the management and coordination of daily activities of the Bank, having attributions and responsibilities as defined by Bank's Constitutive Deeds, decisions of the Board of Directors and the legislation in force.

The Management Committee has the authority to decide about the following issues, but not being limited to these:

- Approval of the internal regulation of the Bank within its approval competence.
Also, the Management Committee pre-approves all the internal regulations within Board of Administrators competence.
- The Committees's members are responsible to the Board of Administrators and the General Assembly of Shareholders for the operations carried out within the Management Committee.
- In addition to the daily duties, the Management Committee may also have other duties and responsibilities established by decisions of the Board of Administrators that are subject to prior authorization by the National Bank of Romania in accordance with the applicable legislation in force.



- Nomination of the Department's managers, Managers and Deputy Managers of the branches.
- Approves the signature rights of the Bank's employees.
- At least one a year or whatever is necessary they have the duty to revise and submit for approval of the Board of Administrators the proposals to modify the Organizational Chart of the Bank, the present Regulation, as well as the other internal regulations of the Bank within its approval competence.
- Analyzes the reports issued by the Internal Audit, Risk Management and Compliance and Anti-Money Laundering and Anti-Fraud departments, adopting the measures deemed necessary.
- Prepares and submits to the Board of Administrators the annual report regarding the compliance risk management.
- Approves the modeling of sensitivity analysis or crisis scenarios.
- Agrees, approves and sends to the Board of Administrators the annual report regarding the way Internal Control is carried out, with a detailed presentation of aspects regarding risk management, compliance and internal audit.
- Agrees, approves and sends to the Board of Administrators the report regarding the internal capital adequacy process (ICAAP - ILAAP) and the results of stress tests.
- Agrees, approves and sends to the Board of Administrators the annual report regarding the measures taken for management of the significant risks to which the Bank is exposed.
- Adopts the necessary measures following the analysis of the results of the crisis scenarios carried out.
- Agrees, approves and sends to the Board of Administrators the report regarding the activities that are not regularly carried out or are not transparent.
- Agrees, approves and sends to the Board of Administrators the statement on the adequacy of the Bank's risk management framework, ensuring that the existing risk management systems are adequate taking into account the Bank's profile and strategy.
- Agrees, approves and sends to the Board of Administrators the statement regarding the risks in which are shortly described the general risk profile of the Bank associated with Bank's Business Strategy. This statement must include key indicators and data, which provide to the external stakeholders with a comprehensive overview of how the Bank manages its risks, including how the Bank's risk profile interacts with the risk tolerance established by the management structure.
- Implement the Strategies approved by the Board of Administrators and ensures that they are communicated to authorized persons.
- Ensures the communication of policies and procedures relating to the identification, assessment, monitoring and control of risks to the staff involved in their implementation.
- Maintains adequate systems for reporting exposures and other risk elements.
- Establishes limits for the Bank's exposure to risks including limits for critical situations, in relation to the size, complexity and financial situation of the Bank.
- Ensures the efficiency and effectiveness of the Internal Control System.
- Analyzes the outsourced functions from a risk perspective for approval by the Board of Administrators;
- Ensures a correlation between the staff remuneration policy and the Bank's risk strategy.
- Ensures the existence of permanent communication to the Board of Administrators regarding recommendations for changes to risk management strategies and policies, when deemed necessary, to reflect any changes in internal and external factors, taking into account in particular changes in the macroeconomic environment in which the Bank operates.



- Ensures that the Internal Control System provides for an adequate separation of duties, aiming to prevent conflicts of interest, establishes and proposes for approval to the Board of Administrators policies in this regard.
- Establishes those strategies and policies that ensure the maintenance of an appropriate level of capital and own funds, so that risks are covered.
- Monitors and periodically review the effectiveness of the Bank's governance framework;
- Includes capital planning and capital management in the overall risk management approach;
- Review the procedures for management and measuring the risks within their attribution.
- Analyzes, at least annually, the information contained in the Bank's Disclosure and Transparency Requirements Report and submits it for approval to the Board of Administrators. Approves, based on the information provided by the involved departments, the frequency of publication of this information. Ensures that the Internal Capital Adequacy Assessment Process is an integral part of the Bank's management and decision-making process.
- Approves auctions based on documentation and proposals received from the Administrative and Repossessed Assets Department.
- Evaluates and approves the development and promotion of new products/ services, as well as the modification of the characteristics of existing products/ services.
Approval will be granted based on the analysis of the documentation presented by the respective business line, documentation that must contain the characteristics of the product, market research, the target market to which the product is addressed and the approximate value of the volume to be achieved, as well as taking into account the opinions of the relevant internal control departments within the Bank.
- Approves all new projects to be initiated within the Bank based on the Feasibility Studies presented for the respective projects and the selection of offers;
- Regarding the financial recovery plan, informs the Board of Administrators on the circumstances of the Bank's situation and the options considered for its implementation.
- Decides on the appointment of the Recovery Plan Management Team, its composition and is responsible for the development and updating of the Bank's Recovery Plan.
- At least one member of the Management Committee will be part of the working group for the Financial Recovery Plan;
- Analysis of the causes that generated complaints and monitoring their resolution, as well as adapting corrective measures, where appropriate.
- Approves the terms and conditions for establishing the interest rate, fees and commission policy, in RON and foreign currency, including for the Bank's employees
- Identifying any suggestions or proposals for improving the products/services offered to customers;
- If applicable, issuing recommendations and decisions regarding the improvement of certain workflows and/or responsibilities within the Bank's procedures;
- Establishing, approving and supervising the implementation of a framework to ensure the integrity of the accounting and financial reporting systems, including operational and financial controls, as well as compliance with legal provisions and standards in the field;
- Supervising the process of publishing information and communicating with the National Bank of Romania - Supervision Division and other interested third parties.
- The Management Committee must report comprehensively and inform periodically, according to internal procedures, and whenever necessary, without undue delay, the Management Body in its supervisory function, regarding the elements relevant for the assessment of a situation, risks and



developments that affect or may affect the Bank, such as, for example, important decisions taken regarding the activities and risks, the assessment of the Bank's economic and business environment, liquidity and capital soundness, as well as the assessment of exposures to significant risks.

3.1 The bank committees, their responsibilities and structure

Responsibilities and operational terms of the Committees established as instruments for achieving management's objectives, are detailed within bank's Internal Functioning and Organization Regulation and Organizational Chart.

Committees under Management Body in its Supervisory Function:

a. Audit and Risk Management Committee

• Members:

- Mr. Theodoros Efthys (Member and Chairman of the Committee appointed on 24.09.2019)
- Ms. Pavlina Tavridaki (Member since 02.04.2019)
- Mr. Panagiotis Konstantaras (Member since 29.11.2024)

b. Nomination Committee

• Members

- Mr. Stavros Lekkakos (Member and Chairman of the Committee since 24.09.2019)
- Mr. Ilias Volonasis (Member since 25.05.2020)
- Mr. Panagiotis Konstantaras (Member since 25.05.2020)

a. Audit and Risk Management Committee

Componence:

- The standard composition of the Committee consists of three non-executive independent members of the Board of Administrators.
- Due to the requirements of the applicable legislation in force the Chairman of the Board of Administrators cannot be also the Chairman of the Committee.
- The requirements of independence of a committee's member are identical to the requirements of independence of a Board of Administrators' member laid down in the applicable legislation in force.
- At least one Committee member should have competences in accounting and statutory audit area, as evidenced by specific qualification papers for the respective areas.
- The members of the Committee should all times possess, individually and collectively, the necessary knowledge, skills and expertise to fully understand the duties to be performed by the committee;
- The members of the Audit and Risk Management Committee as a whole shall have recent and relevant practical experience in the field of financial markets or need to have obtained, from their background business activities, sufficient professional experience directly related to financial markets activity. The Chairman of the Audit and Risk Management Committee shall have specific knowledge and experience in applying accounting principles and internal control processes;
- The Chairman of the Committee must be independent.



The committee has the following attributions and responsibilities:

- Annually the Committee shall assess the adequacy of the Bank's internal control system;
- The Committee shall be, on an ongoing basis, the point of reference for all independent internal control functions (Risk Management, Compliance and Money Laundering Prevention, Anti-Fraud and Internal Audit) as well as for the financial control area; it shall receive regular information from these structures on specific activities;
- The Committee reports to the Bank's Board of Directors periodically, when appropriate, or after each ordinary meeting and informs about all activities carried out, suggesting and/or recommending the necessary actions to improve the internal control system;
- Receive and consider audit reports.

Financial Reporting

- Supervise the setup of accounting policies by the Bank
- Monitor and analyses the financial reporting process (e.g., annual financial statements and the quarterly financial reports), submitting recommendations aimed at ensuring its integrity;

Internal Control System

- Monitor the effectiveness of the internal control and risk management systems and, where applicable, the internal audit function, in relation to the Bank's financial reporting, without prejudice to the independence of that function;
- Monitor and verify the effectiveness of the internal control system and compliance with applicable legal requirements, obtaining ongoing updates from the Bank's Management as well as the Director of Compliance;
- Review and approve the charter and work plan of the internal audit function (including the scope and frequency) prior to approval by the Board of Directors;
- Approve the appointment, remuneration and dismissal of directors of the internal control system independent functions;
- According to the provisions of the applicable regulations and professional auditing standards the Director of the Internal Audit Department shall confirm to the Committee and further to the Board of Directors, at least annually, the independent organization of the internal audit activity;
- Directors of internal control functions shall not be removed without prior approval of the Board of Directors;
- Review periodic reports issued by the Bank's internal control functions;
- Monitor the implementation of recommendations made by the Bank's internal control functions;
- To analyses the results of verifications carried out by the Supervisory Authority and/or other control authorities;
- Verify the timely adoption by senior management of corrective actions necessary to address control deficiencies, non-compliance with legal and regulatory frameworks, policies, and other issues identified by auditors;
- To inform and support the Board of Directors on the monitoring of risk appetite and the implementation of the Bank's current and future risk strategy, taking into account all types of risks, to ensure compliance with the Bank's business strategy, objectives, culture and corporate values;
- To assist the Board of Directors in monitoring the implementation of the Bank's risk strategy and related limits;
- Oversee the implementation of the Bank's capital and liquidity management strategies and all other relevant risks, such as market, credit, operational (including legal and ICT risks) and reputational



risks, to assess their appropriateness in relation to the Bank's risk appetite and approved significant risk management strategy;

- Make recommendations to the Board of Directors on necessary adjustments to the significant risk management strategy as a result of, inter alia, changes in the Bank's business model, market developments or recommendations issued by the risk management function;
- Advise on the appointment of external consultants that the Board of Directors may decide to engage for advice or assistance;
- Analyze a range of possible scenarios, including crisis scenarios, to assess how the institution's risk profile would react to external and internal events;
- Assess, based on monthly and/or quarterly risk reports:
 - o Compliance of the Bank's activities with risk policies;
 - o the adequacy and effectiveness of risk management policies, compliance with the level of risk resilience adopted by the Bank and compliance with regulatory requirements;
 - o the appropriateness of various limits;
 - o the appropriateness of expected loan losses in relation to the level of risk assumed by the Bank;
- To verify that the pricing of liability and asset products offered to customers fully takes into account the Bank's business model and risk strategy. If the prices do not adequately reflect the risks in line with the business model and the risk strategy, the Audit and Risk Management Committee must present the Board of Directors with a plan to remedy the situation;
- Review, whether the incentives provided by the remuneration system take into account risk, capital, liquidity, and the probability and timing of returns to support the implementation of sound remuneration policies and practices and assess the recommendations of internal or external auditors and follow up on the appropriate implementation of the measures taken.

Statutory Audit

- To inform the Board of Administrators of the outcome of the statutory audit and explain how the statutory audit contributed to the integrity of financial reporting and what was the effective role of the Audit and Risk Committee in that process;
- To monitor the financial reporting process and submit recommendations or proposal as to ensure its integrity and efficacy;
- To monitor the effectiveness of the internal control and risk management systems and the adequacy of internal audit regarding the financial reporting;
- To monitor the statutory audit of the annual and consolidated financial statements (if applicable), especially its performance, taking into account any findings and conclusions of the Authority for Public Supervision of the Statutory Audit Activity established according to the applicable legal provisions and to participate in meetings at least annually with the statutory auditor;
- To examine the activities carried out by the statutory auditors, including the working plan, and to assess the results presented in: the audit report, the additional report to the Committee, the management letter and in any other significant document, by discussing the relevant issues;
- To review and monitor the independence of the statutory/financial auditors as per legal applicable provisions, and in particular the appropriateness of performing of other services than the financial audit ones/ to the Bank in accordance with the applicable legislation in force;
- To be responsible for the financial auditor's selection procedure and to recommend for further approval by the Board of Administrators their appointment, remuneration and recalling;
- Review the audit scope and frequency of the statutory audit of annual/ consolidated accounts.



b. Nomination Committee

Board of Administrators appoints the Committee, and it is composed of at least three non-executive directors (who do not have and never held in the past an Executive Management position within the bank). The Board of Administration of the Bank appoints one of the independent members of the Committee as President. The president is a non-executive member of the governing body (Board of Administration) in his supervisory capacity and must be able to exercise an objective judgment.

The Director or Deputy Director of the Human Resources Department will act as Secretary of the Committee. The representation in Nomination Committee is not possible.

The attributions and responsibilities of the Committee are as follows:

- Identify and recommend to the approval of the management body or the General Assembly of Shareholders, candidates to occupy the vacant positions within the management body, to assess the balance of knowledge, skills, diversity and experience within the management body and prepare a description of the roles and abilities with a view to appoint an individual on a particular position and assess the expectations as regards the time allocated to that end;
- To assess on a regular basis, but at least once a year, the structure, size, composition and performance of the management body and make recommendations to the management body with respect to any changes;
- To assess on a regular basis, but at least once a year, the knowledge, skills and experience of each member of the management body and of the management body as a whole and report to the management body accordingly;
- To review on a regular basis the policy of the management body as regards the selection and appointment of members of senior management and make recommendations to the management body.
- To decide with respect to a target concerning the representation of the male or female gender, poorly represented in the structure of the management body and draw up a policy concerning the means for increasing the number of these individuals in the structure of the management body in order to achieve the target concerned. The target, policy and its implementation shall be disclosed as per legal requirements.
- To contribute actively also to the fulfilment of the Bank's responsibilities concerning the adoption of internal policy on assessment of the adequacy of the members of the management body and of key function holders as per the legal provisions.
- To take into account, if possible and on an ongoing basis, the need to ensure that the decision-making process of the management body is not dominated by any individual or small group of individuals in a manner prejudicing the interests of the Bank as a whole.
- Will have access to all relevant and needed information and data for fulfilling their duties and responsibilities, including that information and data received from internal control and other relevant functions such as those related to the legal, financial, human resources;
- To ensure an appropriate involvement of internal control and other relevant functions, such as those related to the legal, financial, human resources, in their areas of expertise and / or to request the opinion of external consultants appointed by the management body in its supervisory function for this purpose, if necessary.

The Senior Management Committees are:

a. Assets and Liabilities Committee (ALCO)



The objective of the Asset and Liability Committee is to achieve efficiency in the use of capital by maximizing the return on risk-weighted assets and net profit in the context of a clearly defined growth policy.

The Asset and Liability Committee does the management of:

- interest rate risk,
- solvency requirements,
- foreign exchange risk affecting the Bank's overall activity,
- the Bank's medium- and long-term liquidity risk, and
- the establishment of standard pricing for the Bank's asset and liability products.

The Committee's duties and responsibilities:

- Analyses the balance sheet in terms of achieving the allocation and efficient use of assets and liabilities and ensuring their prudent management;
- Monitors and reviews the following risks of the bank and ensures their prudent management such as credit risk, interest rate risk, liquidity risk, financing risk, portfolio and capital risk;
- Monitor the external environment and measure the impact on profitability of factors such as:
 - Interest rate volatility, its evolution, periodic performance of crisis simulations (application of stress-test scenarios), sensitivity analyses for example, VaR (if applicable);
 - Market liquidity;
 - Exchange rate volatility, its evolution, periodic performance of crisis simulations (application of stress-test scenarios), sensitivity analyses for example, VaR (if applicable);
 - Monetary and fiscal policies and the impact of other changes in the economic environment;
 - Competition on the banking market, market strategies and market shares;
 - Overall economic and banking environment.
- Monitors profitability by business line, product, and unit, considering capital allocation and cost of capital;
- Analyses the current structure and the forecasted structure of the capital structure;
- Analyses the bank's current performance in relation to the budget and to the objectives and policies at the bank level;
- Analyses the structure and cost of attracted funds and their allocation and defines the financing policy of the lending activity;
- Analyses the structure and quality of the bank's loan portfolio;
- Analyses and orders measure regarding the following aspects:
 - Interest rate and commission policy;
 - The structure and maturity of their assets and liabilities;
 - Type and size of the interest rate gap;
 - The size of foreign exchange positions on the total and on each currency;
 - Stress and sensitivity analyses;
 - Liquidity analyses and liquidity rates.
- Proposes to the Board of Directors the definition of the strategy regarding the management of the bank's assets and liabilities in order to optimize the profit;
- Analyses the movements on the clients' accounts and the dynamics of the deposits, the level of use of the contracted lines and limits;
- Analyses and makes comparisons regarding the interest rates practiced on the market and those practiced by the bank and makes proposals to modify them;



- Analyses and approves the prices of new products / services and / or price changes of existing products/ services, based on the economic assumptions of the respective business lines, as well as the way in which profitability will be improved by selling new products. For this purpose, the product/service owner, or the secretary in their absence, will present to the committee, during the meeting, the Executive Committee minutes regarding the new products/services under discussion or the modification of existing ones, including the opinions of all departments involved.
- In fulfilling the attributions mentioned above, the Committee ensures the fulfilment of strategies and policies, at the level of the Management Committee or of the Board of Directors;
- Analyses the Bank's liquidity position, through internal reports;
- Performs various liquidity simulations;
- Proposes and approves appropriate measures in case of deviations from the proposed level of liquidity indicators.
- Establishes the level of standard prices for commercial assets and liabilities and the level of fees and commissions.

b. Credit Committee

The Credit Committee is the main body of the Bank which has the competence to evaluate and approve or reject retail loan applications within the limits of the committee's competence.

The Credit Committee's duties and responsibilities:

The Credit Committee has the authority to decide on the following matters, without being limited to them:

- Approving or rejecting credit proposals for Corporate, Agri, and Retail clients that fall within the local approval limits (of the Credit Committee) or within the higher approval authorities, in accordance with the Bank's procedures;
- Approving or rejecting restructuring proposals for Corporate, Agri, and Retail clients, managed both at the business line level and within the Debt Collection Department, in line with the established approval authority limits;
- Approving or rejecting any changes to previously approved terms and conditions, including but not limited to the modification and release of collateral (except for the release of collateral within the normal course of business, such as upon loan maturity);
- Approving proposals for transferring Corporate and Agri clients from the business lines to the portfolio managed by the Debt Collection Department;
- Any matter related to the approval of credit facilities.

c. Retail Credit Committee

The Retail Credit Committee is the main body of the Bank which has the competence to evaluate and approve or reject retail loan applications within the limits of the committee's competence.

Authority

The Board of Administrators authorize the Retail Credit Committee to approve credit applications within its limit of authority and to initiate any activity it seems appropriate and within its terms of reference.



If the request is within the limits of the Committee and rejected by the committee, will not be forwarded to higher Approving Authority for evaluation.

d. Classified Credits Committee

The Classified Credits Committee reviews the credit files that are in the portfolio of the Debt Collection Department or the Corporate/AGRI Department and that have payment arrears exceeding 60 days as of the date on which the committee meets.

The Committee's attributions:

Within the Classified Credits Committee the following actions take place:

- Analyzes the credit files that are in the portfolio of the Debt Collection Department or the Corporate Department/AGRI Department and records payment arrears greater than 60 days on the date the committee meets
- Presentation of the report at portfolio level (for all outstanding clients who are at least one day late), identifying the monthly evolution of the main risk-generating elements, classified as follows:
 - Monthly portfolio evolution analysis detailed by individuals/ legal entities;
 - Monthly portfolio evolution analysis, detailed by tranches of days of delay taking into account the volume of loans to individuals/ legal entities;
 - Monthly analysis of the degree of coverage with guarantees by portfolio, taking into account the volume of loans to individuals/ legal entities
- Presentation of the quarterly report regarding the cases transferred in off-balance sheet, which will include:
 - Quarterly deposits made for the current year in the case of off-balance sheet exposures classified according to the main categories of clients depending on the stage of legal proceedings and expectations of debt recovery;
 - Quarterly deposits estimated until the end of the current year in the case of the off-balance sheet exposures classified on the main categories of clients ;
 - Incasarile trimestriale estimate pana la finele anului in curs in cazul expunerilor scoase in afara bilantului classified according to the main categories of clients depending on the stage of legal proceedings and expectations of debt recovery.
- Monthly analysis of risk indicators for debt collection activity;
- Approval of the actions below, but not limited to:
 - Stating the early maturity of credit facilities for the analyzed clients;
 - Transferring a legal entity client from the Corporate Department and/or the Agri Department to the Debt Collection Department;
 - Initiating the forced execution procedure for the analyzed clients

e. Information Security Committee & Access Control Committee

The Information Security and Access Control Committee provides support to the Information Security



Unit, proposes the strategic and tactical direction for security initiatives and activities, recommends policies for ensuring information security, promotes security awareness, and monitors the implementation of security policies within the Bank.

The Committee's attributions:

- Proposes the strategic and tactical direction for information security initiatives and activities;
- Ensures that security initiatives (present and future) are aligned and support the achievement of business objectives;
- Is informed about the results of the activities carried out by the Information Security Unit and makes the necessary decisions regarding the scope of activities and the direction of topics discussed within the committee;
- Identifies areas in which Information Security Unit may be involved, as well as its degree of involvement;
- Reviews and validates, for submission for approval, the security requirements presented by the Information Security Unit;
- Analyses and validates, for submission for approval in the Board of Directors the annual plans prepared by the Information Security Unit;
- Communicates to the Management Committee the security objectives and issues;
- Discusses technical and business information within policies, procedures or issues / vulnerabilities / risks in terms of information security;
- Initiates and monitors the process of defining, developing, implementing and maintaining information security, policies, procedures and security standards;
- Analyses and validates for submission for pre-approval to the Management Committee and approval to the Board of Directors, any exceptions to the information security policy;
Analyses the cases of information security breach, as defined in the current policies and procedures in force, and proposes the plan to remedy the security breaches;
- Validates, for submission for approval in the Management Committee the training programs developed by the Information Security Unit, as well as their frequency;
- Recommends and implements measures regarding information security in all bank departments/entities of the Bank;
- Analyses and validates, for submission for approval or rejection of new profiles/ roles for end users within the IT Systems/ applications used by the Bank, or requests the updating / modification of existing ones;
- Analyses, and recommends the approval or rejection of requests for exceptions for access to various ICT systems/ applications, which are not in accordance with the provisions of the Information Security Policies and Procedures..
- Debates risks related to the Bank's information security and establishes security objectives;
- Monitors the Bank's exposure to existing and potential cyber threats and risks, and approves the necessary measures and action plans;
- Ensures that the digital operational resilience strategy and the IT strategy are aligned with the standards imposed by Bank management and applicable legislation.



f. Business Continuity and Crisis Management Committee

The Business Continuity and Crisis Management Committee ensures the existence of policies and procedures for Crisis Management, evaluates the results of Continuity and Disaster Recovery tests, validates the planning of test scenarios for business continuity and debates reports of incidents that have affected the continuity of critical activities, as specified in the Business Continuity Plan.

The Committee's attributions:

- Validates and monitors the implementation of the Bank's Business Continuity Plan.
- Analyzes incidents that occur that affect critical business continuity as specified in the Business Continuity Plan for the affected departments/services;
- Ensures the control, management and review of the continuity plan, which will be implemented in the bank, so that corrective action is taken immediately in case of weaknesses;
- Provides information as necessary to fulfil the duties;
- In case of initiating an action plan and/or a Continuity Plan, inform, if necessary, the authority concerned.
- Presents an Annual Report to the Management Committee, evaluating:
 - The effectiveness of the Business Continuity (BCP) and Disaster Recovery (DRP) policies and procedures;
 - The adequacy of the measures taken to mitigate risks (likelihood and continuity), as reflected in controls, assessments, and improvement recommendations from participants in BCP & DRP tests.

g. Health and Safety Committee

The Committee's attributions:

- Analyses and makes proposals regarding the protection plan, according to the applicable legal provisions and internal regulations;
- Elaborates and follows the realization of the prevention and protection plan, including the allocation of the necessary means to realize its provisions and their efficiency from the point of view of the improvement of the working conditions;
- Analyses the risk factors for accidents and occupational diseases existing at work and takes the necessary prophylaxis measures;
- Analyses the introduction of new technologies, the choice of equipment, taking into account the consequences on the safety and health of employees' and makes proposals in the situation of finding certain deficiencies;
- Analyses the choice, purchase, maintenance and use of work equipment, collective and individual protection equipment;
- Analyses the way of fulfilling the attributions that belong to the external service of prevention and protection;
- Proposes measures for arranging jobs, taking into account the presence of groups sensitive to specific risks;
- Analyses the requests made by the employees' regarding the working conditions and the way in which the persons designated with occupational safety and health attributions at the level of the bank and the external prevention and protection service fulfill their attributions;



- Follows the manner in which the legal regulations regarding safety and health at work, the measures ordered by the labor inspector and the sanitary inspectors are applied and observed;
- Analyses the employees' proposals regarding the prevention of work accidents and occupational diseases, as well as for the improvement of working conditions and proposes their introduction in the prevention and protection plan;
- Analyses the causes of accidents at work, occupational diseases and events and may propose technical measures to supplement the measures ordered following the research;
- Carries out its own inspections, through its members, regarding employees' application and compliance with the specific workplace instructions, and, where necessary, prepares a written report on the findings;
- Receives the written report presented by the Bank's management (at least once a year) regarding the status of occupational health and safety, the actions undertaken and their effectiveness during the previous year, as well as the proposals for the prevention and protection plan to be implemented in the following year.
- After approval, the employer's report must be submitted by the Secretary to the Territorial Labor Inspectorate within 10 calendar days.

h. Projects and technology committee

The objective of the Projects & Technology Committee creates the necessary framework for the centralized management of existing projects or to identify new projects, in accordance with the bank's strategy and the efficient usage of resources involved in projects.



The attributions and responsibilities of the Committee are as follows:

- Identifies the Bank's Strategic Projects, appoints the Project Sponsors and the project owners for each project;
- Proposes for endorsement the Bank's Projects and Technology budgets, including those for ICT projects;
- Proposes the initiation of a project based on a business case prepared by the Project Owners who submitted the proposal to the committee;
- Approves project plans, including those for ICT projects;
- Approves the composition of project teams, ensuring an appropriate allocation of responsibilities and the efficient use of available internal or external human resources;
- Monitors and ensures compliance with the formalized project management framework;
- Analyzes and prioritizes Projects and Change Requests submitted by internal clients (business lines and support departments), in accordance with available technical resources;
- Reviews any technological development that may improve the Bank's market position by enhancing the services offered;
- Ensures alignment of project objectives with the Bank's strategic objectives;
- Ensures that the Bank has approved and documented models and methodologies for the design and development of technological systems, as well as for their daily operation and support;



- Monitors project progress, proposes corrective actions when necessary, and requests that sponsors of major/strategic projects report to the committee on their project status;
- Analyzes and proposes approval of project expenditures when they exceed the initially approved limits;
- Ensures that upon completion of each project, the Project Managers together with the Project Owner submit a Project Closure Report to the Bank's Management. The benefits resulting from the project are documented and presented to the committee;
- Analyzes and monitors the improvement of banking and ICT service quality, ensuring the availability and security of the support provided to the Bank's operational activities, as well as compliance with applicable regulations;
- To support the principles of "Security and Privacy by Design," the Projects and Technology Committee may review information that contributes to an adequate assessment of information security/ICT system risks and personal data protection, ensuring that security recommendations are considered from the project design and initiation phase;
- Monitors the implementation of the projects defined in the IT Strategy.

i. Assets Administration Committee

The Assets Administration Committee is responsible for adopting resolutions regarding measures and strategies limited to the loan portfolio of Eurobank S.A., administered by the Bank under the Administration Agreement ("SLA") concluded between the Bank, as the Service Provider, and Eurobank S.A., as the Beneficiary.

The Committee's attributions:

In accordance with the competence limits granted, the Assets Administration Committee has the authority to adopt resolutions regarding the following:

- a) Decides/endorsees the general or specific strategies to be applied in relation to the clients within the portfolio administered for Eurobank that fall under the scope of the SLA;
- b) Endorses proposals for partial or total write-offs of claims, or proposals that include a component of debt forgiveness/discounts/reversal of accrued accessories;
- c) Approves/endorsees the general strategy or action plan proposed for each individual case and/or the specific proposal regarding:
 - i) Restructuring or rescheduling of loan facilities within the servicing perimeter;
 - ii) Currency conversion of loans;
 - iii) Amicable enforcement or realization of collateral for the recovery of claims (in whole or in part);
 - iv) Acceleration of loans and initiation of legal recovery actions;
 - v) Proposals to stop the calculation of accessories; vi) Proposals regarding amicable payment arrangements;
 - vii) Payment agreements concluded with debtors within judicial proceedings;
 - viii) Collateral sale strategy in auctions organized within foreclosure or bankruptcy proceedings: reduction of starting price (bankruptcy); intervention thresholds; strategies for asset acquisition by Eurobank in settlement of the claim, where applicable;
 - ix) Voting strategy within the Creditors' Assembly in insolvency proceedings;



- x) Proposals for claim sales / claim assignment transactions;
- d) Approves the costs to be borne by Eurobank under the mechanism defined in the SLA associated with any of the above.

j. Data Governance Committee

Data Governance Committee establishes data governance policies and standards, ensuring alignment with the Bank's objectives. It assesses and prioritizes critical bank data in the area of data quality management, regularly reviews the status of data quality and provides support for data quality improvement initiatives.

The Committee's attributions:

- Approving the fundamental aspects of the data governance and data quality management strategy ensuring alignment with the Bank's objectives, Basel principles and regulatory requirements issued by the National Bank of Romania;
- Establishing the data management vision and objectives, integrating with the risk strategy and IT strategy;
- Regularly assessing and approving the data domains /critical data elements that will be in the scope of the Data Quality Management Program in the coming period;
- Approving the data owners for the data domains/critical data elements that will be in the scope of the Data Quality Management Program;
- Analysing the quarterly reports and communications of the Data Governance Department, which show the current status, progress and success stories related to data quality, as well as any relevant information about the appointment of new colleagues in relevant roles, changes in technological capabilities, etc;
- Oversees the resolution of critical data quality issues and cross-functional data disputes that may impact financial and regulatory reporting processes;
- Oversees projects related to data automation and reporting, and establishing appropriate internal controls;
- Provides executive sponsorship for data governance and data quality initiatives;
- Promote data governance culture and awareness across the organization by approving training and communication plans;
- Review the results of internal audits or external oversight missions related to data management and approve action plans based on findings;
- Endorsement of data model harmonization initiatives;
- Support the alignment of data governance practices with IT architecture and systems development processes/projects.

3.2 Corporate governance

Vista Bank (Romania) S.A. has developed and permanently updated an internal system of corporate governance with the purpose to follow the fulfilment of the interests of all relevant parties: shareholders, employees, providers, administrators, and clients etc., being a mechanism for monitoring the Bank's actions, policies and decisions.

The Bank's corporate governance framework has the following principal elements:



- The Bank's constitutive deed – document that defines the Bank's object of activity, the relations between the shareholders, the management and Administrators bodies and the competences granted to them, as well as the main directions on the representation, control and financial Administrators;
- The management frame, periodically evaluated and properly revised, containing the concept on the bank's structure and organization (at level of Head Office and of the branches/ agencies network), management bodies and management levels, as well as the related principles and functioning rules;
- The Internal Functioning and Organization Regulation
- The internal control system with the 3 components, i.e., the internal audit, compliance and risk management activities;
- The Policy for Management of Significant Risks
- The Risk Strategy
- The Policy for Operational Risk
- The Fraud Management Policy
- The Compliance Policy
- The Money Laundering and Terrorist Financing Risk Management and Mitigation Policy
- The Conflicts of Interest Policy
- The Whistleblowing Policy
- The Code of Ethics and conduct
- The system of delegating the authority limits for decision and signing of the patrimony related documents
- The communication principles with shareholders, clients, employees, public and regulatory institutions.
- Digital Operational Resilience Strategy
- General Information Security Policy

The Policy for Management of Significant Risks

The policy regarding the management of significant risks was concluded in order to settle the general frame for the management of significant risks within the Bank, according to the provisions of the EGO no. 99/2006 with its further amendments of the regulations issued by the European Parliament and Council, of the NBR Norms Regulations and of all the Internal Regulations of the Bank.

The following types of significant risks are treated: credit risk, residual risk, concentration risk, risk arising from currency lending to unhedged borrowers, market risk (foreign exchange risk), interest rate risk from non-trading activities, liquidity risk, operational risk (including model risk), legal risk and reputational risk, compliance risk, information and communication technology (ICT) and security risk, strategic and business risk, risk associated with outsourcing activities, excessive leverage risk, uncontrollable risk, settlement risk, environmental, social and governance risks.

The Risk Strategy

The strategy regarding the management of significant risks was concluded in order to establish the risk profile of the Bank and to settle the general frame for the management of significant risks within the Bank, according to the provisions of the EGO no. 99/2006, as further amended, of the NBR Norms and Regulations, of the European Directives and regulations and of all the Internal Procedures of the Bank.

In order to establish the significant risks, the Bank performed a comprehensive internal risk assessment, as an integral part of the Internal Capital and Liquidity Adequacy Assessment Process.



Through this process all material risks of the Bank along with the relevant management activities were identified.

In order to monitor and mitigate the significant risks, the Bank has established internal limits which are permanently monitored.

The Policy for Operational Risk

This internal regulation has the role to establish the methodology for the management of the operational risk, meaning the identification, assessment and control of such risk.

In order to achieve the objectives, set for an efficient management of operational risks, the Bank has established the following modalities, in accordance with the methodology based on risk identification:

- Risk and control self-assessment (RCSA) workshops
- Risk awareness training programs
- Collection of Operational Loss Data (Operational Loss Database)
- Setting up of key risk indicators (KRIs)

A key characteristic of proper Operational Risk Management is that it involves the entire spectrum of Bank's activities.

Hence, the management of Operational Risk is the responsibility of all managers and staff members of the Bank (risk ownership).

The Fraud Management Policy

The purpose of the current Policy is to set out the basic principles underlying the management of fraud risk within the Bank.

The underlying aim is to minimize the impact of possible fraud related losses.

Fraud risk is an important risk facing the bank and financial institutions in general, particularly in the current economic environment.

The risk of fraud is one of the most important risks facing a bank both in terms of potential number of events as well as total cost. A serious fraud incident can damage an organization severely, not only in terms of direct monetary loss but also in terms of reputation, trust, loss of morale, loss of business and other indirect/ opportunity costs.

A fraud incident may severely impact customer perceptions, lead to regulatory penalties and constraints and lead to significant time and resource impacts on investigations and incident management.

Fraud can originate from a multitude of sources within and outside an organization.

Although no organization can assume that its internal controls and other safeguards can provide total protection from the risk of fraud, such controls should be as effective and as comprehensive as possible to mitigate this important risk.

It is generally accepted that individuals who commit fraud do so when three factors are present: opportunity, pressure and rationalization.

The Compliance Policy

The Compliance Policy is the internal document that presents the vision, strategy and values underlying the compliance activities of Vista Bank (Romania) S.A. (Bank). The Policy ensures the organization of a permanent Compliance Function and regulates its status, purpose and role, as well as the basic principles of compliance risk management to be followed at the Bank by all staff.

The Money Laundering and Terrorist Financing Risk Management and Mitigation Policy



The policy to prevent the use of the financial system for laundering of proceeds from criminal activities and terrorist financing aims at establishing the internal framework to manage the risks associated with money laundering and terrorist financing, including avoiding the involvement of the Bank in illegal operations. The Bank's involvement in money laundering and terrorist financing activities may entail a significant reputational risk that translates into losses and sanctions imposed by the special legislation applicable in Romania. In order to protect against these risks, the Bank has a legitimate interest in ensuring that banking operations carried out through clients' accounts are transactions and activities with a legitimate economic, commercial and legal purpose.

The Code of Ethics and Conduct

The Code of Ethics and Conduct aims to ensure impartial and constructive behaviour of all Bank employees based on moral principles and defines the framework within which all employees must behave, bearing in mind that their entire conduct reflects their personal image, that of their colleagues, as well as that of the Bank in general. .

The Code of Ethics and Conduct is part of VISTA Bank (Romania) SA's commitment to integrity. This Code focuses on areas of ethical risk, provides guidance to assist in recognising and addressing ethical issues and contributes to strengthening a culture of honesty and accountability.

The Policy on Conflicts of Interest

The scope of the Policy on Conflicts of Interest is to ensure the Bank's compliance with applicable legal provisions and protection of reputation by establishing basic requirements for the prevention, identification and management of conflicts of interest.

In this respect, the Bank implemented the following measures:

- Prevention of potential conflicts of interest that may adversely affect the interests of the Bank or its customers. Such measures include the possibility of declining to conduct transactions or refusing to provide services;
- Identifying current and potential conflicts of interest within the Bank's activities, as well as reducing the related risks;
- Protecting the interests of the Bank's clients in all activities and maintaining the confidentiality of information at all levels;
- Respect for transparency and integrity;
- Establishing principles for conducting personal transactions (including by the members of the Board of Administrators, managers, employees and other persons related to them), in order to ensure compliance with the legal and regulatory framework.

The objectives of the policy are to strengthen the bank's internal control framework by:

- a) identifying potential areas (relationships, services, activities, transactions) of conflicts of interest between Bank employees, companies owned by them, their relatives and the Bank;
- b) establish measures and procedures for the prevention and management of conflicts of interest (barriers to the flow of information, appropriate segregation of duties, etc.);
- c) assigning roles and responsibilities for the implementation of this policy;
- d) ensuring compliance with the relevant legislative and regulatory framework at national and European level

The Whistleblowing Policy

The Whistleblowing Policy sets out the principles adopted by Vista Bank with regard to reports made by bank staff, suppliers or customers, regarding the observation of violations of legislation or internal



regulations that may have a significant negative impact on the Bank, of improper conduct by employees that may be considered contrary to the provisions mentioned in the Code of Ethics and Conduct of VISTA BANK SA.

The purpose of this policy is to put in place a system whereby employees can report misconduct confidentially, in good faith, with the person reporting being assured of the highest possible level of protection against any form of retaliation that may occur as a result of their reporting.

Vista Bank (Romania) S.A. is committed to the highest standards of honesty, openness, transparency and accountability.

The Bank has established this Policy to provide a basic framework for employees, external suppliers and any contracting parties, including customers, to bring to the attention of the Management Body, activities that constitute unlawful conduct or negligence in service.

Digital Operational Resilience Strategy

The purpose of the „Digital Operational Resilience Strategy” is to establish the implementation of the ICT risk management framework including the methods for achieving ICT objectives, such as the needs for the Bank’s information and communications technology (ICT) infrastructure to be able to resist, adapt and recover from major incidents, while supporting the business strategy and objectives.

The “Digital Operational Resilience Strategy” has been issued in accordance with the Bank’s Business Strategy, Risk Strategy, as well as based on the provisions of Regulation (EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience of the financial sector (“DORA”).

General Information Security Policy

The purpose of the “General Information Security Policy” is to support the “Digital Operational Resilience Strategy” and the “Bank’s Business Strategy” by ensuring the implementation of an information security risk management framework that ensures the confidentiality, integrity and availability of information and ICT systems and the digital operational resilience of the Bank’s ICT systems and business activities. The General Information Security Policy provides direction and support on information security and ICT security issues in accordance with business requirements, legal requirements and regulations in force, being aligned with best practices and information security standards.

4. APECTS REGARDING THE STRATEGY AND ORGANISATIONAL STRUCTURE OF THE BANK

4.1 Bank Strategy

Vista Bank business strategy follows the business model that includes main targeted market segments.

Vista Bank (Romania) S.A. is a universal bank that places (according to its estimations) as at 31.12.2025 the 14th position in the Romanian Banking System with 1.15%-1.2% market share, after the merger with Credit Agricole Bank Romania S.A. in October 2022.

The Bank provides a complete range of products and services to private individuals, small and medium-sized enterprises (SMEs) and large companies, via banking outlets, as distribution channels.

Vista Bank (Romania) SA customers includes Romanian companies as well as subsidiaries of foreign Groups on Corporate Business and Romanian individuals and foreign citizens on Retail Banking Business. In Romania, Vista Bank operates through a network of 35 units that covers 23 cities across the country, the biggest territorial concentration being in Bucharest.

The following elements represent the foundation of Vista bank’s Strategy:



1. Building long-term value added for shareholders, employees and clients to be achieved by providing high quality services with a team of well-trained and dedicated professionals who work in an environment that enables them to excel.

2. Culture and values;

- Honesty and integrity;
- Credibility;
- Fairness and respect;
- High Quality Service;
- Staff Professionalism;
- Social responsibility.

4.2 Shareholders' Structure

During 2025 there have not been major changes regarding the shareholders structure of the bank, except for the redemption by Vista Bank of the shares held by an individual shareholder, representing 0.04591% of the share capital.

The share capital subscribed and paid-up of the Bank at 31.12.2025 registered with the Trade Register was RON 468,736,524.4.

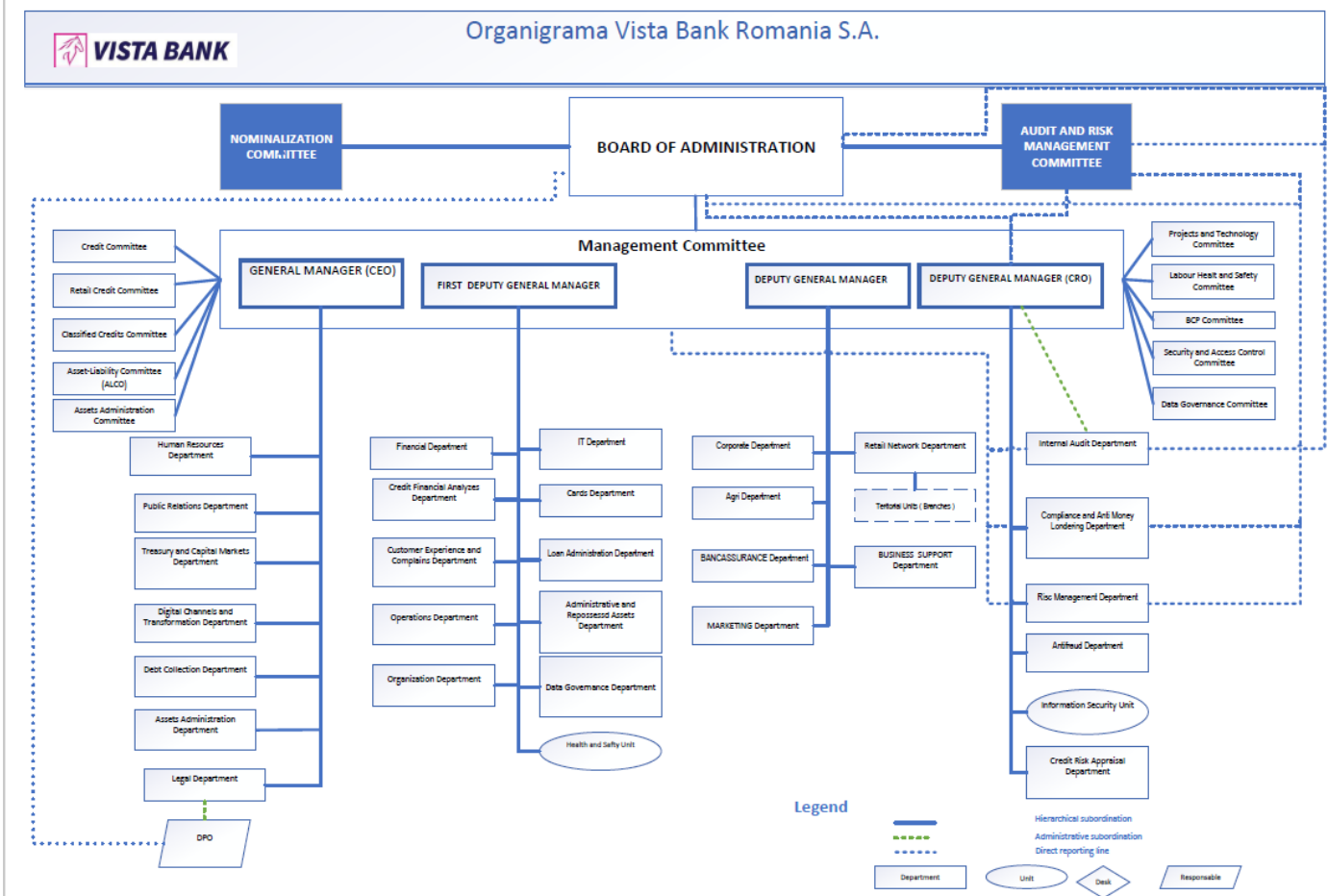
4.3 Organisational Structure of Vista Bank (Romania) S.A.

The Bank's Organization Chart is defined to have an adequate and transparent organizational structure. The Bank's Organizational Chart must promote the efficiency and has as foundation the prudentially principles.

The Chief Executive Officer, the First Deputy Chief Executive Officer and two Deputy Chief Executive Officer, all members of the Management Committee, being organized in departments at the Head Office level and network units' countrywide, manage the Bank. The territorial unit is represented by the branch/business center.

The departments can be organized in services, depending on the characteristics of the activity carried out. The Board of Administrators approves the organization of such units.

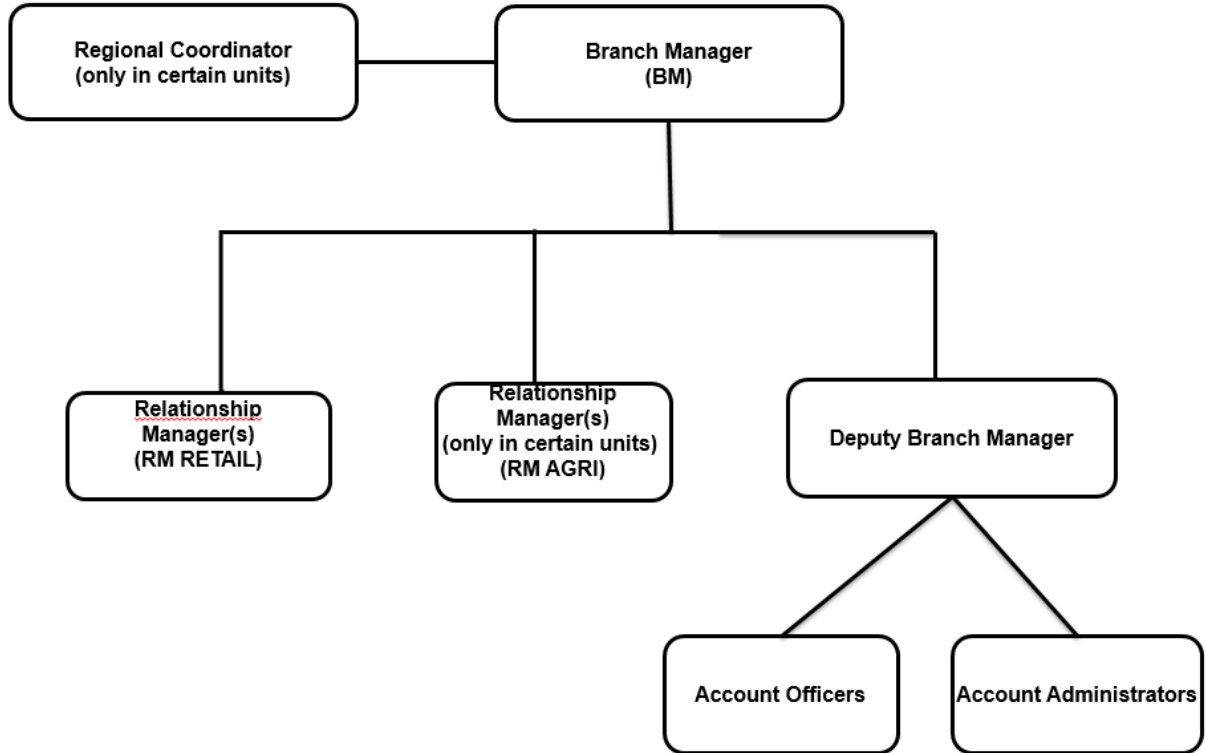
The organizational structure of the bank is described in the organizational chart of the Bank, which describes in detail the internal structure of the Headquarters, the subordination of the committees and the structure of the territorial units.



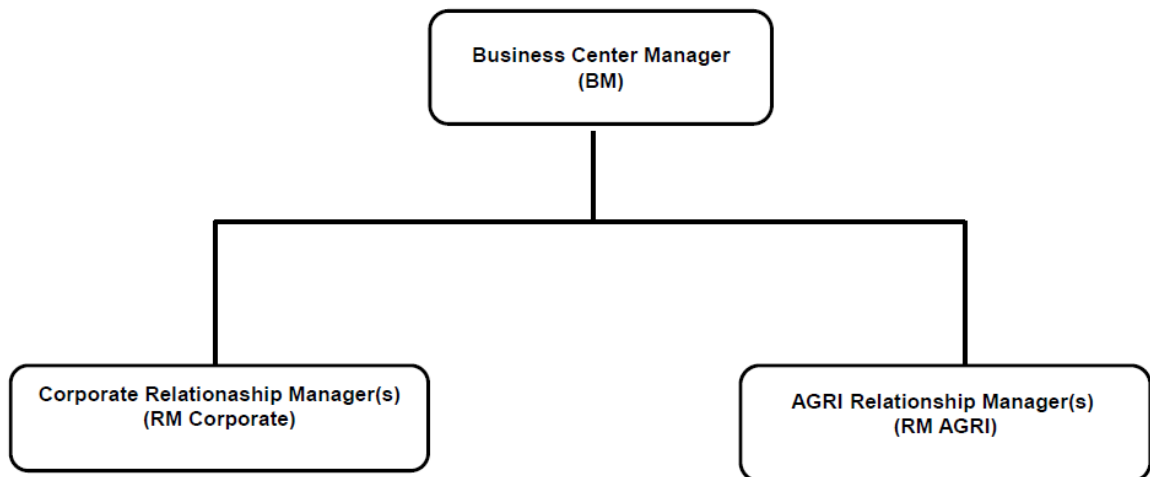
In addition, the Bank Network included in 2025 a number of 35 territorial units in Romania, with the following organizational structure:



VISTA Bank (Romania)S.A. – Territorial units Organizational Chart



VISTA Bank (Romania)S.A. Business Center Organizational Chart





4.4. Organization of the management structure

Vista Bank (Romania) S.A. operates under a unitary governance structure, with the management and administration of the Bank being entrusted to a Board of Directors (BoD), as the governing body in a supervisory capacity, which is responsible for the oversight of the Bank's activities as implemented by the Management Committee (Senior Management) which provides the operational management of the Bank. Both structures carry out their activities in accordance with the provisions of the regulations in force and the Articles of Incorporation.

The Board of Directors is currently composed of 7 members (according to the articles of association it consists of 5 to 9 members) appointed by the General Meeting of Shareholders, of which two are executive members. The Board of Directors has two advisory committees whose members do not have executive functions. - Audit and Administration Committee, Nomination Committee.

The management function is exercised by the Chief Executive Officer, the First Deputy Chief Executive Officer and two (2) Deputy Chief Executive Officers.

The Management Committee is composed of the Directors of the Bank, namely: the Chairman is the General Manager and the members are the First Deputy General Manager and 2 (two) Deputy General Managers.

The Deputy General Manager (CRO) in his capacity as Compliance Officer of the Bank (pursuant to Art.23., para.2. of Law no.129/2019) has the following responsibilities:

- coordinates the organisation and implementation of legislative requirements in the field of prevention and combating money laundering and terrorist financing;
- coordinates the implementation of the appropriate internal regulations on customer due diligence and the prevention and combating of money laundering and terrorist financing;
- oversees the development of appropriate internal regulations on customer due diligence, secondary and operational reporting and record keeping, internal control, risk assessment and management, compliance management and communication to prevent and deter suspicious money laundering and terrorist financing operations;
- monitors the bank's compliance with legislation in the area of preventing and combating money laundering and terrorist financing;
- coordinates activities arising from legislative requirements.

4.4.1 Supervisory function bodies

The Board of Administrators is currently composed of 7 members (according to the articles of association it consists of 5 to 9 members) appointed by the General Assembly of the Shareholders and approved by the National Bank of Romania. The Board of Administrators approves the Bank's strategy, products and new services to be offered, internal regulations, organization of the Bank and its development in accordance with the strategy in force. The Board of Administrators approves the annual budget and monitors the Bank's financial results and the activity of the Management Committee.

The provisions of Company Law no. 31/1990 as amended and supplemented, regulations issued by the National Bank of Romania, internal norms and procedures of the Bank, including but not limited to the Internal Functioning and Organization Regulation and the Regulation of the Board of Administrators govern the Board's activity.

As of 31.12.2025, the Board was composed of the following Members:



Nr crt	Name	Function	Gender
1.	Stavros Lekkakos	President (Independent)	Male
2.	IliasIlias Volonasis	Member (Independent)	Male
3.	Georgios Athanasopoulos	Member	Male
4.	Theodor Cornel Stanescu	Member	Male
5.	Pavlina Tavridaki	Member (Independent)	Female
6.	Theodoros Efthys	Member (Independent)	Male
7.	Panagiotis Konstantaras	Member (Independent)	Male

The Board members have participated actively and effectively in the exercise of their responsibilities during 2025, the Board holding 49 meetings. Meetings were held with the participation of membership required for the meeting according to the legal provisions in force and the Bank’s Constitutive Deeds.

4.4.2 Management function bodies

The Management Committee consists of Bank’s Directors, respectively the CEO, a First Deputy CEO and the 2 (two) Deputy CEO which are appointed by the Board of Administrators and approved by the National Bank of Romania. The CEO and the First Deputy CEO hold also the position of Members of the Board of Administrators of the Bank. The Meetings of the Management Committee are very frequent, the Committee having responsibilities for the management of the current activity of the Bank.

As of 31.12.2025, the structure of the Management Committee was the following:

- Mr. Georgios Athanasopoulos CEO
- Mr. Theodor Cornel Stanescu First Deputy CEO
- Mr. Ovidiu Craciunas Deputy CEO
- Mr.Periklis Voulgaris Deputy CEO

The duties and responsibilities of the bodies that provide the management function, respectively the Directors members of the Management Committee are detailed in the Bank's Constitutive Deeds, the Regulation of the Management Committee and the Internal Functioning and Organization Regulation.

4.4.3 Number of mandates held by the members of the management structure

Members of the Bank's management structure hold the following mandates:

Nr crt	Name	Function	Mandates within the Bank	Period
1.	Stavros Lekkakos	President	4	2019-2020;2020-2024;2024-2028
2.	Ilias Volonasis	Member	3	16.04.2020;2020-2024;2024-2028
3.	Georgios Athanasopoulos	Member	17	2010-2020;2020-2024; 2024-2028
4.	Theodor Cornel Stanescu	Member	4	2018-2019;2019-2020;20202024;2024-2028
5.	Pavlina Tavridaki	Member	4	2019-2020;2020-2024; 2024-2028



Nr crt	Name	Function	Mandates within the Bank	Period
6.	Theodoros Efthys	Membru	4	2019-2020; 2020-2024;2024-2028
7.	Panagiotis Konstantaras	Member	3	05.05.2020;2020-2024;2024-2028

- The Chairman of the Board holds a non-executive mandate (as chairman of the board);
- Each of the Board members holds one non-executive mandate, with the exception of the CEO and First Deputy CEO who, in addition to a non-executive mandate (as a member of the board) hold also an executive mandate (Georgios Athanasopoulos as CEO of Vista Bank (Romania) SA and Theodor Cornel Stanescu as First Deputy CEO of Vista Bank (Romania) SA).

Members of the management structure hold, at collective level, the knowledge, skills and adequate experience to be able to understand bank activities, including its major risks so they can take decisions being fully informed on all aspects of which must decide according to their competences.

4.4.4 The recruitment policy for the selection of members of the management structure and the knowledge, skills and their effective expertise

The activities related to recruitment and selection of the employees and the members of the management structure are performed in accordance with current Romanian legislation and practices, the collective agreement (if available) and bank's policies and procedures, and in a manner which ensures the suitability and integrity of the new recruit.

When establishing the composition of the Board of Administrators members and Executive Management of the Bank are taken into account the requirements and criteria provided by the applicable legislation for the companies, as well as special legal provisions for credit institutions, taking into account that there is always an adequate number of members and an appropriate structure which contains a sufficiently wide range of relevant professional experience.

The BOA members and Executive Management of the Bank must have, collectively, knowledge, skills and experience to be able to understand the activities of the bank, including their major risks and to decide in full knowledge on all aspects according to their competencies.

The members of The BOA and Executive Management of the Bank are evaluated, pursuing the fulfilment of the conditions and criteria mentioned above, if a future reevaluation of the members' adequacy is performed when certain events take place that request this action.

The Bank has a Board of Administrators whose members does the General Shareholders Assembly appoint and which exercises all the duties and competencies stipulated by the law on the trading companies and banking legislation, with the purpose of performing the bank object of activity.

The persons appointed as members to the BOA must have reputation and experience adequate to the nature, extent and complexity of the Bank's activity as well as to the assigned responsibilities, in order to ensure a sound and prudent bank management.

They must have an academic degree in related fields such as economics, finance, accounting or legal etc., as well as experience directly relating to the Bank's activities. The persons appointed must be fluent in the English language.



The Executive Management and the members of the Board of Administrators must be approved by the National Bank of Romania prior to exercising their responsibilities, according to the legal requirements issued in this respect.

The persons appointed to the Executive Management and as members to the BOA must have good knowledge of the strategy, practices, policies of the Bank, as well as, the legislation and regulations in force in the financial-banking sector.

They must be able to take decisions and make their own judgments to be reliable, objective and independent

4.4.5 The policy regarding the diversity in the selection of members of the management structure, objectives and any relevant targets set out in the policy, and the extent to which they achieved the objectives and the respective targets

Bank considers diversity of the members of the management body as sum of characteristics like age, gender, geographical provenance and educational and professional background, and takes the necessary actions to ensure these are different to an extent that allows a variety of views within the management body.

The Bank shows considerable care so that diversity amongst its top leaders is ensured with the purpose to improve decision-making regarding strategies and risks by facilitating a broader range of views, opinions, experience, perception, values and backgrounds and reduces the phenomena of ‘group think’ and ‘herd behaviour’ in the process of decision-making.

The nominees as member of the Board/Executive management of the Bank must prove adequate reputation and prior experience in direct relation to the nature and complex activity of the Bank, as well as the allocated responsibilities in order to ensure a proper and prudent management of the Bank.

All Board and Management Team appointments are based on meritocracy with the prime consideration to maintain and enhance the Board’s and Management’s overall effectiveness.

The selection of female candidates to join the Board of Administrators/Executive Management will depend on the pool of female candidates with the necessary qualifications: knowledge of the strategy, practices, policies of the Bank, as well as, the legislation and regulations in force in the financial-banking sector.

The ultimate decision will be based on merit and contribution the selected candidate will bring to the Board of Administrators/ Executive Management.

We believe that diversity, including gender diversity, is a very important factor, which reflects in the Bank’s performance and effectiveness. In this respect, the Gender diversity policy has been updated and approved by the Board of Administrators and the Bank set as target appointment of at least one feminine person within the Board of Administrators/ Management Committee.

4.4.6 Organization of the Internal Control Functions

The internal control framework targets the institution as a whole, including the activities of all operational units, of the support and control functions and consists of appropriate internal regulations, mechanisms and appropriate plans that contribute to identifying the internal and external risks to which the bank is exposed.

For a prudent management of these risks, the central organizational unit that manages an area of activity of the bank, elaborates and implements internal regulations corresponding to the managed activity formalizing all processes and control activities to be carried out within respective area of activity.

The organizational units and the support functions have the main responsibility for establishing and



maintaining adequate internal control procedures.

In order to provide the framework for the internal control, the verification and validation of compliance with these policies and procedures by the independent control functions, is mandatory.

Within Vista Bank (Romania) SA Internal Control is structured on three levels:

The first level of controls is implemented to ensure that the Bank's current activities and operations are properly performed, in accordance with internal legislation and procedures. The controls are carried out by the structures within which the daily activities, respectively territorial units, business departments and their support are carried out.

The second level of control is:

- a) The Risk Management function (ensures identification, measurement, evaluation, management, monitoring and reporting off all risks);
- b) The Compliance function (identifies, evaluates, monitors and reports the related compliance risks of the activities performed at the Bank level);
- c) The Antifraud function (prevention, monitors, decrease and recovery of losses from any fraudulent transaction directed against at the Bank or their clients)

The third level of controls is represented by the Internal Audit function, which carries out an independent assessment, based on a risk-based approach, and provides objective assurance on the compliance of all activities, including outsourced activities, with the Bank's policies and procedures; ensures that the Bank's policies and processes are respected in all activities and structures; it reviews the control policies, processes and mechanisms so that they remain sufficient and appropriate to the Bank's activity.

The functions of the Bank's Internal Control System are independent of the lines of activity that they monitor and control.

Independent control functions

The risk management function is a central component within the Bank and is structured so that it can implement risk policies and control the risk management framework. The Bank is constantly concerned with strengthening the culture of risk management, extended to both the level of its structures, as well as at the level of the lines of activity.

The responsibility for risk management lies with the staff in all lines of activity, not being limited only to the level of specialists in the field of risks or control functions.

The risk management function shall ensure that all significant risks are properly identified, evaluated, measured, monitored, managed and reported and shall be actively involved in the development of the Bank's risk management strategy in all significant risk management decisions.

The general framework for risk management comprises the entire framework of policies, procedures and systems that allow the bank to prudently manage the potential risks that may be generated by the activity carried out, thus ensuring their inclusion in the Bank's risk appetite.

On each line of activity, risk management is ensured through various levers / instruments, among which: supervision / control provided by the Bank's management structure, the Bank's standing committees, segregation of responsibilities, the principle of double verification (of the four eyes), policies and procedures dedicated to each area of activity.

The Compliance function advises the management body on the provisions of the legal and regulatory framework and on the standards that the bank must meet and assesses the possible impact of any changes



in the legal and regulatory framework on the Bank's activities.

The compliance function is provided by the Compliance and Money Laundering Prevention Department (hereinafter referred to as the “Compliance Department”), which is responsible for managing the compliance risk within the Bank.

The role of the compliance function is to identify, assess, monitor and report on the compliance risk to the management body. The findings of the compliance function must be taken into account by the management body in the decision-making process.

The compliance function also has the role of verifying whether the new products and the new procedures are in accordance with the applicable regulatory framework in force.

The Antifraud function

The role of the antifraud function is to prevent, detect and manage the risk of fraud.

As well, the Antifraud function provide specialized advice on the internal regulatory framework and new banking products from the antifraud perspective.

The Internal Audit function assesses whether the quality level of the internal control framework is both effective and efficient.

The internal audit function assesses the compliance of the entire bank's activities and operational units (including the risk management function and the compliance function) with the credit institution's policies and procedures. In this sense, the internal audit function is independent of the other two control functions mentioned above.

The internal audit function also assesses whether existing policies and procedures remain appropriate and comply with the requirements of the legal and regulatory framework.

Control functions are set at an appropriate hierarchical level and direct reporting lines to the governing body in its supervisory function or through the Audit and Risk Management Committee in the case of the internal audit function are defined. The internal control functions shall periodically submit to the management body official reports on the major deficiencies identified. The type and frequency of these reports is defined in the specific regulations. These reports shall include follow-up to previous findings and, for any new major deficiencies identified, relevant risks involved, an impact assessment and recommendations. The management body must act on the findings of the control functions in a timely and effective manner and must request appropriate remedial action.

The departments at which the functions related to the internal control framework are exercised, respectively the Compliance and Anti Money Laundering Department, Risk Management Department and Antifraud Department are directly subordinated to the Deputy Chief Executive Officer (CRO) while the Internal Audit Department has a direct reporting line to the Board of Administrators through to the Audit and Risk Management Committee, being subordinated only from administrative perspective to the Deputy Chief Executive Officer (Chief Risk Officer).

In addition, one of the organizational principles of the Bank's internal control system includes the direct involvement of the Board of Administrators and the Management Committee in the organization and Administrators of the internal control system. The Management Body has the responsibility to ensure the independence of the three functions of internal control, to ensure that they have an adequate number of qualified staff with appropriate authority, that they benefit from continuous training, and the staff of these functions has at their disposal appropriate data and support systems, with access to internal and external information needed to fulfil their responsibilities.



The culture of the Internal Control System

The principles of the Bank's Management are based on promoting integrity and high ethical values, by developing a real control environment, defining and presenting to all employees the importance and role of each and everyone in the internal control processes.

The control environment is the basis of the other components of the internal control function.

In accordance with their duties, the Board of Administrators and the Bank's Management Committee develop the Internal Control System, by creating an organizational structure that is appropriate to the Bank's purpose and complexity, by clearly defining responsibilities, reporting lines, delegation of responsibilities and policies setting.

5. OBJECTIVES AND POLICIES OF THE BANK REGARDING RISK MANAGEMENT

The Bank acknowledges the need for good management and control of risks, for which the Risk Management Department was established in order to adequately identify, evaluate, measure, monitor, manage and report the risks involved in all its activities. The main responsibilities of Risk Management Department are:

- Development and review of the risk management strategy related to the management of significant risks;
- Analysis of transactions with affiliated parties, in order to identify and adequately assess the current and potential risks that they may cause to the Bank;
- Identification of risks generated by the complexity of the legal structure of the Bank;
- Assessment of significant changes;
- Measurement and internal risk assessment;
- Assuring that all identified risks can be effectively monitored by the operational units, periodical monitoring of actual risk profile of the bank and assessment in relation with the strategic objectives and risk tolerance/appetite of the bank;
- Independent analysis of any breach or non-compliance with the strategies, the risk tolerance/appetite, or risk related limits.

5.1 Risk Strategy of Vista Bank Romania SA

In order to determine significant risks, the Bank performs a comprehensive internal evaluation of the risks, as part of the Internal Capital Adequacy Assessment Process. During this process, all significant risks of the Bank were identified, together with relevant management activities.

Based on the above assessment, the following risks are considered to be significant: credit risk, residual risk, concentration risk, risk arising from currency lending to unhedged borrowers, market risk (foreign exchange risk), interest rate risk from non-trading activities, liquidity risk, operational risk (including model risk), legal risk and reputational risk, compliance risk, information and communication technology (ICT) and security risk, strategic and business risks, risk associated with outsourced functions, excessive leverage risk, , settlement risk.

5.2 Policies regarding the risk management for each risk category

The policy regarding the management of significant risks regulates the general frame for the management of significant risks within the Bank, according to the provisions of the EGO no. 99/2006 and its further amendments, the regulations issued by the European Parliament and Council, the NBR Norms and Regulations and the Internal Regulations of the Bank.



5.2.1 Credit Risk

Regarding the Credit Risk management, from the perspective of identifying, assessing and monitoring the process, the Bank applied starting with 01.01.2008, the standardized approach and seeks after the improvement and the amendment of the internal procedures and policies with reference to the credit activity, based on the Regulation (EU) no 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, the Norms and Regulations of the National Bank of Romania, especially those of Regulation no. 5/2013 regarding prudential requirements for credit institutions and its further amendments and other NBR Regulations regarding the credit risk for the credit institutions.

Credit risk management has as object the limitation of losses caused by the depreciation of debtor's situation. A permanent information to the management regarding the result of the process of the loan portfolio and off-balance sheet exposures quality analysis is needed, in order to detect and correct those with potential problems in due time.

The analysis of the loan portfolio and off-balance sheet exposures is a permanent process which includes two stages: the first stage is for the prevention of the risk generating events and takes place before taking the decision of financing potential clients, being followed by the credit risk monitoring stage which takes place after the loan financing and until the full repayment.

One of the methods used by the bank in order to diminish credit risk is loan portfolio diversification and avoidance of excessive risk exposure, by limiting the concentrations on activity sector of the debtor, duration of facility, type of facility, residence of the debtor, company size and type, geographic area, type of product, financial performance of the debtor, the real beneficiary of the debtor for legal entities and the concentrations on the type of product, the geographical area and customer residence for private individuals/PFA/PL and on the loans currency and collateral type for the entire debtors' portfolio.

The Bank monitors the exposures towards a client or group of connected clients and exposures towards affiliated persons.

The Bank also monitors the exposures to issuers of letters of guarantee collaterals (credit institutions). The Bank monitors the volume of restructured exposures.

Another method of risk mitigation is the booking of Expected Credit Losses (ECL) in order to cover potential losses and to ensure a reserve for banking risks. ECL is booked in order to cover possible exposures, which, after analysing the financial performance of the debtors and the indebtedness degree, present uncertainty related to their repayment.

The Bank uses also as a method of mitigating the credit risk partially or totally transferring the risk towards the client through partially financing the acquisition, partially financing the project, insurance policies for buildings and construction site in case of a construction project, assignment of debtor's income and/or constitution of collateral deposits for partially or totally covering the debtor's payment obligations or towards the collateral issuers through letters of guarantee and/or collateral deposits.

5.2.2 Market Risk

Regarding the Market Risk management, from the perspective of identifying, assessing and monitoring the process, the Bank applied starting with 01.01.2008 the standardized approach.



The market risk management includes position monitoring and limit control, identification, measurement and monitoring of market risks, i.e., FX risk, interest rate risk, etc., including country and counterparty risk, analysis and monitoring of market conditions relating to the above risks.

The Bank prevents the appearance of the market risk by:

- Minimizing the systematic risk component from market risk by maintaining a hedged position on maturities and currencies, and increasing of portfolio quality;
- Minimizing the unsystematic risk component from market risk by expanding the clients' portfolio.

The Bank uses as techniques for mitigating of the market risk the following:

- continuous monitoring of the FX position and the relevant movements of the currency market;
- setting up open position limits for both intraday and overnight purposes;
- ensuring compliance with the established limits, i.e., individual exposure limit from FX operations;
- monitoring maturity limits, total borrowing limit;
- periodical re-evaluation of the trading limits;
- Respecting the procedure for positions reconciliation of the accounts involved in the FX position (NOSTRO, internal accounts).

For limiting and mitigating the market risk, the Bank establishes, according to the market environment and the Bank's risk appetite, limits for FX exposure per currency.

The currency risk management is performed in a specific framework, which includes:

- The transactions' performing and the risk management in the Treasury and Capital Markets Department;
- The processing and the control of the transactions in the Treasury Back-Office Unit;
- The analysis, the monitoring and the risk control of the transactions in the Risk Management Department;

Currency risk management is typically performed via foreign currency position management.

The objective of the interest rate risk management is to increase the Bank's profit with the condition to maintain interest rate risk exposure within authorized limits.

The method used for managing interest rate risk are based on IRRBB analysis according to the EBA methodology. For the purpose of IRRBB analysis, according to the standardized methodology, all interest rate sensitive positions outside the trading book are included in the assessment for each currency in which the Bank holds a significant position.

5.2.3 Liquidity Risk

As part of the Bank's Liquidity management strategies, the Bank aims to:

- Maintain a diversified and stable funding base;
- Establish strong and lasting relationships with depositors;
- Avoid the excessive reliance on any one counterparty or any one product or funding market;
- Maintain a government securities portfolio to be used in case of liquidity needs to access Lombard facility with NBR, to access the NBR Repo facility, to sell in the market, or use them into repurchase agreement with current banking counterparties.;
- Obtaining a stand-by liquidity agreement to access it in case of liquidity problems;
- Perform currency swaps operations to cover specific liquidity needs on certain currencies;
- Have the knowledge over the accrued amount on interest rate sensitive assets and over the roll-covered



deposits;

- Know the applicable market haircuts to liquidate the assets positions under stressed conditions.

Assets and Liabilities Committee has the responsibility to monitor the liquidity of the bank and its evolution on each category of assets and liabilities.

The Treasury and Capital Markets Department has the responsibility to monitor and to assure the day-to-day liquidity of the bank's operations.

In considering liquidity risk, in addition to the contingency measures in case of liquidity crisis, the level of the stable deposit base was monitored.

For monitoring the impact of the liquidity risk, the bank employs the following methodologies:

- monitors the Liquidity Gap Report;
- monitors regulatory and internal liquidity indicators;
- monitors the Large Providers of Funds.

A set of early warning indicators is calculated and monitored daily.

The bank's objective regarding the liquidity risk is to maintain an adequate liquidity level if the necessary resources are ensured to support the budget objectives. For the purpose of maintaining adequate liquidity levels, the bank aims to maintain the LCR ratio at a level above 110%.

The Bank monitors the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR).

A minimum imposed level of 100% for LCR was imposed for each significant currency and for total.

The levels registered by the Bank as of 31st of December 2025 were as follows:

- LCR: 189.34%
- NSFR: 157.66%

Are presented below the data related to LCR in accordance with EBA Guide EBA/GL/2017/01:



Template EU LIQ1 - Quantitative information of LCR

EU 1a	Quarter ending on (DD Month YYYY)	Total unweighted value (average)				Total weighted value (average)			
		31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2025	30.09.2025	30.06.2025	31.03.2025
EU 1b	Number of data points used in the calculation of averages								
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA), after application of haircuts in line with Article 9 of regulation (EU) 2015/61					2,227,341,944	2,237,845,216	2,296,828,957	2,389,317,411
CASH - OUTFLOWS									
2	retail deposits and deposits from small business customers, of which:	3,715,849,735	3,612,167,191	3,562,521,405	3,530,216,299	415,286,220	407,291,594	398,395,455	387,364,677
3	Stable deposits	1,175,832,539	1,139,060,172	1,134,427,704	1,137,650,534	58,791,627	56,953,009	56,721,385	56,882,527
4	Less stable deposits	2,456,043,228	2,397,617,727	2,362,588,926	2,324,801,878	356,494,593	1,032,688,904	341,674,070	330,482,151
5	Unsecured wholesale funding	4,609,690,782	4,212,189,898	3,768,162,338	3,716,010,977	2,375,503,285	2,175,521,341	1,848,149,212	1,809,034,437
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-	-	-	-	-
7	Non-operational deposits (all counterparties)	4,609,690,782	4,212,189,898	3,768,162,338	3,716,010,977	2,375,503,285	2,175,521,341	1,848,149,212	2,454,864,294
8	Unsecured debt	-	-	-	-	-	-	-	-
9	Secured wholesale funding	-	-	-	-	-	-	-	-
10	Additional requirements	417,656,101	303,585,617	330,158,900	314,195,878	174,661,699	56,041,071	119,254,143	153,801,074
11	Outflows related to derivative exposures and other collateral requirements	152,759,167	33,814,667	100,385,000	140,688,333	152,759,167	33,814,667	100,385,000	140,688,333
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	264,896,934	269,770,951	229,773,900	173,507,545	21,902,533	22,226,405	18,869,143	13,112,741
14	Other contractual funding obligations	74,140,751	90,989,890	84,429,085	68,415,400	73,932,835	90,782,580	84,223,281	68,212,165
15	Other contingent funding obligations	1,018,998,618	969,557,095	930,145,927	895,886,583	110,318,839	98,188,285	84,097,332	91,768,643
16	TOTAL CASH OUTFLOWS					3,149,702,878	2,827,824,871	2,567,878,756	2,510,180,997
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	1,512,239,079	1,482,329,451	853,257,262	821,379,021	1,470,133,665	1,439,720,112	825,119,206	794,961,636
19	Other cash inflows	257,629,344	61,391,432	123,066,850	196,970,945	257,629,344	61,391,432	123,066,850	196,970,945
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	TOTAL CASH INFLOWS	1,769,868,423	1,543,720,883	976,324,112	1,018,349,966	1,763,041,141	1,501,111,544	1,022,983,872	991,932,581
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	1,769,868,423	1,543,720,883	976,324,112	1,018,349,966	1,763,041,141	1,501,111,544	1,022,983,872	991,932,581
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					2,227,341,944	2,237,845,216	2,296,828,957	2,389,317,411
22	TOTAL NET CASH OUTFLOWS					1,386,661,737	1,326,713,327	1,544,894,884	1,518,248,416
23	LIQUIDITY COVERAGE RATIO					162.63%	170.11%	149.67%	157.82%

Template EU LIQ2: Net Stable Funding Ratio



(in currency amount)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	907,989,990	-	-	109,169,519	1,017,159,509
2	<i>Own funds</i>	907,989,990	-	-	109,169,519	1,017,159,509
3	<i>Other capital instruments</i>	-	-	-	-	-
4	Retail deposits	-	2,238,462,740	1,352,362,231	160,203,696	3,450,435,316
5	<i>Stable deposits</i>	-	735,242,783	434,540,135	34,733,064	1,146,026,836
6	<i>Less stable deposits</i>	-	1,503,219,957	917,822,096	125,470,632	2,304,408,480
7	Wholesale funding:	-	4,229,774,222	255,855,172	255,855,172	2,286,201,034
8	<i>Operational deposits</i>	-	-	-	-	-
9	<i>Other wholesale funding</i>	-	4,229,774,222	1,049,734,902	255,855,172	2,286,201,034
10	Interdependent liabilities	-	-	-	-	-
11	Other liabilities:	-	73,793,302	7,246,219	57,285,773	60,908,883
12	<i>NSFR derivative liabilities</i>	-	-	-	-	-
13	<i>All other liabilities and capital instruments not included in the above categories</i>	-	73,793,302	7,246,219	57,285,773	60,908,883
14	Total available stable funding (ASF)					6,814,704,741
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					-
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		1,695,321,974	849,786,551	3,619,880,908	4,035,587,127
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		-	-	-	-
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		752,667,990	27,407,297	43,811,641	132,782,088
20	<i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		860,310,780	761,540,828	2,801,741,806	3,902,805,039
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		147,784	277,872	4,314,869	68,591,278
22	<i>Performing residential mortgages, of which:</i>		82,343,204	60,838,426	774,327,461	-
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		5,537,567	5,311,361	92,537,417	-
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		-	-	-	-
25	Interdependent assets		-	-	-	-
26	Other assets:		2,861,861,105	3,728,669	31,211,511	275,581,010
27	<i>Physical traded commodities</i>		-	-	-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	-	-
29	<i>NSFR derivative assets</i>		13,150,235	-	-	13,150,235
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		915,061,400	-	-	45,753,070
31	<i>All other assets not included in the above categories</i>		1,933,649,470	3,728,669	31,211,511	216,677,705
32	Off-balance sheet items		35,256,640	52,485,219	137,773,210	11,299,566
33	Total RSF					4,322,467,703
34	Net Stable Funding Ratio (%)					157.66%



5.2.4 Operational Risk

Regarding the Operational Risk management, from the perspective of identifying, assessing and monitoring the process, the Bank applied, starting with 01.01.2025, the approach based on the calculation of the Business Indicator, in line with the requirements of Regulation (EU) No 575/2013 of the European Parliament and Council from 26 June 2013 on prudential requirements for credit institutions and investment companies, and the additional amendments

Internal regulations regarding operational risk are intended to establish this risk management framework within the Bank to meet legislative requirements in force.

The Bank's operational risk management is based on a quantitative and qualitative approach offering a more comprehensive perception of risks arising from activities undertaken within each process.

The main objective of operational risk management refers to:

- Defining and implementing specific policies and procedures;
- Obtaining bank-wide transparency regarding risk management arising from improper operation or implementation of processes, systems or due to human errors, external events or legal uncertainties, and to obtain information about possible losses associated therewith;
- Defining and implementing stress test scenarios for operational risk;
- Optimization of operational risk management, permanent following of risk / return approaches;
- Strengthen and increase efficiency identification and assessment method of operational risks, to mitigate these risks and improve the Bank's risk profile;
- Prevention of events and minimizing losses through effective monitoring and control in the permanent monitoring;
- Raising awareness and incorporation of operational risk management processes daily;
- Increasing the quality of services offered to clients;
- Reducing capital requirement for operational risk in the context of improving operational efficiency and customer service quality;
- Increased credibility in relationships with customers, rating agencies, shareholders and regulators.

In order to achieve the targets, set for the effective management of operational risk, the Bank established according to the methodology based on identifying, measuring, reporting/ monitoring and risk management, the following methods:

- Risk identification through training sessions conducted to raise awareness of the effects of operational risk through self-assessment and risk control measures (RCSA) and identifying, recording and reporting operational risk events;
- Reporting/ monitoring risks through early warning system based on key indicators for measuring risks;
- Risk management by:
 - Avoiding risk - by failure to engage in significant risk-bearing activities or difficult to monitor and predicting future events that may cause the loss and the prevention of loss events - e.g., interruption of risky activities;
 - Mitigating risk by preventing or specific impact of a particular event; ex. intensifying the control actions, restructuring processes, replacing IT systems, contingency management;
 - Transfer risk to third parties through insurance policies and outsourcing contracts;
 - Acceptance of risk;



- The process of escalation and continuation of the activity/ crisis management.

Template EU OR2 - Business Indicator, components and subcomponents

BI and its subcomponents		2025	2024	2023	Average value
1	Interest, lease and dividend component (ILDC)				215,171,266.00
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))				215,171,266.00
1a	Interest and lease income	591,367,196.00	601,945,453.00	571,956,227.00	588,422,958.67
1b	Interest and lease expense	339,251,268.00	366,267,112.00	375,332,921.00	360,283,767.00
1c	Total assets/Asset component	10,380,699,936.00	8,721,256,019.00	9,400,683,702.00	9,500,879,885.67
1d	Dividend income/dividend component	1,764,287.00	1,365,300.00	1,074,820.00	1,401,469.00
2	Services component (SC)				46,683,736.00
2a	Fee and commission income	26,533,958.00	20,081,350.00	15,929,081.00	20,848,129.67
2b	Fee and commission expense	4,162,013.00	3,795,574.00	2,945,673.00	3,634,420.00
2c	Other operating income	38,615,193.00	26,302,605.00	12,589,023.00	25,835,607.00
2d	Other operating expense	5,229,998.00	22,059,522.00	15,141,918.00	14,143,812.67
3	Financial component (FC)				28,101,196.00
3a	Net profit or loss applicable to trading book (TB)	19,163,677.00	8,057,930.00	4,594,703.00	10,605,436.67
3b	Net profit or loss applicable to banking book (BB)	21,604,548.00	15,160,278.00	15,722,453.00	17,495,759.67
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)				-
4	Business Indicator (BI)				289,956,198.00
5	Business indicator component (BIC)				34,794,743.76

Disclosure on the BI:

		a
6a	BI gross of excluded divested activities	289,956,198.00
6b	Reduction in BI due to excluded divested activities	-
EU 6c	Impact in BI of mergers/acquisitions	-

Template EU OR3 - Operational risk own funds requirements and risk exposure amounts

		a
1	Business Indicator Component (BIC)	34,794,743.76
EU1	Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	-
2	Not applicable	
3	Minimum Required Operational Risk Own Funds Requirements (OROF)	34,794,743.76
4	Operational Risk Exposure Amounts (REA)	434,934,297.00

5.2.5 Business continuity management framework

Vista Bank Romania has prepared a Business Continuity Plan to be activated and followed in case of a major disaster / incident such as: natural disaster, terrorist attack, power outage, prolonged interruption or total failure of critical IT systems, as well as in pandemic case. Also, any contractual partner of Vista Bank Romania to which essential services have been outsourced have Business Continuity Plans prepared to be activated in case of disaster. The Bank concluded with ICT services providers addendums that include specific requirements for compliance with EU Regulation No. 2022/2554 (“DORA”) on the digital operational resilience of the financial sector. Vista Bank has prepared a secondary operational site/building, where the Bank’s critical activities could continue, and starting with the 2020 pandemic, also especially dedicated IT and secure communication systems have been configured to facilitate the remote work of employees.



Vista Bank has also prepared a Disaster Recovery Plan for critical IT systems that support the bank's critical business processes. Critical IT systems can be recovered into a secondary Data Center if the IT systems from the primary Data Center become unavailable.

The Bank's critical processes are identified following a business impact analysis, which assesses the effect for the Bank on the impossibility of providing / providing services to customers, as well as from a legal, reputational or financial point of view. Values such as RTO (Recovery Time Objective - to be achieved as a goal so that critical activity can continue), or RPO (Recovery Point Objective – the maximum time objective that can pass from the last data backup to the time of disaster so that critical activity could continue).

Both Plans are updated annually (or more often if necessary, following the implementation of a new critical process or a new critical IT system within the Bank).

The Bank's management has appointed a Business Continuity Plan Coordinator (and a Replacement of the Coordinator), as well as a Disaster Recovery Plan Coordinator, who are responsible for ensuring that plans are up-to-date, acknowledged by employees and tested annually. The Bank's management, which also coordinates the Management Team for Business Continuity and Crisis Management, is authorized to officially declare a disaster and decide to activate the Business Continuity Plan (BCP) and / or the Disaster Recovery Plan (DRP).

The annual tests simulate various disaster scenarios, with the objective that the participants to the tests within the departments or territorial units that carry out critical activities to gain the necessary experience in order to react adequately and in time in case of a disaster. Also, the annual tests help to assess the operational or technical capabilities of disaster recovery and continuation, so that any identified deficiencies can be improved / remedied in time. The results of the annual tests of the business continuity plan and of the recovery of critical IT systems are presented to the Bank's Management and to the Business Continuity and Crisis Management Committee. Following the last business continuity and disaster recovery tests conducted by the Bank from a Secondary Operational building and using applications and servers recovered into a Disaster Recovery Data-Centre, a satisfactory level of compliance with the provisions of the Business Continuity Plan resulted, with no significant problems reported by the test participants.

5.3 Information on the structure and organization of the risk management function

The risk management function, part of the Bank's internal control system is exercised in the Risk Management Department, and has functional subordination reporting to the Deputy Chief Executive Officer – CRO, who is the Coordinator of Risk Management Function within the Bank for daily activities. It reports directly to the Board of Administration independently of reporting to the Bank's Management Committee Administrators.

During 2025 within the Risk Management Department have carried out its activity 10 employees, organized within the following units: Credit Risk Unit, Market Risk, Operational Risk and Permanent Control and Risk Modeling and Projects Unit, under the coordination of the Manager and the Deputy Manager.

Risk Management Department informs monthly Board of Administrators and the Management Committee, and on a quarterly basis or whenever necessary the Risk Management Committee, on the significant risks to which the Bank is exposed.



5.4 Information on the structure and organization of the ICT security risk management function

The ICT security risk management function is exercised at the level of the Information Security Unit and has functional subordination of reporting to the Deputy General Director - (CRO).

During 2025, a number of 2 employees worked within the Information Security Unit.

6. SIGNIFICANT INFORMATION REGARDING THE FINANCIAL AND OPERATIONAL RESULTS

Significant information on financial and operating results is presented in the individual annual financial statements prepared in accordance with International Financial Reporting Standards as adopted by the European Union. They are published on the Bank's website and contain the following main elements:

- Statement of financial position
- Profit and loss statement
- Cash flow statement
- Statement of changes in capital
- Notes to the financial statements

At the end of the year 2025, the level of key indicators recorded by the Bank is presented in the Annual Individual Financial Statements published on the Bank's website.

7. INFORMATION REGARDING THE OWN FUNDS

The components elements of the Total own funds as well as the main objectives of the Bank in this respect are mentioned in the note 3.7 from the annual individual Financial Statements, published on the bank's web-site.

The Own Funds of the Bank consist of Tier1 and Tier 2 items. The Tier 1 capital of an institution consists of the sum of the Common Equity Tier 1 capital and Additional Tier 1 capital of the bank.

Common Equity Tier 1 items of the bank consist of the following:

- share capital
- retained earnings;
- other reserves (legal, general banking risk, etc.);

Additional Tier 1 items of the bank consist of the following:

- issued bonds

Bank deducts from the Tier 1 items the following:

- carried losses
- intangible assets
- deferred tax assets
- insufficient coverage for non-performing exposures

The Bank has Tier 2 items in the form of subordinated debts.

Subject to the legislation in force, bank satisfied at all times, during 2025 the following own funds requirements:

- Common Equity Tier 1 capital ratio of 6.99%;
- Tier 1 capital ratio of 9.31%;
- Total capital ratio of 12.42%.

Bank shall calculate the capital ratios as follows:



- Common Equity Tier 1 capital ratio is the Common Equity Tier 1 capital of the institution expressed as a percentage of the total risk exposure amount;
- Tier 1 capital ratio is the Tier 1 capital of the institution expressed as a percentage of the total risk exposure amount;
- Total capital ratio is the own funds of the institution expressed as a percentage of the total risk exposure amount.

Total risk exposure amount shall be calculated as the sum of:

- the risk weighted exposure amounts for credit risk
- the own funds requirements, determined for foreign-exchange risk;
- the own funds requirements, determined for operational risk;
- own funds requirements, determined for credit valuation adjustment

Moreover, as of January 1st, 2016 the provisions of Order No. 12/2015 of the National Bank of Romania on the capital conservation buffer and the anti-cyclic capital buffer are applied so that credit institutions must meet the requirements of maintaining a capital buffer equal to a certain percentage of the total value of exposure to risk which in 2025 for the capital conservation buffer was 2.5% and for the anticyclical buffer was 1% since October 2023.

In this context, as outlined at article 355 of the Guidelines on Common Procedures and Methodologies for the Supervisory Review and Evaluation Process (SREP) of Credit Institutions issued by the European Banking Authority, the Overall Capital Requirement (OCR) consists of the TSCR requirement, the buffer requirements set out in the Capital Requirements Directive and the additional own funds requirements to cover macro-prudential risks.

Also, according to the provisions of Order no. 4/09.05.2018 of the National Bank of Romania, starting 30 June 2018, credit institutions must meet the requirements for maintaining a systemic risk capital buffer in accordance with the methodology set out in the annex to the Order mentioned above which was 1% during 2025.

Consequently, the overall capital requirement for Total Tier 1 equity (Tier 1 ORC) is composed of the TSCR requirement for the Tier 1 equity ratio and the capital buffer requirements (capital conservation buffer applicable in 2025 at a rate of 2.5% and systemic risk buffer of 1% and the anticyclical capital buffer of 1%).

Reconciliation of the Common Tier 1 and Supplementary Tier 1, as well as elements of Tier 2, deductions applicable in line with articles 32-35, 36, 56, 66 and 79, from Regulation UE 575/2013, of the Total Own Funds with the elements of the Financial Statements of the Bank is presented below:

Template EU CC1 - Composition of regulatory own funds



		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	504,907,982.00	e
	of which: Instrument type 1		
	of which: Instrument type 2		
	of which: Instrument type 3		
2	Retained earnings	185,643,163.00	i
3	Accumulated other comprehensive income (and other reserves)	34,392,925.00	f
EU-3a	Funds for general banking risk	7,568,064.00	f
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	73,422,233.00	h
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	805,934,367.00	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-	
8	Intangible assets (net of related tax liability) (negative amount)	(22,793,474.00)	b
9	Not applicable		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	(40,200.00)	a
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	
15	Defined-benefit pension fund assets (negative amount)	-	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	(329,432.00)	g
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
20	Not applicable		
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20c	of which: securitisation positions (negative amount)	-	
EU-20d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
24	Not applicable		
25	of which: deferred tax assets arising from temporary differences	-	
EU-25a	Losses for the current financial year (negative amount)	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
26	Not applicable		
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27a	Other regulatory adjustments	(2,243,771.00)	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(25,406,877.00)	
29	Common Equity Tier 1 (CET1) capital	780,527,490.00	



Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	127,462,500.00	d
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	127,462,500.00	
Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
41	Not applicable		
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42a	Other regulatory adjustments to AT1 capital	-	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	
44	Additional Tier 1 (AT1) capital	127,462,500.00	
45	Tier 1 capital (T1 = CET1 + AT1)	907,989,990.00	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	109,169,519.00	c
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	-	
EU-47a	Amount of qualifying items referred to in Article 494a (2) subject to phase out from T2	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	-	
51	Tier 2 (T2) capital before regulatory adjustments	109,169,519.00	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
54a	Not applicable		
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
56	Not applicable		
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
56b	Other regulatory adjustments to T2 capital	-	
57	Total regulatory adjustments to Tier 2 (T2) capital	-	
58	Tier 2 (T2) capital	109,169,519.00	
59	Total capital (TC = T1 + T2)	1,017,159,509.00	
60	Total risk exposure amount	5,167,602,001.18	



Capital ratios and requirements including buffers			
61	Common Equity Tier 1	15.10%	
62	Tier 1	17.57%	
63	Total capital	19.68%	
64	Institution CET1 overall capital requirements	11.35%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement	0.86%	
67	of which: systemic risk buffer requirement	1.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	2.49%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	10.60%	
69	Not applicable		
70	Not applicable		
71	Not applicable		
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	-	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	-	
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	-	
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	

Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements



		Balance sheet as in published financial statements	Reference
		As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements			
1	Cash and current accounts at National Bank of Romania	2,142,381,934.00	
2	Loans and advances to banks at amortised cost	800,210,088.00	
3	Loans and advances to clients at amortised cost	5,458,565,420.00	
4	Debt securities at amortised cost	1,763,599,597.00	
5	Financial assets at fair value through other comprehensive income	11,511,096.00	
6	Financial assets mandatorily at fair value through profit or loss	2,488,246.00	
7	Investments in subsidiaries	3,415,995.00	
8	Financial assets held for trading, out of which:	13,150,235.00	
9	Derivatives	13,150,235.00	
10	Debt securities	-	
11	Reposessed assets	22,109,084.00	
12	Other financial assets	20,964,728.00	
13	Other assets	15,768,809.00	
14	Investment property	86,773,002.00	
15	Current tax assets	146,272.00	
16	Deferred tax assets	40,200.00	a
17	Property, Plant and Equipment	45,966,064.00	
18	Right-to-use assets	57,070,971.00	
19	Intangible assets	22,793,474.00	b
xxx	Total assets	10,466,955,215.00	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements			
1	Deposits from banks	11,203,010.00	
2	Deposits from clients	9,267,943,279.00	
3	Loans from banks	-	
4	Derivatives	-	
5	Other financial liabilities	39,653,813.00	
6	Other liabilities	26,595,288.00	
7	Lease debt	61,737,953.00	
8	Subordinated loans	115,710,580.00	c
9	Debt securities issued	128,168,114.00	d
10	Other provisions	7,421,667.00	
11	Current tax liabilities	2,916,576.00	
12	Deferred tax liabilities	-	
xxx	Total liabilities	9,661,350,280.00	
Shareholders' Equity			
1	Capital	504,907,982.00	e
2	Reserves	41,960,988.00	f
3	Own shares	(329,432.00)	g
4	Profit	86,483,787.00	h
5	Retained earnings	172,581,610.00	i
xxx	Total shareholders' equity	805,604,935.00	



8. INFORMATION RELATED TO THE CAPITAL ADEQUACY

8.1. Capital requirements

The capital requirements are calculated using the approaches defined by the European Committee through specific regulations for credit risk, market risk and operational risk.

The Bank uses the standardized approach to determine the minimum capital requirements for credit risk. The calculation of capital requirements is conducted in accordance with Regulation 575 / 2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with subsequent modifications and NBR Regulation No. 5 / 12.20.2013 on prudential requirements for credit institutions with subsequent modifications.

The Bank determines minimum capital requirements, where applicable, for the trading, counterparty and currency risk in accordance with Regulation 575 / 2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with subsequent modifications.

In order to determine the minimum capital requirement for operational risk, the Bank adopted the basic indicator approach. The calculation of capital requirements is conducted under the provisions of Regulation 575 / 2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with subsequent modifications.

The table below shows the total risk weighted assets of Vista Bank (Romania) SA as of 31.12.2025:



Template EU OV1 – Overview of total risk exposure amounts

		Total risk exposure amounts (TREA)		Total own funds requirement
		a	b	c
		2025	2024	T
1	Credit risk (excluding CCR)	4,653,509,027.68	4,016,600,916.60	372,280,722.21
2	Of which the standardised approach	4,653,509,027.68	4,016,600,916.60	372,280,722.21
3	Of which the Foundation IRB (F-IRB) approach	-	-	-
4	Of which slotting approach	-	-	-
EU 4a	Of which equities under the simple risk weighted approach	-	-	-
5	Of which the Advanced IRB (A-IRB) approach	-	-	-
6	Counterparty credit risk - CCR	61,696,014.00	28,209,799.00	4,935,681.12
7	Of which the standardised approach	-	-	-
8	Of which internal model method (IMM)	-	-	-
EU 8a	Of which exposures to a CCP	-	-	-
9	Of which other CCR	61,696,014.00	28,209,799.00	4,935,681.12
10	Credit valuation adjustments risk - CVA risk	17,462,662.50	638,768.00	1,397,013.00
EU 10a	Of which the standardised approach (SA)	-	-	-
EU 10b	Of which the basic approach (F-BA and R-BA)	17,462,662.50	638,768.00	1,397,013.00
EU 10c	Of which the simplified approach	-	-	-
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	-	-	-
EU 19a	Of which 1250% / deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	-	-	-
21	Of which the Alternative standardised approach (A-SA)	-	-	-
EU 21a	Of which the Simplified standardised approach (S-SA)	-	-	-
22	Of which the Alternative Internal Models Approach (A-IMA)	-	-	-
EU 22a	Large exposures	-	-	-
23	Reclassifications between trading and non-trading books	-	-	-
24	Operational risk	434,934,297.00	467,861,221.25	34,794,743.76
EU 24a	Exposures to crypto-assets	-	-	-
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-
26	Output floor applied (%)	-	-	
27	Floor adjustment (before application of transitional cap)	-	-	
28	Floor adjustment (after application of transitional cap)	-	-	
29	Total	5,167,602,001.18	4,513,310,704.85	413,408,160.09

Countercyclical capital buffer of the credit institution's specific capital

The countercyclical capital buffer is a macro-prudential tool for preventing and limiting excessive credit growth and indebtedness to the nongovernmental sector.



Credit institutions shall maintain a specific countercyclical buffer, equivalent to the institution's total exposure amount, multiplied by the weighted average of the rates of the countercyclical damping. This buffer shall consist of own basic Tier 1 holdings in addition to the requirements imposed by Regulation (EU) No. 575/2013.

The rate of the countercyclical buffer of the credit institution shall be equal to the weighted average of the rates of the countercyclical buffer applied in the jurisdictions in which the relevant credit exposure of the credit institution is located.

For the purpose of calculating the weighted average, credit institutions shall apply to each rate of buffer applicable in a jurisdiction the ratio obtained by reporting its total own funds requirements for credit risk corresponding to exposures located in that jurisdiction to total own funds requirements for the credit risk related to all its relevant credit exposures.

Starting October 2023, the rate of the countercyclical buffer imposed by the National Bank of Romania for exposures located in Romania was 1%.

Template EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements			Total	Risk expos
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non trading book		
010	Breakdown by country:											
	Belgium	15,854,912	-	-	-	-	15,854,912	257,022	-	-	257,022	
	Romania	11,123,880,334	-	-	-	-	11,123,880,334	315,071,733	-	-	315,071,733	
	Cyprus	114,462	-	-	-	-	114,462	9,157	-	-	9,157	
	Denmark	262,092	-	-	-	-	262,092	20,967	-	-	20,967	
	France	11,066,245	-	-	-	-	11,066,245	265,304	-	-	265,304	
	Greece	749,332,073	-	-	-	-	749,332,073	33,746,971	-	-	33,746,971	
	Spain	55,500	-	-	-	-	55,500	4,440	-	-	4,440	
	Italy	124,525	-	-	-	-	124,525	9,962	-	-	9,962	
	Switzerland	5,752,018	-	-	-	-	5,752,018	122,955	-	-	122,955	
	Malta	35,217,096	-	-	-	-	35,217,096	2,817,368	-	-	2,817,368	
	United Kingdom	1,292,418	-	-	-	-	1,292,418	103,393	-	-	103,393	
	Saint Kitts and Nevis	11,304,450	-	-	-	-	11,304,450	904,356	-	-	904,356	
	Israel	126,458	-	-	-	-	126,458	10,117	-	-	10,117	
	Liberia	83,100,441	-	-	-	-	83,100,441	6,648,035	-	-	6,648,035	
	Jersey	10,196,999	-	-	-	-	10,196,999	815,760	-	-	815,760	
	Marshall Islands	197,165,203	-	-	-	-	197,165,203	15,773,216	-	-	15,773,216	
	Netherlands	21,778	-	-	-	-	21,778	1,742	-	-	1,742	
	United Arab Emirates	184,796	-	-	-	-	184,796	14,784	-	-	14,784	
	United States	14,530,781	-	-	-	-	14,530,781	232,486	-	-	232,486	
	Canada	381,458	-	-	-	-	381,458	30,517	-	-	30,517	
	Portugal	19,835,883	-	-	-	-	19,835,883	317,367	-	-	317,367	
	Ireland	61,706,461	-	-	-	-	61,706,461	836	-	-	836	
	Austria	323,450	-	-	-	-	323,450	25,876	-	-	25,876	
	Germany	150,486	-	-	-	-	150,486	12,039	-	-	12,039	
020	Total	12,341,980,321	-	-	-	-	12,341,980,321	377,216,403	-	-	377,216,403	

Template EU CCyB2 - Amount of institution-specific countercyclical capital buffer

1	Total risk exposure amount	5,167,602,001
2	Institution specific countercyclical capital buffer rate	0.860%
3	Institution specific countercyclical capital buffer requirement	44,428,917

8.2 Internal Capital Adequacy Assessment Process (“ICAAP”)

According to Basel III Capital Adequacy Framework, Pillar I sets the ways of measuring risks, especially



credit, market and operational risks and aims to the alignment of the capital requirements with the risks undertaken.

The above rules are completed by Pillar II, which sets the requirements for monitoring, assessing and controlling all material risks to which credit institutions are exposed. Those requirements are associated with the Internal Capital Adequacy Assessment Process (ICAAP) applied by credit institutions.

The Bank recognizes the importance of an effective Internal Capital Adequacy Assessment Process (ICAAP). The development and implementation of ICAAP aims at ensuring the adequacy of the credit institutions' own funds for covering the various types of material risks which they are exposed to, as a result of their business activities.

The ICAAP objectives are:

- the proper identification, measurement, control and overall assessment of all material risks;
- the development of the appropriate systems for the measurement and management of those risks;
- the internal evaluation of the capital required for the mitigation of risks (“internal capital”).

In this respect, the bank has developed an internal regulatory framework respectively the Policy regarding the Internal Capital Adequacy Assessment Process (ICAAP).

The bank performed the ICAAP exercise for the year 2025 by estimating the relevant internal capital for all major risk types. The ICAAP contains the following:

- Risk profile assessment
- Risk measurement and internal capital adequacy assessment
- Stress testing development, analysis and evaluation
- ICAAP reporting framework
- ICAAP documentation

The Bank has recognized and analysed under the ICAAP the following risks to which it is exposed, including also the regulatory risks (for which the capital requirement may be adjusted/differently approached): credit risk including the concentration risk on debtor/group of debtors learn and on activity sector, residual risk and foreign currency risk related to borrowers exposed to currency risk, operational risk, market risk - currency risk, liquidity risk, interest rate risk in the banking book, strategic and business risk, reputational risk, compliance risk and other uncontrollable risks.

Internal capital requirements are computed per each risk type, then summed up for all the risks and compared with the assessed internal capital. Calculations were based on the methodologies that have already been developed in the ICAAP Framework. Results showed that the bank has sufficient capital to cover the material risks that it is exposed to in its business activities, registering a level of the total capital adequacy ratio of 15,14% and a Tier 1 capital ratio of 13,52 %, The total capital adequacy ratio registered a marginal level slightly below the compared with the tolerance level as established through the ICAAP Policy, while the Tier 1 capital ratio registered both a level above the tolerance level as established through the ICAAP Policy.

8.3 Stress testing Policy

The Bank performs stress testing for the following significant risk categories:

- Credit risk (including credit concentration risk);
- Market risk (foreign exchange and interest rate risk);
- Liquidity risk;
- Operational risk;



- Reputational risk.

Stress testing complements other risk management tools used by the Bank, its main role being to assist the management body in assessing their view of risks, identifying risk concentrations or taking/planning mitigating actions.

The objectives of the stress testing process as an integrated process of the risk management framework are as follows:

- Assess the possible financial impact of extreme but plausible events in relation to the Bank's risk appetite;
- Identify underlying causes of potential extreme events (control failures etc.);
- Check the reasonableness of the Bank's risk (internal) capital calculations;
- Identify main risk drivers and inter-dependences between risk drivers and the business cycle;
- Forward looking tool for the ICAAP/ ILAAP, capital planning process and recovery plan;
- Setting/ assessment of the appropriateness of the system of risk limits used / risk profile;
- Develop/ enhance contingency capital and funding plans;
- Take pre-emptive action to protect the Bank.

The measures that the management body could implement when considering the Bank's risk exposure compared to the risk appetite/ risk tolerance or business strategy or objectives in the context of the stress testing process are:

- Reviewing the set of limits, especially for the risks which are subject to regulatory limits;
- Implementation/ enhancement of risk mitigation techniques;
- Reducing exposures or business in specific sectors, countries, regions or portfolios;
- Reconsidering the funding policy;
- Reviewing capital adequacy;
- Implementing contingency plans.

Regarding **credit risk**, for the stress testing exercise, the current IFRS 9 impairment methodology for estimation of probability of default was used in order to obtain stressed values. The PD curve is obtained by forecasting the shift between the TTC and PIT matrices, driven by the current economic position and forecasted macroeconomic variables. The EBA adverse inflation and unemployment rates stress scenarios were used for Romania in order to build stressed PD curves.

For the LGD parameter, the collateral values for RRE and CRE were adjusted using the EBA published stressed scenarios available for Romania for these asset classes.

In the scenario related to accelerated deterioration of debtors' payment behavior, the main indicators taken into account were the rate of non-performing loans and the coverage with provisions, their variations having a direct impact on profitability and capital adequacy. In this sense, an increase by 4 times of the non-performing rate increase was evaluated.

Additionally, two more stress test scenarios were used, namely the default of some debtors / groups of debtors and the deterioration of the situation / significant increase of the credit risk for certain categories of non-resident debtors.

In developing **operational risk** stress test scenarios, were considered the following categories of events:

- Business disruption of a territorial unit due to extreme weather conditions (fire, power outage)
- Damage or destruction of Head Office following an earthquake



- Payment's system interruptions (due to technical issues which affect the communication line between the Bank and Transfond)
- Internal fraud events (Maximum amount of cash available in the vault, stolen by a Bank employee);
- Loss of an important amount of money in a short period of time due to litigations with customers
- Business disruption of the territorial units from different geographical areas following a crisis due to a pandemic.

For **reputational risk**, the following crisis scenarios were carried out:

- Major cybercrime incident (compromising data of 10,000 individual customers following an IT breach)
- The sectorial crisis of confidence in the banking system (the bankruptcy of a credit institution in the market generates media panic and distrust at the depositors' level)

For the **foreign exchange risk** stress testing exercise, the Bank analyses the effects of foreign exchange rates fluctuations and open currency position increase, in the form of potential loss and supplementary capital requirements for the corresponding open currency position, with final impact on solvability.

In order to conduct stress tests for the **interest rate risk in the banking book**, the Bank analyses the effects of interest rates changes using scenarios based on standard regulatory methodology (changing of economic value) and scenarios-based earnings perspective. The bank performs stress testing according to the EBA Guidelines on the management of interest rate risk arising from non-trading activities (Commission Delegated Regulation (EU) 2024/857). For the purpose of the **liquidity risk** stress testing exercise, the Bank uses the underlying scenario and assumptions that are embedded in the Liquidity Coverage Requirement (LCR) as per the EU Capital Requirements Regulation (CRR). As per the regulatory proposals (Basel 3 text), the underlying scenario for the LCR entails a combined idiosyncratic (institution specific) and market-wide shock, complementary to the existing supervisory requirements, the survival period is used which assumes survival for a period of at least 30 days in the event of a severe crisis scenario, without access to funding markets for a period of at least 12 months.

Also, the Bank assesses the potential impact of the stress tests scenarios performed during the annual business plan process on the level of the leverage indicator.

9. COUNTERPARTY CREDIT RISK EXPOSURE

In order to have an efficient management of counterparty credit risk, the Bank has established a set of counterparty limits. The list of counterparty limits is maintained and updated at Risk Management Department level. In order to implement the new counterparty limits or increase existing limits, the approval of the Board of Administrators is required. Limits monitoring is performed by Risk Management Department which reports to bank management.

Counterparty limits are established based on an analysis that also includes counterparty credit rating of financial institutions. Ratings are provided by external rating agencies, namely Moody's known, Standard & Poor's and Fitch. The set of limits is reviewed in accordance with the bank workload and financial market conditions.

At the end of 2025 the Bank held derivatives financial instruments at fair value amounting to RON



13.150.235 while the contractual value in RON equivalent was RON 915.061.400.

10. ADJUSTMENTS FOR CREDIT RISK (EXPECTED CREDIT LOSSES)

10.1 Definitions and general information

Exposures to non-financial customers are classified into four (4) stages, taking into account the criteria below:

	Exposures	Individually/Collectively assessed
1	Stage 1	If, at the reporting date, the credit risk on the financial instrument has not increased significantly since initial recognition
2	Stage 2	<p>If, at the reporting date, the credit risk on the financial instrument has increased significantly since initial recognition. The indicators representing significant increase in credit risk are:</p> <p>Quantitative indicators:</p> <ul style="list-style-type: none"> • Days past due - more than 30 days past due since origination compared with the reporting date; • Increase in the probability of default (PD) from the date of reporting compared to the moment of origination. The quantitative analysis is based on the comparison of the PD from the reporting date for the entire lifetime with the PD from the origination date (for the entire lifetime), the parameters being adjusted so that both values are comparable.; <p>Qualitative indicator:</p> <ul style="list-style-type: none"> • Forborne exposures • The debtor is on the monitoring list of debtors under observation ("watch list"); • Deterioration of the prospects for the sector or industry in which the debtor operates; • Deterioration of the future cash flows without affecting the ability to pay for the immediate period (without the need for restructuring as immediate measure); • The decision of the Bank's management to intensify the monitoring of a debtor or a group of debtors; • Increase of the interest margin as a measure of increasing the credit risk associated with the debtor.
3	Stage 3	Defaulted exposures
4	POCI	Depreciated financial assets at the origination/aquisition date

For Stage 3 allocation, Guidelines on the application of the definition of default under Article 178 of Regulation (EU) No 575/2013 (EBA/GL/2016/07) are considered.

The Bank applies the default definition at debtor's level, both for non-retail customers and for retail customers. The same definition of default is used for all types of exposures.

Defaulted exposures are the ones which meet at least one of the following criteria:

a) Past due criterion in the identification of default



b) Indications of unlikeliness to pay.

Past due criterion in the identification of default considers:

- i) Past due loan obligation and materiality threshold;
- ii) Counting of days past due;
- iii) Suspending the counting of days past due;
- iv) Technical past due situation.

Regarding past due criterion, starting 31.12.2020, and the Bank takes into consideration the following materiality thresholds set by the NBR for the past due loan obligations:

- For retail exposures:
 - a) the level for the relative component of the materiality threshold is 1%;
 - b) the level for the absolute component of the materiality threshold is 150 lei;
- For exposures other than retail:
 - a) the level for the relative component of the materiality threshold is 1%;
 - b) the level for the absolute component of the materiality threshold is 1.000 lei.

The Bank considers that the obligor is defaulted when both the limit expressed as the absolute component of the materiality threshold and the limit expressed as the relative component of that threshold are exceeded for more than 90 consecutive days. When the criterion of the materiality threshold is no longer met, the debtor remains under monitoring for a period of 3 months (90 days). If during the monitoring period the materiality thresholds are not breached for more than 30 consecutive days, after the expiration of this period the debtor will exit the default/ non-performing status. If during the monitoring period the materiality thresholds are breached for more than 30 consecutive days, the monitoring period is reset and the debtor remains under monitoring for a new period of 3 months (90 days). If the breach is maintained for a period over 90 consecutive days, the debtor remains in default/nonperforming status.

The debtor is considered to be in default when at least one of the following indications of unlikeliness to pay is identified:

- a) Non-accrued status;
- b) Specific credit risk adjustments (expected credit losses stage 3);
- c) Sale of the credit obligation;
- d) Restructuring;
- e) Bankruptcy or other similar protection;
- f) Confirmed fraud or suspicion of fraud;
- g) other indications of unlikeliness to pay:
 - i) Clients under forced execution procedure;
- ii) Clients having at least one exposure non-performing restructured;
 - iii) Clients which sent to the Bank debt resolution request.
 - iv) Clients for which the Bank identified on the basis of internal information the unlikeliness to pay that could be considered by include the following:
 - a borrower's sources of recurring income are no longer available to meet the payments of instalments;
 - there are justified concerns about a borrower's future ability to generate stable and sufficient cash flows;
 - the overall level of leverage of the borrower has increased significantly or such changes in leverage are reasonably expected;
 - the debtor breached the terms of a loan agreement with the Bank;
 - the bank has requested any guarantee instrument, including a collateral;



- for exposures to a private individual: the default of a company wholly owned by a single individual, where the latter has provided the Bank with a personal guarantee for all of the company's obligations.

v) Clients for whom the Bank has identified from external sources negative information regarding the ability to pay, such as:

- significant delays in payments to other creditors were recorded in the Central Credit Register (CRC).

- a crisis in the sector in which the counterparty operates in combination with the counterparty's weak position in this sector.

Also, for stage 3 allocation the Bank analyses the individually significant exposures for which trigger events for impairment occurred.

The bank has defined the following impairment trigger events:

- Clients from real estate sector;
- The debtor invokes significant financial difficulty;
- Delay in payments for more than 60 days for corporate clients and more than 30 days for private individuals;
- At least one of the Customer's facilities has been restructured in the last 12 months;
- The financial performance of the Customer is E, except from the customers that were classified in E since they did not present the last financial statements, but had a better rating based on the previous statements;
- The existence of evidences of becoming probable that the borrower will enter bankruptcy or other financial reorganization, in case of legal entities.

Even if at least one of the above-mentioned trigger events occurred, the Bank will individually assess each Customer to see if there is any objective evidence of impairment.

For Bank & Sovereign exposures, the Bank uses for staging purposes the following indicators representing significant increase in credit risk:

- Days past due - more than 2 working days past due since origination compared with the reporting date; and/or
- ECAI ratings - downgrade by at least two notches in ECAI ratings since origination compared with the reporting date for initial ratings above or equal to BB+/Ba1 and downgrade by at least one notch in ECAI ratings since origination compared with the reporting date for initial ratings below BB+/Ba1; In case of multiple ECAI ratings for the same counterparty are available the lowest rating of the two highest ratings is taken into consideration. For nostro accounts, the comparison between ratings will be made between the last reporting date and the current reporting date.

10.2 Expected credit loss calculation (Adjustments for impairment)

During 2025 the expected credit losses for loans portfolio were calculated according to IFRS 9 principles. The bank has elaborated its own policy regarding impairment of financial assets for the purposes of preparing MBR's individual financial statements in accordance with IFRS.

The Impairment methodology and procedure under IFRS 9 is approved by the Board of the Administrators of the Bank and the monthly expected credit losses calculation is reviewed by the Management Committee.

For the purpose of calculating expected loan losses, the Bank groups credit exposures into portfolios with similar credit risk characteristics. Portfolio segmentation is performed taking into account the common characteristics of the exposures, related on the one hand to the customer type (private individual/legal entity) and on the other hand to the type of credit facility (revolving / non-revolving, secured / unsecured). During 2025 the changes in the ECL volume was determined mainly by the increase of the loan portfolio and the updated parameters based on the historical data.

The evolution of the ECL volume and the distribution by stages for portfolio of clients from the following categories: Other financial companies, non-financial companies, Households in 2025 compared to 2024 are briefly presented below:

Stages	31.12.2025			31.12.2024		
	On balance exposure	Expected credit losses (ECL)	ECL coverage	On balance exposure	Expected credit losses (ECL)	ECL coverage
Stage 1	5,318,913,691	59,920,709	1.13%	4,653,168,689	50,633,199	1.09%
Stage 2	148,060,864	2,813,094	1.90%	321,778,359	12,354,251	3.84%
Stage 3	109,857,363	60,439,797	55.02%	77,502,851	35,495,100	45.80%
POCI	5,845,432	909,307	15.56%	12,362,064	305,243	2.47%
TOTAL	5,582,677,350	124,082,906	2.22%	5,064,811,963	98,787,793	1.95%

10.2.1 Expected credit loss for non-financial Customers

According to the internal Procedure, the Bank has calculated 3 categories of expected credit losses:

- Stage 1: If, at the reporting date, the credit risk on a financial instrument has not increased significantly since initial recognition, the Bank measured the loss allowance for that financial instrument at an amount equal to 12-month expected credit losses;
- Stage 2: If, at the reporting date, the credit risk on a financial instrument has increased significantly since initial recognition, the Bank measured the loss allowance for that financial instrument at an amount equal to lifetime expected credit losses;
- Stage 3: Expected credit losses for defaulted exposures;
- POCI: Expected credit losses Expected credit losses for POCI exposures.

For non-financial customers, in order to calculate the ECL, two different PD values are required:

- PD for 12 months: the estimated probability of default occurring in the next 12 months (or for the remaining life of the financial asset, if it is less than 12 months).
- PD for lifetime (Lifetime PD/LT PD): the estimated probability that an asset will go into default at a given time during its remaining lifetime.

The main requirements of IFRS9 for PD measurement are the following:

- The requirements regarding the life span mean that it is necessary to have a structure of PDs by terms.
- PD must represent a point of reference (Point in Time/PIT).
- PD must be conditioned by expectations regarding future macroeconomic conditions, including forward looking information.



For the purposes of IFRS 9, the adjustments (ECL) for Stage 1 accounts will be calculated using the first year structure of marginal PD on terms, while for accounts on Stage 2, the full-term structure of marginal PD will be used.

For the calculation of the PD values above, historical data on defaults, with a cohort type structure, are required. Each cohort includes the performing portfolio (without default) and the behavior is monitored for 12 months, in order to observe if defaults appear in any of the months of the following year. The frequency of the cohort will be quarterly.

Also, IFRS 9 requires the use of forward-looking components. In practice, this condition is translated by establishing a link between the PD curve used for the expected credit impairment adjustments and the macroeconomic factors. Based on the forecasts of macroeconomic factors, the PD curve is adjusted according to the created model.

The historical database for point PDs (pre-adjustment) is updated by the Bank at least once a year, together with macroeconomic forecasts for each scenario (baseline, pessimistic and optimistic). This is necessary to estimate the latest migration matrices and historical default rates. At the same time, it is not necessary to re-estimate the equations at each reporting date, unless the model is no longer working as planned.

Loss given default is a factor that determines the severity of a loss given default. Basically, LGD represents the value of the total exposure that the Bank expects not to recover in the event of a loan impairment.

In order to calculate the LGD, for the secured portfolio, the unsecured part of the specific portfolio is used, based on the present value of the future cash flows from the collaterals (PVC). It was decided to use the recovery rate (RR) from the collaterals due to the fact that the significant part of the defaulted exposures was recovered through the execution of the collaterals (foreclosure and bankruptcy procedures). In the LGD calculation, the following types of collaterals are exclusively taken into account:

- Letters of guarantee received from Banks and letters of guarantee issued by APIA, FNGCIMM, FRC and FGCR, to which the adjustment coefficients are applied in accordance with the relevant internal procedural framework;
- Real estate collaterals at the market value if they have been revalued according to the procedure in force or, taking into account the period that has passed since the expiration date of the valuation report, at the value reduced by the related adjustment coefficients.

For the unsecured portfolio, the recovery rate calculated based on the recoveries made during the period in which the client was in default is used. Considering that the IFRS9 standard requires the use of anticipatory components, the link between the loss given default curve (LGD) and macroeconomic factors was established. Thus, based on the forecasts of macroeconomic factors, the default loss curve is adjusted in accordance with the elaborated model.

10.2.2 Bank & Sovereign exposures

The Bank had as at 31.12.2025 exposures to Banks (money markets and other deposits) domestic & foreign, as well as bonds issued by the Romanian State. The expected credit losses for Banks & Sovereign exposure were calculated according to IFRS 9 principles.

According to the internal Procedure, the Bank has calculated 2 categories of expected credit losses:

- Stage 1: for exposures in stage 1 to which a 12 Month probability of default is assigned for ECL calculations;
- Stage 2: for exposures in stage 2 to which a lifetime probability of default is assigned for ECL calculations.



For Sovereign & Bank exposures, the Bank uses a simplified approach based on external credit ratings. The PD associated with the rating from the 10-year sovereign/ corporate migration matrix is used.

The fitted PD is calculated with an exponential fitting on the maximum PD from the three rating agencies, separately for corporate and sovereign. Also, a maximum PD between corporate and sovereign exposures is taken into consideration for the corporate fitted PD.

The PD for NBR exposures in RON is considered zero. In case of multiple ECAI ratings for the same counterparty are available the lowest rating of the two highest ratings is taken into consideration.

Where the issuer of the bond is not a rated entity, the rating associated with the country of incorporation will be used. Also, it was assumed that no Bank can have a rating above the rating of the country of incorporation (origin).

For determining LGD for Sovereign & Bank exposures, recovery rates are historical averages of bond prices in default, published by Moody's: 55% for non-investment grade exposures (below Baa3, BBB-, BBB- as per rating agencies hierarchy) and 45% for investment grade exposures. Hence flat LGD of 45% is applied for non-investment grade exposures and flat LGD of 55% is applied for investment grade exposures, unless other haircuts would be required individually.

10.3 Credit risk mitigation techniques

The Bank employs a comprehensive collateral management process based on documented procedures along with appropriate credit risk mitigation techniques. This thesis is also supported by the fact that appropriate procedures for loan and collateral documentation/Administrators are in place. Moreover, the Legal Department provides advice on collaterals accepted by the Bank along with general legal assistance in collateral Administrators in terms of documentation and alignment with laws and regulatory requirements.

Also, for the purpose of managing the credit risk, the Bank fulfils the following legal requirements:

- Ensures that the collateral are legally enforceable in all jurisdictions which are relevant at the time of the conclusion of the credit agreement;
- Ensures that the collateral contracts are valid, i.e., all legal requirements for concluding the contracts are met.

The collateral revaluation is performed during the collateral periodic reviews. The evaluation methods used are compliant with the Assets Valuation Standards developed by ANEVAR, standards in accordance with International Valuation Standards and internal regulations corresponding to the collateral evaluation processes. As per the provisions of the internal procedure, the Bank performs regular revaluation of the immovable assets by approved external evaluators. The frequency for regular revaluation of immovable properties is stipulated as 3 years for residential properties and 1 year for all other properties.

The Bank accepts all types of collaterals according to the internal Procedures and NBR Norms.

The collaterals accepted by the Bank are personal and real: mortgages on immovable properties: residential properties, commercial properties and lands, mortgages on movable properties: on current accounts, on collateral deposits, on equipment, ships, assignments of: insurance policies, rental contracts, Sale-Purchase contracts, commercial contracts, payment instruments, letters of guarantee from financial institution and other types of collaterals easy to be evaluated and slightly sensitive to the economic evolutions and possible to enforce taking into consideration the market frame.

In accordance with Regulation (EU) No 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with further amendments, Vista Bank Romania (SA) accepts the following instruments for mitigation of credit risk:

- Unfunded credit protection (guarantees) from: central Administrators and central banks, regional Administrators and local authorities, credit institutions;



- Funded credit protection: cash deposits, debt securities and material collaterals: residential and commercial real estate properties, other physical collaterals.

Revaluation of material collaterals

The estimation of the market value of the collaterals accepted by the bank is performed according to the stipulations of the Assets Valuation Standards, developed by ANEVAR, standards in accordance with International Valuation Standards, in compliance with the requirements from NBR regulations (Regulation no.5/2013 with its further amendments).

The estimation of the market value (equal to the fair value) of collaterals is performed periodically in order to:

- deduct the collaterals value from the exposure within the computation of LGD (Loss Given Default) and of necessary ECL (Expected Credit Losses);
- recognize the value of collaterals that can be taken into account as credit risk mitigation, when determining the risk weighted value of exposures, in order to compute the minimum capital requirements for credit risk.

The values of the collaterals have to be monitored frequently as follows:

- a) in case of residential real estates, the valuation has to be performed at least once at every three years and for the commercial real estates and vacant land type building, the valuation has to be performed once per year.
- b) in case of tangible goods, the valuation has to be performed at least once per year
- c) residential collateral related to non-performing exposures shall be revalued annually.

In addition, valuation of collaterals may be necessary during the validity of the loan in certain specific cases (when are analysed operations of replacing existing exposures or when are analysed new operations having joint collaterals with other existing loans), according to Bank's regulations. The valuation of collaterals is performed by external valuers or internal valuers of the bank, members of ANEVAR (Romanian National Valuers Association).

Information on exposure value covered by financial collateral, other collateral, guarantees and credit derivatives are understood as information on outstanding secured exposures and the secured amount within those exposures. Related information as of 31.12.2025 is presented below:

10.4 General quantitative information on credit risk

Template EU CR1: Performing and non-performing exposures and related provisions

	Gross carrying amount/nominal amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collaterals and financial guarantees received	
	Performing exposures			Non-performing exposures				Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3	of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3					
005	Cash balances at central banks and other demand deposits	2,378,380,678	2,378,380,678	-	-	-	-	(80,016)	(80,016)	-	-	-	-	-	-	-
010	Loans and advances	5,954,423,778	5,798,870,396	155,553,382	115,702,795	-	109,857,363	(63,256,248)	(60,272,175)	(2,984,073)	(61,349,104)	-	(60,439,797)	(8,802,501)	3,381,377,815	49,744,767
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	984,081	984,081	-	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	467,656,699	467,656,699	-	-	-	-	(80,363)	(80,363)	-	-	-	-	-	-	-
050	Other financial corporations	64,427,317	64,427,317	-	-	-	-	(1,310,391)	(1,310,391)	-	-	-	-	-	12,755,543	-
060	Non-financial corporations	4,629,249,203	4,513,608,758	115,640,445	84,210,162	-	82,148,897	(59,606,776)	(57,000,461)	(2,606,315)	(56,648,622)	-	(55,802,207)	(8,802,501)	2,612,957,049	22,952,693
070	Of which: SMEs	3,926,371,439	3,815,826,178	110,545,261	43,837,423	-	41,776,158	(47,494,836)	(45,076,136)	(2,418,700)	(16,275,883)	-	(15,429,468)	(8,802,501)	2,329,408,263	21,368,827
080	Households	792,106,478	752,193,541	39,912,937	31,492,633	-	27,708,466	(2,258,718)	(1,880,960)	(377,758)	(4,700,482)	-	(4,637,590)	-	755,665,223	26,792,074
090	Debt Securities	1,775,198,478	1,775,198,478	-	-	-	-	(2,220,597)	(2,220,597)	-	-	-	-	-	-	-
100	Central banks															
110	General governments	1,775,198,478	1,775,198,478	-	-	-	-	(2,220,597)	(2,220,597)	-	-	-	-	-	-	-
120	Credit institutions															
130	Other financial corporations															
140	Non-financial corporations															
150	Off-balance sheet exposures	1,843,136,995	1,783,475,971	59,661,024	25,066	-	25,066	7,099,756	6,826,985	272,771	10,127	-	10,127		-	-
160	Central banks															
170	General governments															
180	Credit institutions	122,364	122,364	-	-	-	-	-	-	-	-	-	-		-	-
190	Other financial corporations	32,563,946	32,563,946	-	-	-	-	16,947	16,947	-	-	-	-		-	-
200	Non-financial corporations	1,791,591,648	1,732,424,650	59,166,998	-	-	-	7,006,508	6,740,704	265,804	-	-	-		-	-
210	Households	18,859,037	18,365,011	494,026	25,066	-	25,066	76,301	69,334	6,967	10,127	-	-		-	-
220	Total	11,951,139,929	11,735,925,523	215,214,406	115,727,861	-	109,882,429	(72,656,617)	(69,399,773)	(3,256,844)	(61,359,231)	-	(60,449,924)	(8,802,501)	3,381,377,815	49,744,767

Template EU CR1-A – Maturity of exposures

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances		1,740,368,854	1,585,220,301	2,559,534,955	60,397,111	5,945,521,221
2	Debt securities		539,717,568	1,140,477,831	92,782,482		1,772,977,881
3	Total	-	2,280,086,422	2,725,698,132	2,652,317,437	60,397,111	7,718,499,102

Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	Of which secured by
						credit derivatives
		a	b	c	d	e
1	Loans and advances	4,892,699,301.00	3,431,122,582.00	3,252,724,100.00	178,398,482.00	-
2	Debt securities	1,772,977,881.00	-	-	-	-
3	Total	6,665,677,182.00	3,431,122,582.00	3,252,724,100.00	178,398,482.00	-
4	<i>Of which non-performing exposures</i>	4,608,924.00	49,744,767.00	48,119,677.00	1,625,090.00	-
EU-5	<i>Of which defaulted</i>	4,608,924.00	49,744,767.00			

Template EU CR4 – standardised approach – Credit risk exposure and CRM effects

Exposure classes	Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEA	RWEA density (%)
	a	b	c	d	e	f
1 Central governments or central banks	3,817,059,527.00	-	4,286,738,606.50	10,485,101.26	165,169,050.80	3.84%
2 Non-central government public sector entities	-	-	-	-	-	0.00%
EU 2a Regional government or local authorities	-	-	-	-	-	0.00%
EU 2b Public sector entities	-	-	-	-	-	0.00%
3 Multilateral development banks	-	-	-	-	-	0.00%
EU 3a International organisations	-	-	-	-	-	0.00%
4 Institutions	760,777,707.00	122,364.00	819,872,637.00	135,791,382.00	260,094,578.90	27.22%
5 Covered bonds	-	-	-	-	-	0
6 Corporates	3,753,087,916.68	1,379,478,877.63	3,464,953,383.52	266,405,150.56	3,097,307,968.04	83.01%
6.1 Of which: Specialised Lending	1,201,804,480.68	184,524,233.79	1,124,227,505.43	25,803,061.36	868,350,467.45	75.51%
7 Subordinated debt exposures and equity	8,037,053.00	-	8,037,053.00	-	8,037,053.00	100.00%
EU 7a Subordinated debt exposures	-	-	-	-	-	0
EU 7b Equity	8,037,053.00	-	8,037,053.00	-	8,037,053.00	100.00%
8 Retail	612,128,853.65	326,907,461.54	436,476,422.94	45,174,838.29	296,228,529.97	61.50%
9 Secured by mortgages on immovable property and ADC exposures	1,039,023,982.65	129,639,123.40	913,259,767.19	27,650,960.01	467,571,820.93	49.69%
9.1 Secured by mortgages on residential immovable property - non IPRE	859,839,342.18	14,639,516.77	734,075,126.72	2,459,251.78	320,261,617.22	43.48%
9.2 Secured by mortgages on residential immovable property - IPRE	86,868,711.38	5,799,297.88	86,868,711.38	160,776.73	29,963,343.12	34.43%
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	0
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	0
9.5 Acquisition, Development and Construction (ADC)	92,315,929.09	109,200,308.75	92,315,929.09	25,030,931.50	117,346,860.59	100.00%
10 Exposures in default	54,353,691.88	14,939.51	48,480,647.52	5,975.80	58,667,275.04	121.00%
EU 10a Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	0
EU 10b Collective investment undertakings	-	-	-	-	-	0
EU 10c Other items	399,652,809.00	-	399,652,809.00	-	300,432,751.00	75.17%
11 Not applicable	-	-	-	-	-	-
12 TOTAL	10,444,121,540.86	1,836,162,766.08	10,377,471,326.67	485,513,407.92	4,653,509,027.68	42.84%



Template EU CR5 – standardised approach

Exposure classes	Risk weight																				Total
	0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	
	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	z
1 Central governments or central banks	3,098,235,536	-	-	1,085,812,588	-	-	-	-	-	113,175,584	-	-	-	-	-	-	-	-	-	-	4,297,223,708
2 Non-central government public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 2a Regional governments or local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 2b Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 3a International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Institutions	-	-	-	-	741,020,261	15,517,090	-	55,063,203	-	117,706,693	-	-	-	-	-	26,356,772	-	-	-	-	955,664,019
5 Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	720,662,812	2,888,023,682	-	122,672,040	-	3,731,358,534
6.1 Of which: Specialised Lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	720,662,812	306,695,715	-	122,672,040	-	1,150,030,567
7 Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,037,053	-	-	-	8,037,053
EU 7a Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,037,053	-	-	-	-	8,037,053
8 Retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	481,651,261	-	-	-	-	-	-	481,651,261
9 Secured by mortgages on immovable property and ADC exposures	-	-	-	-	465,732,153	33,940,887	1,022,007	-	35,681,023	-	10,110,867	-	176,274,801	-	-	211,874,284	6,113,927	-	-	160,777	940,910,727
9.1 Secured by mortgages on residential immovable property - non IPRE	-	-	-	-	465,732,153	-	-	-	-	-	-	-	176,274,801	-	-	94,527,424	-	-	-	-	736,534,378
9.1.1 No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	132,145,436	-	-	83,159,660	-	-	-	-	215,305,086
9.1.2 loan splitting applied (secured)	-	-	-	-	465,732,153	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	465,732,153
9.1.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	44,129,366	-	-	11,367,774	-	-	-	-	55,497,139
9.2 Secured by mortgages on residential immovable property - IPRE	-	-	-	-	-	33,940,887	1,022,007	-	35,681,023	-	10,110,867	-	-	-	-	-	6,113,927	-	-	160,777	87,029,488
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3.1 No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3.2 loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.3.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9.5 Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	117,346,861	-	-	-	-	117,346,861
10 Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	35,134,036	-	-	-	13,352,587	48,486,623
EU 10a Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10c Other items	99,220,058	-	-	-	-	-	-	-	-	-	-	-	-	-	-	300,432,751	-	-	-	-	399,652,809
11 not applicable	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 11c TOTAL	3,197,455,594	-	-	1,085,812,588	1,206,752,414	49,457,977	1,022,007	55,063,203	35,681,023	230,882,277	10,110,867	-	657,926,062	720,662,812	-	3,469,858,579	6,113,927	-	122,672,040	13,513,364	10,862,984,735

10.5 Counterparty credit risk

Template EU CCR1 – Analysis of CCR exposure by approach

		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU - Original Exposure Method (for derivatives)				1.4				
EU2	EU - Simplified SA-CCR (for derivatives)	6,940,116.00	37,128,465.40		1.4	61,696,014.00	61,696,014.00	61,696,014.00	61,696,014.00
1	SA-CCR (for derivatives)				1.4				
2	IMM (for derivatives and SFTs)								
2a	<i>Of which securities financing transactions netting sets</i>								
2b	<i>Of which derivatives and long settlement transactions netting sets</i>								
2c	<i>Of which from contractual cross-product netting sets</i>								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)								
5	VaR for SFTs								
6	Total					61,696,014.00	61,696,014.00	61,696,014.00	61,696,014.00

Template EU CVA 2 – Credit valuation adjustment risk under the Full Basic Approach (F-BA)

		Own Funds Requirements	Notional of CVA hedges
1	BACVA ^{csr-unhedged}	1,397,013.00	
2	BACVA ^{csr-hedged}	-	
3	Total	1,397,013.00	
EU 4	Single-name CDS		-
EU 5	Index CDS		-
EU 6	Total		-



Template EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

	Exposure classes	Risk weight											Total exposure value	
		a	b	c	d	e	f	g	h	i	j	k		
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others		
1	Central governments or central banks													
2	Regional government or local authorities													
3	Public sector entities													
4	Multilateral development banks													
5	International organisations													
6	Institutions	-	-	-	-	-	-	-	-	61,696,014.00	-	-		61,696,014.00
7	Corporates													
8	Retail													
9	Institutions and corporates with a short-term credit assessment													
10	Other items													
11	Total exposure value	-	-	-	-	-	-	-	-	61,696,014.00	-	-		61,696,014.00



Annex I – Disclosure templates: forbearance

The ratio between the gross carrying amount of nonperforming loans and advances and the total amount of loans and advances is less than 5% so the templates EU CR2a, EU CQ2, EU CQ6 and EU CQ8 are not applicable.

Template EU CQ1: Credit quality of forborne exposures

		Gross carrying amount/ Nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	6,965,953.00	11,447,622.00	11,447,622.00	11,447,622.00	(100,395.00)	(1,943,236.00)	15,882,281.00	9,422,158.00
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	-	-	-	-	-	-	-	-
060	Non-financial corporations	2,923,271.00	4,753,546.00	4,753,546.00	4,753,546.00	(27,590.00)	(1,351,316.00)	5,844,922.00	3,320,002.00
070	Households	4,042,682.00	6,694,076.00	6,694,076.00	6,694,076.00	(72,805.00)	(591,920.00)	10,037,359.00	6,102,156.00
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	-	-	-	-	-	-	-	-
100	Total	6,965,953.00	11,447,622.00	11,447,622.00	11,447,622.00	(100,395.00)	(1,943,236.00)	15,882,281.00	9,422,158.00

Annex II – Disclosure templates: non-performing exposures
Template EU CQ3: Credit quality of performing and non-performing exposures by past due days

		Gross carrying amount / Nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or Past due < 30 days	Past due > 30 days < 90 days		Unlikely to pay that are not past-due or past-due < = 90 days	Past due > 90 days <= 180 days	Past due > 180 days <= 1 year	Past due > 1 year <= 2 years	Past due > 2 year <= 5 years	Past due > 5 year <= 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	2,378,380,678.00	2,378,380,678.00	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	5,954,423,778.00	5,930,733,214.00	23,690,564.00	115,702,795.00	78,554,605.00	3,766,704.00	6,106,088.00	15,163,225.00	8,536,969.00	1,513,939.00	2,061,265.00	112,066,390.00
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	984,081.00	984,081.00	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	467,656,699.00	467,656,699.00	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	64,427,317.00	64,427,317.00	-	-	-	-	-	-	-	-	-	-
060	Non-financial corporations	4,629,249,203.00	4,615,181,811.00	14,067,392.00	84,210,162.00	51,647,167.00	231,090.00	5,709,848.00	15,059,121.00	8,388,586.00	1,113,085.00	2,061,265.00	84,210,162.00
070	Of which SMEs	3,926,371,439.00	3,912,304,047.00	14,067,392.00	43,837,423.00	11,274,428.00	231,090.00	5,709,848.00	15,059,121.00	8,388,586.00	1,113,085.00	2,061,265.00	43,837,423.00
080	Households	792,106,478.00	782,483,306.00	9,623,172.00	31,492,633.00	26,907,438.00	3,535,614.00	396,240.00	104,104.00	148,383.00	400,854.00	-	27,856,228.00
090	Debt Securities	1,775,198,478.00	1,775,198,478.00	-	-	-	-	-	-	-	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	1,775,198,478.00	1,775,198,478.00	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
150	Off-balance sheet exposures	1,843,136,995.00			25,066.00								25,066.00
160	Central banks	-			-								-
170	General governments	-			-								-
180	Credit institutions	122,364.00			-								-
190	Other financial corporations	32,563,946.00			-								-
200	Non-financial corporations	1,791,591,648.00			-								-
210	Households	18,859,037.00			25,066.00								25,066.00
220	Total	11,951,139,929.00	10,084,312,370.00	23,690,564.00	115,727,861.00	78,554,605.00	3,766,704.00	6,106,088.00	15,163,225.00	8,536,969.00	1,513,939.00	2,061,265.00	112,091,456.00

Template EU CQ4: Quality of non-performing exposures by geography



		a	b	c	d	e	f	g
		Gross carrying/Nominal amount			of which: subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			of which: non-performing					
				of which: defaulted				
010	On balance sheet exposures							
020	Belgium	15,854,994.00			15,854,994.00	(702.00)		
030	Cyprus	25,666.00			25,666.00	(220.00)		
040	Spain	56,785.00			56,785.00	(1,285.00)		
050	Greece	542,768,502.00			542,768,502.00	(2,824,913.00)		
060	Italy	103,494.00			103,494.00	(889.00)		
070	Netherlands	21,795.00			21,795.00	(17.00)		
080	United States	14,530,781.00			14,530,781.00	(377.00)		
090	Switzerland	5,757,081.00			5,757,081.00	(5,375.00)		
100	Israel	11,570.00			11,570.00	(100.00)		
110	Romania	9,319,299,500.00	115,487,567.00	111,851,162.00	9,319,299,500.00	(121,912,952.00)		
120	Denmark	264,512.00			264,512.00	(2,420.00)		
130	Portugal	19,835,883.00			19,835,883.00	(444.00)		
140	United Kingdom	1,298,253.00	215,228.00	215,228.00	1,298,253.00	(5,837.00)		
150	France	11,066,245.00			11,066,245.00	(11,923.00)		
160	Liberia	83,793,868.00			83,793,868.00	(693,426.00)		
170	Marshall Islands	197,063,870.00			197,063,870.00	(1,424,032.00)		
180	United Arab Emirates	185,103.00			185,103.00	(307.00)		
190	Saint Kitts and Nevis	10,901,536.00			10,901,536.00	(19,231.00)		
200	Canada	382,094.00			382,094.00	(635.00)		
210	Ireland	10,463.00			10,463.00	(16.00)		
220	Austria	322,926.00			322,926.00	(542.00)		
230	Germany	150,808.00			150,808.00	(322.00)		
240	Off balance sheet exposures							
250	Cyprus	89,334.00					322.00	
260	Greece	211,978,940.00					2,655,996.00	
270	Israel	115,400.00					414.00	
280	Italy	21,999.00					96.00	
290	Romania	1,583,219,965.00	25,066.00	25,066.00			4,078,978.00	
300	Jersey	10,196,999.00					-	
310	Marshall Islands	1,539,995.00					14,941.00	
320	Saint Kitts and Nevis	423,660.00					1,529.00	
330	Malta	35,574,700.00					357,604.00	
340	Austria	1,069.00					3.00	
350	Total	12,066,867,790.00	115,727,861.00	112,091,456.00	10,223,705,729.00	(126,905,965.00)	7,109,883.00	-

Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry

		Gross carrying amount			Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures	
			of which: non-performing				
			of which: defaulted	of which: loans and advances subject to impairment			
010	Agriculture, forestry and fishing	1,116,959,978.00	47,479,744.00	47,479,744.00	1,116,959,978.00	(54,154,689.00)	-
020	Mining and quarrying	-	-	-	-	-	-
030	Manufacturing	319,471,267.00	4,579,023.00	4,579,023.00	319,471,267.00	(5,845,084.00)	-
040	Electricity, gas, steam and air conditioning supply	927,720,492.00	-	-	927,720,492.00	(14,380,782.00)	-
050	Water supply	20,422,379.00	-	-	20,422,379.00	(367,679.00)	-
060	Construction	554,297,811.00	15,914,559.00	15,914,559.00	554,297,811.00	(14,486,044.00)	-
070	Wholesale and retail trade	732,789,112.00	10,107,944.00	10,107,944.00	732,789,112.00	(15,211,631.00)	-
080	Transport and storage	326,098,219.00	5,015,807.00	5,015,807.00	326,098,219.00	(3,946,096.00)	-
090	Accommodation and food service activities	33,561,824.00	-	-	33,561,824.00	(291,918.00)	-
100	Information and communication	1,982,815.00	-	-	1,982,815.00	(13,287.00)	-
110	Financial and insurance activities	-	-	-	-	-	-
120	Real estate activities	471,937,898.00	1,113,085.00	1,113,085.00	471,937,898.00	(5,007,285.00)	-
130	Professional, scientific and technical activities	70,508,731.00	-	-	70,508,731.00	(970,001.00)	-
140	Administrative and support service activities	7,004,823.00	-	-	7,004,823.00	(110,384.00)	-
150	Public administration and defense, compulsory social security	-	-	-	-	-	-
160	Education	7,363,468.00	-	-	7,363,468.00	(60,340.00)	-
170	Human health services and social work activities	85,844,985.00	-	-	85,844,985.00	(794,319.00)	-
180	Arts, entertainment and recreation	18,127,408.00	-	-	18,127,408.00	(156,089.00)	-
190	Other services	19,368,155.00	-	-	19,368,155.00	(459,770.00)	-
200	Total	4,713,459,365.00	84,210,162.00	84,210,162.00	4,713,459,365.00	(116,255,398.00)	-



Annex V – Disclosure templates: foreclosed assets

Template EU CQ7: Collateral obtained by taking possession and execution processes

		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property Plant and Equipment (PP&E)	-	-
020	Other than PP&E	25,501,128.00	(3,392,045.00)
030	<i>Residential immovable property</i>	3,456,174.00	(489,935.00)
040	<i>Commercial Immovable property</i>	22,044,954.00	(2,902,110.00)
050	<i>Movable property (auto, shipping, etc.)</i>	-	-
060	<i>Equity and debt instruments</i>	-	-
070	<i>Other collateral</i>	-	-
080	Total	25,501,128.00	(3,392,045.00)

11. MARKET RISK EXPOSURE

VISTA BANK (ROMANIA) S.A. has a trading portfolio classified as a small trading book business, consequently, the Bank does not calculate capital requirements for market risk related to trading portfolio (under Article 92(3)(b) of the CRR, Regulation (EU) No 575/2013). The only capital requirements relating to market risk are those for open foreign currency position, which are calculated in accordance with Regulation 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms with subsequent amendments. Due to the fact that the total net open currency position was less than 2% of the bank's own funds no capital requirements (Pillar 1) were necessary for currency risk at 31.12.2025.

The Bank uses the exposure method (Value at Risk) for monitoring currency risk. VaR values are used internally as a tool for risk management. Risk Management Department calculates daily VaR for the open foreign currency position using a confidence interval of 99% and holding period of 1 day. VaR calculation is done on the assumption that variations of individual risk factors (exchange rates) have a normal distribution. The average daily VaR indicator for the last three months and annualized values of VaR are also calculated.

12. EQUITY EXPOSURES NOT INCLUDED IN THE TRADING BOOK

Shares that are not included in the trading portfolio are included in banking book portfolio. Investments in shares included in banking book portfolio are recognized at their fair value as follows:

Share	Issuer	Currency	Fair Value (RON equivalent)
Shares	Credit Bureau	RON	89.260
Shares	Transfond	RON	2.043.552
Shares	Visa	USD	2.250.859
Shares	Swift	EUR	237.387

13. INTEREST RATE RISK

For the purposes of monitoring and reporting the potential impact of interest rate risk, Risk Management Department is responsible for drafting the IRRBB report on the spread between interest rates. The report aims to assess interest rate risk in terms of earnings (unrealized earnings / loss in the event of a change in the yield curve across all maturities and for each significant currency from the balance sheet) and also from the economic value perspective (changes of economic value).

On 31.12.2025 the potential change of Bank's economic value as a result of the change in interest rate levels following the application of the supervisory shock scenarios referred to in Article 1(1) of Delegated Regulation (EU) 2024/856 causing the largest decrease in EVE is RON 49,056,347 representing 5.40% of Tier 1 own funds. When calculating the aggregate change for each interest rate shock scenario, institutions shall add together any negative and positive changes occurring in each currency. Positive changes shall be weighted by a factor of 50%. Weighted gains shall be recognized up to the greater of (i) the absolute value of negative changes in EUR or ERMII currencies and (ii) the result of applying a factor of 50% to the positive changes of ERMII currencies or EUR.

Template EU IRRBB1 - Interest rate risks of non-trading book activities



Supervisory shock scenarios		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
		31/12/2025	30/09/2025	31/12/2025	30/09/2025
1	Parallel up	-49,056,347	- 59,007,511	-12,372,423	-8,755,822
2	Parallel down	59,376	947,926	-79,629,852	-85,040,079
3	Steeper	-1,167,111	-3,222,917		
4	Flattener	-14,171,163	-13,738,140		
5	Short rates up	-21,033,621	-24,979,812		
6	Short rates down	-3,726,216	-1,309,382		

14. LEVERAGE EFFECT

Leverage effect is a financial technique which has as scope the improvements of the ROE. The leverage ratio is calculated in order to reduce the bank’s liabilities through the set-up of a minimum level of the equity versus the bank’s assets.

The leverage effect makes a connection between the ROA and ROE. Its multiplier effect on the ROE is known as “leverage effect”.

The calculation mode and the items included is similar with the solvency ratio but in a simplified manner based on accounting data, not adjusted in terms of risk. The scope of monitoring this ratio is to control the risk of an inflated balance sheet.

The leverage ratio has two objectives: first is to limit the excessive leverage effect and the second to action as a protective mechanism for the capital requirements.

$$\text{Leverage ratio} = \text{Capital (Tier 1)/Total exposures (not-adjusted)} > 3\%$$

Bank monitors the level and the modifications of leverage ratio, and also the associated risk as part of the ICAAP process.

Regulation UE 575/2013, established uniform rules regarding the general prudential requirements as follows:

- own funds requirements regarding the quantifiable items, uniform and standardized of credit risk, market risk, operational risk and settlement risk
- requirements regarding the limitation of large exposures
- requirements regarding the liquidity, regarding the quantifiable items, uniform and standardized of the liquidity risk
- reporting requirements regarding the own funds, large exposures, liquidity and leverage effect
- requirements regarding the information publishing.

Leverage effect represents the relative dimensions of assets items and off-balance sheet items in relation to the own funds of the bank.

The associated risk of excessive leverage effect means the risk resulted from the vulnerability towards a leverage effect which can lead to not-estimated measures to correct the business plan.

Leverage effect is defined as: „capital requirements" (numerator), divided at "level of exposure" (nominator). The leverage ratio shall be calculated as bank's capital measure (Tier 1 capital) divided by bank's total exposure measure (the sum of the exposure values of all assets and off-balance sheet items)



and shall be expressed as a percentage.

Bank shall determine the exposure value of off-balance sheet items, in accordance with following conversion factors:

- a) the conversion factor to be applied to the nominal value for undrawn credit facilities, which may be cancelled unconditionally at any time without notice, is 10%; for the period from January 1, 2025, to December 31, 2029, a conversion factor of 0% will be used for unconditional revocable commitments.
- b) the conversion factor for trade finance related off-balance sheet items, warranties, including tender and performance bonds and associated advance payment and retention guarantees, and guarantees not having the character of credit substitutes, is 20 %;
- c) the conversion factor for the undrawn amount of commitments, regardless of the maturity of the underlying facility, unless they fall under another category, is 40%;
- d) the conversion factor for performance bonds, bid bonds, warranties and standby letters of credit related to particular transactions and similar transaction-related contingent items, excluding trade finance off-balance-sheet items referred to in point b), is 50 %;
- e) the conversion factor for all other off-balance sheet items is 100 %.

Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

		Applicable amount
1	Total assets as per published financial statements	10,466,808,943.00
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	61,696,014.00
9	Adjustment for securities financing transactions (SFTs)	-
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	659,873,767.00
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-
12	Other adjustments	(22,687,402.14)
13	Total exposure measure	11,165,691,321.86



Template EU LR2 - LRCom: Leverage ratio common disclosure

		CRR leverage ratio exposures	
		a	b
		31.12.2025	31.12.2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	10,597,239,382.96	8,899,518,976.00
2	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	{Adjustment for securities received under securities financing transactions that are recognised as an asset}	-	-
5	(General credit risk adjustments to on-balance sheet items)	(130,284,168.10)	(106,034,731.00)
6	(Asset amounts deducted in determining Tier 1 capital)	(22,833,674.00)	(21,036,748.00)
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	10,444,121,540.86	8,772,447,497.00
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	-	-
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	9,716,162.00	1,536,969.00
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	-	-
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	51,979,852.00	26,672,830.00
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original Exposure Method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	Total derivatives exposures	61,696,014.00	28,209,799.00
Securities financing transaction (SFT) exposures			
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	-	-
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	Total securities financing transaction exposures		
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	1,836,162,766.00	1,493,740,378.00
20	(Adjustments for conversion to credit equivalent amounts)	(1,176,288,999.00)	(946,888,647.00)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	Off-balance sheet exposures	659,873,767.00	546,851,731.00
Excluded exposures			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m	(Total exempted exposures)	-	-



Capital and total exposure measure			
23	Tier 1 capital	907,989,990.00	696,791,139.40
24	Total exposure measure	11,165,691,321.86	9,347,509,027.00
Leverage ratio			
25	Leverage ratio	8.13%	7.45%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8.13%	7.45%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	8.13%	7.45%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	3.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure		
Disclosure of mean values			
28	Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	-	
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	-	
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	11,165,691,321.86	9,347,509,027.00
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	11,165,691,321.86	9,347,509,027.00
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	8.13%	7.45%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	8.13%	7.45%

Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	10,466,955,214.86
EU-2	Trading book exposures	-
EU-3	Banking book exposures, of which:	10,466,955,214.86
EU-4	Covered bonds	-
EU-5	Exposures treated as sovereigns	3,817,059,527.00
EU-6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-
EU-7	Institutions	760,777,707.00
EU-8	Secured by mortgages of immovable properties	1,039,023,982.65
EU-9	Retail exposures	612,128,853.65
EU-10	Corporates	3,753,087,916.68
EU-11	Exposures in default	54,353,691.88
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	430,523,536.00



15. REMUNERATION POLICY

The basic principles of the remuneration framework applied within the Bank are defined in the Remuneration Policy. The Policy is accessible and applicable to all employees of the Bank, and it is characterised by clarity and transparency, based on the Bank's long term objectives and strategy and general results, values and long-term interests including the Bank's control environment.

15.1 Incentives and remuneration/ compensation structure of the Bank

The remuneration within Vista Bank (Romania) SA contains:

- a fix part - represented by the paid annual salary
- a variable part – represented by the incentives/ bonuses

The fix remuneration (annual salary) is represented by the salary and other salary related incomes, in the form of regular monetary payments, which remunerate the proper performance of employee, in terms of his professional competences at the level set in the annual performance indicators.

The variable remuneration is a combination of remuneration schemes intended to:

- a) Increase employee engagement in the achievement of the Bank's long-term objectives,
- b) Recognize employee performance over a long-term basis while discouraging excessive risk taking,
- c) Encourage employees to take into account the long-term interests of the institution's shareholder,
- d) Ensure a fair distribution of the extra value between shareholders and employees and,
- e) Retain and attract high performers.

The variable remuneration involves the following:

Cash Bonus Scheme (Distributed as Exceptional or Normal), which takes the form of cash payment.

There are two types of cash payments within the Cash Bonus Scheme in Vista Bank Romania (SA):

- Exceptional Cash Bonus - this is distributed to employees of the Identified and Non-Identified (Special) Groups
- Normal Cash Bonus - this is distributed to employees in the Non-Identified (Regular Group) who have an appraisal score that reflects excellent, very good and good performance

Guaranteed variable remuneration is not part of prospective remuneration plans.

Variable remuneration is subject to vesting, claw back and malus criteria. Variable remuneration may be retracted at its entire value or partially in the case of a proved fraud or when performance evaluation is based on the information of further possibility of being inconsistently incorrect.

15.2 Information related to compensation policies and practices for those categories of staff whose professional activities have a significant impact on the risk profile

The Bank established a Nomination Committee, formed by the members of the Management Body of the Bank that do not have an executive function in the Bank. The Nomination Committee periodically evaluates, but at least once a year, the knowledge, competencies and work experience of each member of the Management Body of the Bank and of the Management Body of the Bank as a whole, and report to the latter accordingly.

15.2.1 Information on the relationship between the total remuneration and performance

The Remuneration Policy within the Bank is connected with the Performance Appraisal Procedure.

Thus, the performance appraisal process is properly formalized and transparent for employees.

According to Performance Appraisal Procedure, the performance appraisal system focuses on the following two basic elements:



- Results: The extent to which quantitative and qualitative goals, which flow from and are aligned with the team objectives and the strategic goals of the Bank, are realized. Individual goals are directly linked with the employee's Job Description and to the Key Performance Indicators of the job.
- Behaviours: These are directly related to and flow from predetermined Competencies (Shared Competencies: Customer Service Orientation, Teamwork & Cooperation, Compliance with Procedures, Flexibility, Initiative and Achievement Orientation), and Management Competencies: Developing Others, Leadership, Impact & Influence and Change Management).

In view of the above, the performance appraisal system assesses both the degree to which the individual achieves results – “WHAT” – as well as “HOW” these results are achieved.

15.2.2 Design features of the remuneration system

The fixed remuneration system within the Bank it is based on the following criteria:

- Job Evaluation – value of job position.
- Potential of the employee.
- Market Value.
- Fixed compensation paid by competition for similar job positions and employee abilities.
- Local employment legislation (Labour Code).

According to legal provisions variable Compensation is subject to vesting, claw back and malus criteria.

15.2.3 The relationship between the fixed and the variable remuneration

For Identified Staff, namely the Executive Members of the Board of Administrators, Members of the Management Committee, the ratio between the fixed and the variable remuneration is established as follows:

- The maximum ratio on the variable component in relation to the fixed component is set at 100%.
- At least 40% of the variable component (up to 60% for very large amounts) is deferred over a period of 3 years and vested on a pro rata basis of 1/3 per year.

For Identified Staff – Internal Control Functions, other staff deemed to have a significant impact on the risk profile of the bank:

- The maximum ratio on the variable component in relation to the Fixed Component is set at **50%**.
- At least 40% of the variable component is deferred over a period of 3 years and vested on a pro-rata basis of 1/3 per year.

As regards to the first deferred part, it must not be paid earlier than 12 months from the start of the deferral period. The deferral period ends when entitlement to the variable remuneration was granted or if the amount was reduced to zero because of a malus agreement.

For all Bank's staff, except the above-mentioned positions, the proportion of variable and fix remuneration is set as follows:

- maximum level of the variable remuneration is of 100% from fix remuneration
- under normal conditions the variable remuneration is granted upon end of the accumulation period.

15.2.4 Information regarding the performance criteria underpinning the right to shares, options or other variable components of remuneration

The Bank has not granted in 2025 shares, options or other variable component of the remuneration.

15.2.5 Variable remuneration

- Must not be paid by means or methods that are not in accordance with the Bank organizational culture, long-term objectives and strategy and internal control framework
- Has to be aligned with the risk strategy of the Bank, the size of the Bank and its internal organization and activities
- Starts from assessing the Bank's performance and organizational structure in which it operates and the individual performance.
- Does not limit the Bank's capacity to strengthen its capital base / liquidation in order for it to comply with the prudential requirements of the regulator on capital ratios and liquidity;
- It is not paid through means or methods that facilitate the circumvention of the regulations in force
- Allocation of variable compensation components will be made taking into account all current and future risks
- It should not exceed 100% of the fix component of total remuneration for each identified staff
- In case of misconduct, the Bank may decide to cancel granting it, depending on the type of offense.

15.2.6 Aggregate quantitative information on remuneration, per field of activity

Consolidated remuneration within the Bank (Gross RON):	Average no of beneficiaries	01.01.2025 - 31.12. 2025
Vista Bank (Romania) SA	500.12	105.228.434

15.2.7 Aggregated quantitative information on remuneration to the members of the management and members of staff whose actions have a significant impact on the risk profile of the institution

Vista Bank (Romania) SA (Gross RON):	No of beneficiaries	01.01.2025 -31.12. 2025
Fix remuneration - members of the executive management function (Management Committee))	4	3.356.592
Variable remuneration - members of the executive management function (Management Committee)	4	684.653
Fix remuneration – members of the supervisory function (Board of Administrators)	5	756.015
Variable remuneration – members of the supervisory function (Board of Administrators)	0	0
Fix remuneration - members of the staff with significant impact (except for the executive management function)	13	5.373.694



Variable remuneration - members of the staff with significant impact	11	745.588
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The deferred, due and unpaid remuneration was not granted within the Bank in 2025.

The deferred remuneration paid and lowered expanded via performance adjustments it was not granted within the Bank in 2025.

15.2.8 Number of employees who received a remuneration of EUR 1 million or more per financial year

The Bank had no employees during the financial year 2025 to benefit from a remuneration of EUR 1 million or more per financial year, broken down by salary foresee of EUR 500,000 for remuneration between EUR 1 million and EUR 5 million and foresee salary EUR 1 million for remuneration greater than or equal to EUR 5 million.

The Statement of VISTA Bank (Romania) SA Management regarding the risk profile of the Bank in 2025

Developing a solid culture regarding risk management represents one of the main strategic objectives of VISTA Bank (Romania) SA, this being promoted at the level of each line of activity having responsibilities related to risk management and risk control, as well as at the level of operational structures and each person within the institution.

Risk management includes determining, for all activities conducted by the Bank, of the **risk appetite**, ensuring business continuity conditions are sound and prudent. The sizing target risk profile is made annually, considering market conditions and macroeconomic, past performance (historical) and Bank's strategy timeframe immediately following (12 months).

In 2025, Vista Bank (Romania) SA assumed the following levels of risk:

Risk category	Profile as of 31.12.2025	Target Profile 2025
A: CAPITAL RELATED RISKS		
CREDIT RISK	Medium	Medium
RESIDUAL RISK	Medium	Medium
CREDIT CONCENTRATION RISK	Medium	Medium
FX LENDING RISK	Low	Low to medium
MARKET RISK (FX ALL BOOKS)	Low	Medium
IRRBB	Medium	Medium
OPERATIONAL RISK	Low	Low to medium
COMPLIANCE RISK	Low to medium	Medium
REPUTATIONAL RISK	Low to medium	Low to medium
SETTLEMENT RISK	Low	Low
SECURITY RISK	Low	Medium
STRATEGIC&BUSINESS RISK	Low	Low to medium
TOTAL SCORE FOR CAPITAL RELATED RISKS	LOW TO MEDIUM	MEDIUM
B: LIQUIDITY RELATED RISKS		
LIQUIDITY RISK	Low to medium	Medium



C: EXCESSIVE LEVERAGE RISK		
EXCESSIVE LEVERAGE RISK	Low	Low to medium
AVERAGE RISK APPETITE SCORE*	LOW TO MEDIUM	MEDIUM

* as average score of capital related risks, liquidity risk and excessive leverage risk scores

Risk category	Profile as of 31.12.2025	Target Profile 2025
TOTAL CAPITAL ADEQUACY RATIO (CAR)	19.68%	17.50% <= CAR
LIQUIDITY COVERAGE RATIO (LCR)	189.34%	130% <= LCR
LEVERAGE RATIO	8.13%	5% <= LEVERAGE

In order to fulfil the strategic objectives regarding the risk appetite of the Bank, its levels have been transposed into a wide set of operational limits for general and specific risk management indicators. The credit risk identification occurs when new borrowing transactions are initiated or during the existing transaction. The Bank identifies credit risk derived from counterparty quality and from its credit products. In this respect, there were established limits for the distribution of the credit portfolio by geographical areas, sectors of activity, duration, product types, type of residence, currency, financial performance, beneficial owner, collateral type. The general and specific indicators established were permanently monitored during 2025, the Bank being within the risk appetite assumed.

We mention the following key indicators:

Template EU KM1 - Key metrics template



		31.12.2025	30.09.2025	30.06.2025	31.03.2025	31.12.2024
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	780,527,490	753,626,914	733,386,221	697,965,358	696,791,139
2	Tier 1 capital	907,989,990	804,437,914	733,386,221	697,965,358	696,791,139
3	Total capital	1,017,159,509	915,382,034	846,606,155	815,926,954	818,100,743
Risk-weighted exposure amounts						
4	Total risk exposure amount	5,167,602,001	5,006,145,101	4,722,906,618	4,533,199,883	4,513,310,705
4a	Total risk exposure pre-floor	5,167,602,001	5,006,145,101	4,722,906,618	4,533,199,883	4,513,310,705
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	15.10%	15.05%	15.53%	15.40%	15.44%
5a	Not applicable					
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	15.10%	15.05%	15.53%	15.40%	15.44%
6	Tier 1 ratio (%)	17.57%	16.07%	15.53%	15.40%	15.44%
6a	Not applicable					
6b	Tier 1 ratio considering unfloored TREA (%)	17.57%	16.07%	15.53%	15.40%	15.44%
7	Total capital ratio (%)	19.68%	18.29%	17.93%	18.00%	18.13%
7a	Not applicable					
7b	Total capital ratio considering unfloored TREA (%)	19.68%	18.29%	17.93%	18.00%	18.13%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	4.4200%	4.31%	4.0600%	4.0600%	4.0600%
EU 7e	of which: to be made up of CET1 capital (percentage points)	2.49%	2.42%	2.2800%	2.2800%	2.2800%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	3.3100%	3.23%	3.0500%	3.0500%	3.0500%
EU 7g	Total SREP own funds requirements (%)	12.42%	12.31%	12.06%	12.06%	12.06%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	0.86%	0.92%	0.89%	0.88%	0.84%
EU 9a	Systemic risk buffer (%)	1.00%	1.00%	1.00%	1.00%	1.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
11	Combined buffer requirement (%)	4.36%	4.42%	4.39%	4.38%	4.34%
EU 11a	Overall capital requirements (%)	16.78%	16.73%	16.45%	16.44%	16.40%
12	CET1 available after meeting the total SREP own funds requirements (%)	10.60%	8.13%	8.75%	8.62%	8.66%
Leverage ratio						
13	Total exposure measure	11,165,691,322	10,556,996,627	9,597,693,290	9,477,903,887	9,347,509,027
14	Leverage ratio (%)	8.13%	7.62%	7.64%	7.36%	7.45%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0%	0%	0%	0%	0%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0%	0%	0%	0%	0%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	2,240,462,954	2,312,413,940	2,198,264,998	2,351,122,986	2,044,709,349
EU 16a	Cash outflows - Total weighted value	3,321,630,968	2,812,830,406	2,536,401,280	2,512,118,326	2,480,863,883
EU 16b	Cash inflows - Total weighted value	2,138,348,894	1,444,047,243	937,906,860	1,036,059,207	1,051,346,762
16	Total net cash outflows (adjusted value)	1,183,282,074	1,368,783,163	1,598,494,420	1,476,059,119	1,429,517,121
17	Liquidity coverage ratio (%)	189.34%	168.94%	137.52%	159.28%	143.03%
Net Stable Funding Ratio						
18	Total available stable funding	6,814,704,740.80	6,347,912,685.25	5,977,411,873.80	5,868,457,829.35	5,836,323,120.45
19	Total required stable funding	4,322,467,703.11	4,141,499,629.16	3,932,062,315.34	3,554,662,895.25	3,630,118,888.75
20	NSFR ratio (%)	157.66%	153.28%	152.02%	165.09%	160.77%





The Statement of Vista Bank (Romania) S.A. Management regarding the adequacy of the risk management framework in 2025

In compliance with the NBR Regulation no. 5/20.12.2013 regarding prudential requirements for credit institutions with the further modifications, and, more specific, with regards to the requirements stipulated by article 435, lit e.) from the Regulation no. 575/2013 of the European Parliament and Council dated 26.06.2013, regarding prudential requirements for credit institutions and investment companies, with the subsequent modifications, through the present statement, the Management of Vista Bank (Romania) SA certifies that the existing systems for risk management are adequate taking into consideration the risk profile and the strategy of the institution.

The risk management framework is one of the basic components of the management framework for the Bank, being adapted to the structure of the institution, activity, and the nature and complexity of the risks inherent in the business model. This ensures the effective and prudential management of the Bank, inclusively segregation of duties within the organization, prevention of conflict of interests and, in the same time, follow up the strategic objectives of risk to be placed in the target risk profile of the bank.



Statement of the Management of Vista Bank (Romania) S.A. on measures taken to ensure adequate and effective corporate governance in 2025

In accordance with the requirements of Regulation no. 575/2013 of the European Parliament and Council of 26.06.2013, as amended by Regulation no. 876/2019 of the European Parliament and of the Council of 20.05.2019, regarding the prudential requirements for credit institutions and investment companies, with subsequent amendments and completions, by this declaration, the Management Structure of Vista Bank (Romania) S.A. guarantees that the Bank constantly analyzes its activity in the field of corporate governance, adopting adequate and efficient measures.

In this regard, Vista Bank (Romania) S.A. has developed and permanently updated an internal corporate governance system in order to pursue the interests of all stakeholders: shareholders, employees, suppliers, administrators, customers, etc., being a mechanism for monitoring the actions, policies and decisions of the Bank.

Template EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

	a	b	c	d	e	f	g
	Carrying values as reported in published financial statements	Carrying values under the scope of regulatory consolidation	Carrying values of items				
Subject to the credit risk framework			Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework		
Assets							
Cash and balances with central banks	2,142,381,934.00	2,142,381,934.00	2,142,381,934.00	-	-	-	-
Loans and advances to banks at amortised cost	800,210,088.00	800,210,088.00	800,210,088.00	-	-	-	-
Loans and advances to customers at amortised cost	5,458,565,420.00	5,458,565,420.00	5,458,565,420.00	-	-	-	-
Financial instruments at amortised cost	1,763,599,597.00	1,763,599,597.00	1,763,599,597.00	-	-	-	-
Financial assets at fair value through other comprehensive income	11,511,096.00	11,511,096.00	11,511,096.00	-	-	-	-
Financial assets mandatory measured at fair value through profit or loss	2,488,246.00	2,488,246.00	2,488,246.00	-	-	-	-
Financial assets held for trading, out of which:	13,150,235.00	13,150,235.00	-	13,150,235.00	-	-	-
Derivative financial instruments	13,150,235.00	13,150,235.00	-	13,150,235.00	-	-	-
Debt securities	-	-	-	-	-	-	-
Repossessed assets (inventories)	22,109,084.00	22,109,084.00	22,109,084.00	-	-	-	-
Other financial assets	20,964,728.00	20,964,728.00	20,964,728.00	-	-	-	-
Other assets	15,768,809.00	15,768,809.00	15,768,809.00	-	-	-	-
Investment properties	86,773,002.00	86,773,002.00	86,773,002.00	-	-	-	-
Investments in subsidiaries	3,415,995.00	3,415,995.00	3,415,995.00	-	-	-	-
Current tax receivables	146,272.00	146,272.00	146,272.00	-	-	-	-
Property and equipment	45,966,064.00	45,966,064.00	45,966,064.00	-	-	-	-
Right-of-use assets	57,070,971.00	57,070,971.00	57,070,971.00	-	-	-	-
Intangible assets	22,793,474.00	22,793,474.00	-	-	-	-	22,793,474.00
Deferred tax assets	40,200.00	40,200.00	-	-	-	-	40,200.00
Total assets	10,466,955,215.00	10,466,955,215.00	10,430,971,306.00	13,150,235.00	-	-	22,833,674.00
Liabilities							
Deposits from banks	11,203,010.00	11,203,010.00	-	-	-	-	11,203,010.00
Deposits from customers	9,267,943,279.00	9,267,943,279.00	-	-	-	-	9,267,943,279.00
Other financial liabilities	39,653,813.00	39,653,813.00	-	-	-	-	39,653,813.00
Other liabilities	26,595,288.00	26,595,288.00	-	-	-	-	26,595,288.00
Lease liabilities	61,737,953.00	61,737,953.00	-	-	-	-	61,737,953.00
Subordinated loans	115,710,580.00	115,710,580.00	-	-	-	-	115,710,580.00
Bonds issued	128,168,114.00	128,168,114.00	-	-	-	-	128,168,114.00
Other provisions	7,421,667.00	7,421,667.00	-	-	-	-	7,421,667.00
Deffered tax liabilities	2,916,576.00	2,916,576.00	-	-	-	-	2,916,576.00
Total liabilities	9,661,350,280.00	9,661,350,280.00	-	-	-	-	9,661,350,280.00

Template EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements

		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	10,466,955,215	10,430,971,306		13,150,235	
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	9,661,350,280				
3	Total net amount under the scope of prudential consolidation	805,604,935	10,430,971,306	-	13,150,235	-
4	Off-balance-sheet amounts	1,836,162,766	1,836,162,766			
5	Differences in valuations					
6	Differences due to different netting rules, other than those already included in row 2					
7	Differences due to consideration of provisions					
8	Differences due to the use of credit risk mitigation techniques (CRMs)					
9	Differences due to credit conversion factors					
10	Differences due to Securitisation with risk transfer					
11	Other differences					
12	Exposure amounts considered for regulatory purposes	12,303,117,981	12,267,134,072	-	13,150,235	

Template EU AE1 - Encumbered and unencumbered assets

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
		010	of which notionally eligible EHQLA and HQLA	040	of which notionally eligible EHQLA and HQLA	060	of which EHQLA and HQLA	090	of which EHQLA and HQLA
			030		050		080		100
010	Assets of the reporting institution	-	-			9,403,210,044	1,772,977,881		
030	Equity instruments	-	-	-	-	4,715,867	-	4,621,058	-
040	Debt securities	-	-	-	-	1,776,973,620	1,776,973,620	1,799,049,337	1,799,049,337
050	of which: covered bonds	-	-	-	-	-	-	-	-
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	-	-	-	-	1,776,973,620	1,776,973,620	1,799,049,337	1,799,049,337
080	of which: issued by financial corporations	-	-	-	-	-	-	-	-
090	of which: issued by non-financial corporations	-	-	-	-	-	-	-	-
120	Other assets	-	-			7,621,520,557	-		