

The logo for ROMGAZ is displayed in a bold, blue, sans-serif font. The text is centered horizontally and partially overlaid by a decorative graphic of overlapping, translucent green shapes that resemble stylized waves or leaves. The background is white.

# ROMGAZ

**Consolidated Sustainability Statement 2024**

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# 1 ESRS 2 - General Disclosures

## 1.1 Basis for preparation

### 1.1.1 BP-1: General basis for preparation of sustainability statements

**ROMGAZ** Group consisting of Societatea Națională de Gaze Naturale "Romgaz" S.A. as the parent company and its wholly owned subsidiaries:

- S.N.G.N. ROMGAZ S.A. - Filiala de Îmagazinare Gaze Naturale Depogaz Ploiești S.R.L. ("Depogaz"), headquartered at 184 Ghe. Grigore Cantacuzino Street, Ploiești, 100492, Prahova County, Romania;
- ROMGAZ Black Sea Limited (RBS), a company operating under the laws of the Commonwealth of the Bahamas and conducting business through its Romanian branch, ROMGAZ Black Sea Limited Nassau (Bahamas), Bucharest Branch,

Presents the Consolidated sustainability report which was prepared in accordance with Section 7<sup>1</sup>.3 of MFO no. 2844/2016, which approves the accounting regulations in accordance with International Financial Reporting Standards, with subsequent amendments and completions. These regulations implement Article 29(a) of EU Directive 2013/34 and the European Sustainability Reporting Standards (ESRS), as provided in Annex 1 to Delegated Regulation (EU) 2023/2772 of July 31, 2023, which supplements European Parliament and Council Directive 2013/34/EU, being transposed into local legislation by OMF no. 85/2024. Additionally, the report includes the information required by Article 8 of the EU Taxonomy Regulation 2020/852."

The National Natural Gas Company "Romgaz" S.A. (hereinafter referred to as "Romgaz") is a Romanian legal entity, organized as a joint-stock company, operating in accordance with Romanian laws and the Company's Articles of Incorporation.

Romgaz includes eight branches, established based on both the specific nature of their activities and territorial distribution (natural gas production branches), as follows:

1. Mediaș Branch, headquartered in Mediaș, 5 Gării Street, postal code 551025, Sibiu County, territorially organized into 8 divisions;
2. Târgu Mureș Branch, headquartered in Târgu Mureș, 23 Salcânilor Street, postal code 540202, Mureș County, territorially organized into 9 divisions;
3. Mediaș Well Intervention, Overhaul, and Special Well Operations Branch (SIRCOSS), headquartered in Mediaș, 5 Șoseaua Sibiului Street, postal code 551009, Sibiu County, territorially organized into 3 divisions and 5 workshops;
4. Târgu Mureș Technological Transport and Maintenance Branch (STTM), headquartered in Târgu Mureș, 6 Barajului Street, postal code 540101, Mureș County, territorially organized into 5 divisions and a laboratory;
5. Iernut Electric Power Production Branch (SPEE), headquartered in Iernut, 1 Energeticii Street, postal code 545100, Mureș County, organized into 7 divisions;
6. Drobeta-Turnu Severin Branch, headquartered in Drobeta-Turnu Severin, 27 Aurelian Street, Mehedinți County;
7. Buzău Branch, headquartered in Buzău, 1 Romaniței Street, postal code 120032, Buzău County;
8. Chișinău Branch, headquartered at MD-2012, 70 Mihai Eminescu Street, 2nd floor, Chișinău, Republic of Moldova.

Throughout this Consolidated Sustainability Statement, we will refer to "ROMGAZ Group" when addressing all three subsidiaries and eight branches that are part of the group. Where necessary, we will specifically mention Romgaz, Depogaz, and RBS when presenting various information applicable to each company individually.

The ROMGAZ Group Consolidated Sustainability Statement has been prepared on a consolidated basis, covering the reporting period from January 1 to December 31, 2024, aligned with the financial reporting period.

The consolidation perimeter of the Consolidated Sustainability Statement is the same as that of ROMGAZ Group's consolidated financial statements.

There are no ROMGAZ Group subsidiaries exempted from individual or consolidated sustainability reporting.

The Consolidated Sustainability Statement covers ROMGAZ Group's own operations as well as relevant value chain information, both upstream and downstream. The double materiality assessment included the evaluation of impacts, risks, and opportunities associated with ROMGAZ Group's operations, products, and services, as well as the group's business relationships.

For the 2024 financial year:

- The assessment of impacts, risks, and opportunities was conducted considering both ROMGAZ Group's own operations and its significant value chain.
- Sustainability policies, actions, and targets cover ROMGAZ Group's own operations.

ROMGAZ Group did not apply the exemption for disclosing information on imminent developments or ongoing negotiations, as provided under Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

ROMGAZ Group did not exercise the option to omit any information related to intellectual property, know-how, or innovation results.

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

By Resolution No. 32/2024, the Board of Directors of ROMGAZ Group approved the establishment of a natural gas supply branch in the Republic of Moldova. Based on this resolution, "Societatea Națională de Gaze Naturale Romgaz S.A. Mediaș - Chișinău Branch" was registered with the Public Services Agency of the Republic of Moldova in the State Register of Legal Entities but did not conduct any activity in 2024. Therefore, no information regarding this entity is presented in this Consolidated Sustainability Statement.

RBS is a company operating under the laws of The Commonwealth of The Bahamas, registered under No. 154020B, acting through its Romanian branch, Romgaz Black Sea Limited Nassau (Bahamas) - Bucharest Branch ("RBS"), headquartered in Bucharest, District 1, 169A Calea Floreasca, Building B, Rooms 801-834, 801A, 803A, 803B, 832A, 8th Floor. Romgaz became the sole shareholder/associate of RBS in August 2022, upon the completion of the acquisition of shares issued by ExxonMobil Exploration and Production Romania Limited (the former name of Romgaz Black Sea Limited).

RBS is a co-titleholder of the Concession Agreement for Petroleum Exploration, Development, and Production in Block XIX Neptun, approved by Romanian Government Decision No. 1233/2000, with subsequent amendments and completions ("Petroleum Agreement"). RBS and OMV Petrom S.A. (OMV Petrom) are the titleholders of the Petroleum Agreement, each holding 50% of the acquired rights and assumed obligations under the agreement for the eastern, deepwater area of the Neptun Block ("Neptun Deep"). As of August 1, 2022, OMV Petrom has also assumed the role of operator of the block, in accordance with Article 47, letter l) of Law No. 238/2004, with all subsequent amendments and completions. The Joint Operating Agreement (JOA) is the contract that regulates the relationship between the non-operator (RBS) and the operator (OMV Petrom) in the Neptun Deep project.

Neptun Deep is the sole asset of RBS. The company does not own any other assets or interests and is not a party to any joint operating agreement, exploitation agreement, production-sharing agreement, or similar agreement, except for the Concession Agreement for Petroleum Exploration, Development, and Production in Block XIX Neptun, deepwater zone of the Black Sea ("Neptun Deep").

The Neptun Deep project is the largest natural gas project in the Romanian sector of the Black Sea and Romania's first deepwater offshore project. Neptun Deep aims to exploit the natural gas reserves discovered in the Black Sea by developing two confirmed gas fields (Domino and Pelican South), with commercial production expected to begin in 2027.

For the reporting year, RBS only conducted office activities, and the information presented in this Consolidated Sustainability Statement reflects this aspect.

The Neptun Deep project aligns with Romania's trajectory toward achieving climate neutrality by 2050.

For the preparation of the Consolidated Sustainability Statement, ROMGAZ Group has applied short, medium, and long-term time horizons, as defined in ESRS 1 section 6.4, as follows: the short-term horizon is considered the reporting year, the medium-term horizon extends up to five years, the long-term horizon covers more than five years.

Regarding the sources used for estimates and the uncertainty of results, ROMGAZ Group acknowledges the uncertainties associated with forward-looking information and the fact that such information may be subject to changes. Where applicable, the assumptions and reasoning used for measuring estimates have been clearly defined, ensuring transparency and clarity in reporting quantitative indicators and monetary values.

For the presentation of targets and environmental indicators included in: ESRS E1 - Climate Change, ESRS E2 - Pollution, ESRS E3 - Water and Marine Resources, and ESRS E5 - Circular Economy, the methodologies prescribed by applicable national legislation have been used.

For reporting greenhouse gas (GHG) emissions data, all assumptions, approximations, and reasoning applied where direct data was not available are detailed in ESRS E1 - Climate Change and are aligned with the GHG Protocol methodology.

Starting from the 2024 reporting period, the ROMGAZ Group Consolidated Sustainability Statement has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).

No comparative data is presented, as 2024 is considered the first reporting year.

ROMGAZ Group integrates information on other industry-specific standards into the Consolidated Sustainability Statement, particularly through the implementation and maintenance of ISO certifications.

The ROMGAZ Group Integrated Management System is aligned with ISO 9000 standards and covers all ROMGAZ Group's operations, except for RBS through its applicable corporate governance.

A health and safety management system is implemented in the company, in accordance with ISO 45001:2023, covering all ROMGAZ Group units (with the exception of RBS through its applicable corporate governance).

The environmental management system is certified under ISO 14001:2015 requirements for all operations (except RBS, through its applicable corporate governance).

The management systems are internally audited annually and externally audited in compliance with certification requirements.

The ISO certifications of Romgaz are publicly available on the company's website at [The Integrated Management System | Romgaz](#), while those of Depogaz can be accessed at [Sistemul de Management Integrat: DEPOGAZ](#).

ROMGAZ Group is assessing the opportunity to implement the ISO 50001:2019 standard for efficient energy management.

The Consolidated Sustainability Statement includes only the information required by ESRS, without integrating indicators from other reporting standards.

When preparing the Consolidated Sustainability Statement, no references were made to the Administrators' Report.

## 1.2 Governance

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

[The company is organized](#) in a hierarchical-functional structure, with six levels, starting from the company's shareholders and extending down to the execution staff, as follows:

- General Meeting of Shareholders;
- Board of Directors;
- General Director (with mandate), Deputy General Director (with mandate), Financial Director (with mandate);
- Directors without a mandate contract;
- Heads of organizational units subordinate to the Directors;
- Execution staff.



## General Meeting of Shareholders

The General Meeting of Shareholders (GMS) or the Sole Shareholder, in the case of subsidiaries, is the governing body of the company that makes decisions regarding the activity and economic policies in accordance with the applicable legal provisions.

The GMS or the Sole Shareholder appoints the Board of Directors (BoD), which is responsible for strategic supervision and guidance, including the development of policies aimed at professional conduct.

## Board of Directors

As of December 31, 2024, Romgaz Group is managed in a unitary system by a Board of Directors consisting of 7 administrators/members (6 non-executive members and 1 executive member) with economic and legal education, appointed by the General Meeting of Shareholders for a four-year term starting from March 16, 2023. Four members of the Board of Directors are independent, representing 57% of the Board's composition. Regarding gender diversity, the Board includes one female member, which indicates a 14% representation of women.

### Members of the ROMGAZ Group Board of Directors as of December 31, 2024:

Name	Executive/ Non-Executive	Independent	Gender	Function in BoD
Dan Dragoș DRĂGAN	Non-executive	No	Male	President
Aristotle Marius JUDE	Executive	No	Male	Member
Marius-Gabriel NUT	Non-executive	Yes	Male	Member
Razvan Brasla	Non-executive	Yes	Male	Member
Gheorghe Silvian Sorici	Non-executive	Yes	Male	Member
Botond BALAZS	Non-executive	No	Male	Member
Elena-Lorraine STOYAN	Non-executive	Yes	Female	Member

The Board of Directors (BoD) acts in the interest of ROMGAZ Group to achieve the organizational goals and is legally responsible for complying with the law and internal regulations, ethical and moral rules, as well as specific standards, including those related to sustainability. Although the BoD delegates some of its responsibilities to the executive directors, it remains accountable for the implementation of the approved "Management Plan" and the decisions of the GMS, which also cover sustainability topics.

The members of the Board of Directors are selected based on their competencies and diverse experience. They contribute to the variety of skills needed to manage the impacts, risks, and opportunities assessed at the company level, including those related to sustainability, and possess a diverse set of capabilities relevant to the Romanian and regional energy sector.

The current structure brings together professionals with expertise in relevant areas such as business administration, investments, and sustainability, ensuring efficient governance aligned with the company's strategic objectives.

According to Article 8.6 of the mandate contracts, "The members of the Board of Directors are required to participate annually in a professional training program lasting a minimum of one week, which includes training sessions in corporate governance, legal matters, and other relevant areas for the company's activity".

Specifically, in 2024, the members of the Board of Directors participated in five training sessions, with durations ranging from 8 to 56 hours. These sessions addressed topics such as ESG concepts and sustainability, promoting best business practices, and strengthening a strong corporate governance culture, as well as the dynamics of the relationship between the Board of Directors and the Directors. In total, the seven members of the Board accumulated 280 hours of training.

Regarding the relevant experience for the company's sector of activity:

- Mr. Dan Dragoș Drăgan, non-executive member and Chairman of the Board of Directors of ROMGAZ Group since March 2021, has managerial experience and leadership skills, gained through leadership positions held in various companies starting from 1996.



- Mr. Aristotel Marius Jude, member of the Board of Directors of ROMGAZ Group since 2019 (executive director since February 2021), has a rich experience in enterprise management, business administration, regulations in the energy sector, joint operating agreements and/or cooperation in the natural gas sector, project management, business strategy and planning and legal advice, experience gained during professional activities in the energy sector, within the various management positions held at ROMGAZ Group and at the Ministry of Energy. He currently holds the position of Deputy General Manager of Romgaz.
- Mr. Marius-Gabriel Nuț, non-executive member of the Board of Directors of ROMGAZ Group since 2022, possesses managerial experience and leadership competencies, acquired by holding leadership positions in various companies starting in 2016. Mr. Nuț expanded his knowledge in the ESG field by participating in the course "Sustainability as Core Value: Implications for Boards and Enterprise Leaders" organized in May 2024.
- Mr. Răzvan Braslă, non-executive member of the Board of Directors of ROMGAZ Group since 2023, has experience in company management, having held leadership positions, including General Director, in various organizations since 2015. He has worked in a diverse range of sectors, including: project management for civil and commercial construction, development of public interest commercial and logistics projects, civil construction development, and consulting in the construction and real estate development fields. Mr. Braslă expanded his knowledge in the ESG field by participating in the course "Sustainability as Core Value: Implications for Boards and Enterprise Leaders", organized in May 2024.
- Mr. Gheorghe Silvian Sorici, non-executive member of the Board of Directors of ROMGAZ Group since 2021, is an economist and has experience in company leadership and coordination, acquired through the positions held throughout his career, starting from 1997.
- Mr. Balázs Botond, non-executive member of the Board of Directors of ROMGAZ Group since 2019, has experience in management and law. He is an associate professor at Babeș-Bolyai University, teaching in the field of non-profit organizations and project management. He has held various leadership positions, including Head of the Legal Department at ROMGAZ Group, and has contributed to major projects in the energy sector. He holds a law degree, two master's degrees in public management and private law, and is a PhD candidate in engineering and management.
- Ms. Elena Lorena Stoian is a non-executive member of the Board of Directors since 2023, a lawyer with over 22 years of professional experience, coordinating teams and working with clients from various sectors, including companies, public and private institutions, banks, and non-banking financial institutions. She is the founding lawyer of SCA Stoian și Asociații and also a practitioner in insolvency.

In its activities, the Board of Directors is supported by four advisory committees:

- Audit Committee;
- Risk Management Committee;
- Nomination and Remuneration Committee;
- Strategy Committee.

The criteria considered when establishing the composition of the Committees are outlined in the internal regulations published on the Company website in the Internal [Regulations of the Board of Directors section](#).

**The Audit Committee** fulfils the legal duties outlined in Article 65 of Law No. 162/2017, primarily involving the monitoring of the financial reporting process, internal control systems, internal audit, and risk management systems within the company, as well as overseeing the statutory audit of the annual financial statements and managing the relationship with the external auditor. Regarding compliance activities, ethical conduct, and conflicts of interest, the Audit Committee ensures:

- Compliance with local and international laws and regulations;
- Adoption and implementation of a Code of Ethics and Professional Conduct and a Policy on Conflicts of Interest;
- Analysis of reports on compliance with conduct standards and offering advice on ethical matters;
- Reviewing the declarations of independence of directors and evaluating conflicts of interest.

The **Risk Management Committee** is established to analyse, monitor, and evaluate the internal control system and risk management, as well as the company's practices and performance in fulfilling its ESG obligations. The responsibilities of the Committee are outlined in its [Internal Regulation](#).

Specifically, for the sustainability/ESG area, the Committee:

- Assists the Board of Directors in defining the company's strategy regarding ESG issues by understanding how the company can create value considering ESG drivers;
- Monitors risk management in sustainability matters, focusing on ESG aspects, industry developments, and the implementation of effective crisis management policies;
- Monitors sustainability reporting and related processes within the company to identify information reported in compliance with relevant sustainability reporting standards;
- Monitors external ESG trends, understands associated risks and opportunities, and the expectations of the company's key stakeholders in this regard;
- Monitors the company's impact on the natural environment and its adaptation to climate change;
- Monitors the company's interactions with employees, shareholders, and communities where it operates, including workplace policies and any social or community projects undertaken by the company;
- Reports to the Board any ESG aspects that could affect the company's business, operations, performance, or public image, or are otherwise relevant to the company and its shareholders;
- Monitors actions or initiatives taken to prevent, mitigate, and manage ESG-related risks that could have a significant negative impact on the company or are otherwise relevant to shareholders and provides guidance in this regard;
- Analyzes risks and opportunities related to social, environmental, and economic impacts, measured from the perspective of stakeholders;
- Examines risk assessment and mitigation plans and informs the Board accordingly.

The Risk Management Committee plays a crucial role in setting and monitoring ESG targets. It analyzes risk mitigation plans and measures progress towards achieving the established ESG objectives, ensuring alignment with the European Sustainability Reporting Standards (ESRS). Progress is tracked through reports and reviewed during the committee's quarterly meetings.

The existence of the **Nomination and Remuneration Committee** is provided for by current legislation (Law no. 31/1990, Article 140<sup>2</sup>, and Emergency Ordinance no. 109/2011, Article 34) and is also a requirement for companies listed on the Bucharest Stock Exchange (BVB), as is the case for ROMGAZ Group. The Nomination and Remuneration Committee has the following main objectives:

- Establishing procedures for selecting candidates for the positions of directors and administrators;
- Formulating proposals for board member positions;
- Being involved in the selection and recruitment process for directors, including making proposals regarding their remuneration.

The **Strategy Committee** assists the Board of Directors in fulfilling its responsibilities regarding the development and updating of the company's overall strategy.

The responsibilities and competences of each committee are outlined in the internal regulations of the committees, which are available on [Company's](#) website.

As of December 31, 2024, all members of the Audit Committee, Risk Management Committee, and Nomination and Remuneration Committee were male. The Strategy Committee includes one female member, representing 20% of the total membership.

Throughout 2024, the ESG responsibilities at ROMGAZ Group were assigned to the Risk Management Committee.

In December 2024, Law no. 162/2017 was amended, introducing sustainability-related responsibilities for the Audit Committee under Article 65. As a result, the Internal Regulations of the ROMGAZ Group Audit Committee will be reviewed in 2025 to align with the new legislative requirements.

These will also include the competencies established for the Audit Committee under the Corporate Governance Code, which will be revised starting January 1, 2025.

Additionally, the administrative management of Depogaz is provided by a Board of Directors consisting of five independent members, while for RBS, it is overseen by a Board of Directors consisting of three members.

#### Members of the Depogaz Board of Directors as of December 31, 2024:

Name	Executive/ Non-Executive	Independent	Gender	Function in BoD
Nicolae Bogdan Codruț Stanescu	Non-executive	Yes	Male	President
Ileana Târîndă	Non-executive	Yes	Female	Member State
George Lazar	Non-executive	Yes	Male	Member State
Anna-Maria Vasile	Non-executive	Yes	Female	Member State
Anca Isabela Ciornea	Non-executive	Yes	Female	Member State

As of December 31, 2024, two members of the Depogaz Board of Directors were male (40%) and three were female (60%).

At Depogaz, there are the same committees supporting the activity of the Board of Directors as at Romgaz. The committees have the same roles.

#### Members of the RBS Board of Directors as of December 31, 2024:

Name	Executive/ Non-Executive	Independent	Gender	Function in BoD
Rodica Sasu	Non-executive	Yes	Female	President
Robert Stelian Chirca	Non-executive	Yes	Male	Vice-President
Andrei Tiberiu Novac	Non-executive	Yes	Male	Vice-President

On December 31, 2024 two members of the RBS Board of Directors were male (66%) and one was female (33%).

The management of RBS is carried out in accordance with its Articles of Association and Articles of Association in force. There are no such committees at RBS level.

#### Directors

The Board of Directors of Romgaz has delegated the leadership of the company to 3 directors: the General Director, the Deputy General Director, and the Financial Director. The boards of directors of the subsidiaries have delegated the management of these entities to a general director.

The General Director, the Deputy General Director, the Financial Director, as well as the directors without a mandate contract, are key individuals in the company's structure and operation. In line with the previously described six-level hierarchical structure, the heads of departments (subsidiaries, departments, directorates, offices, etc.), who act as a link between the higher management structure of the company and the employees in their respective compartments, report directly to them.

The competencies delegated to the directors appointed by the Board of Directors of Romgaz, namely the General Director, the Deputy General Director, and the Financial Director, were established by a decision of the Board of Directors.

Starting from May 16, 2023, following the appointment of the General Director for a 4-year mandate, the duties delegated to the General Director, through Board Decision no. 55 / May 15, 2023, for the sustainability area, are:

- To exercise all leadership competencies of Romgaz, except for competencies that have not been delegated to directors, as well as except for competencies delegated to the Financial Director and Deputy General Director. The General Director is responsible for maintaining the Integrated Management System.
- As the General Director, he also holds the position of legal representative of ROMGAZ Group, according to Article 143<sup>2</sup>, paragraph (4) of the Companies Law no. 31/1990.

The duties delegated to the Deputy General Director, through Article 6 of the Board Decision no. 55 from May 15, 2023, which are related to sustainability, include:

- Exercising leadership competencies for the Directorate of Strategy, International Relations, European Funds, Directorate of Regulations, Directorate of Energy Marketing, Directorate of Quality, Environment, Emergency Situations, and Critical Infrastructure, Directorate of Information Technology, Investment Projects Management Service, Project Management Office, and the Inventory Service;
- Coordinating activities carried out at the Romgaz level related to the Neptun Deep project, except for those related to securing financing for Romgaz's share of the project;
- Planning, approving, and coordinating the operations necessary and useful for achieving Romgaz's business objectives that, according to the law and Romgaz's organizational and operational regulations, fall under the competencies of the aforementioned organizational units.

The duties delegated to the Economic Director, through Article 5 of Board Decision no. 55 from May 15, 2023, involve monitoring and ensuring the fulfilment of the economic provisions/indicators specified in the approved revenue and expenditure budget. The Financial Director presents the budget execution to the Board of Directors and provides information regarding the company's economic-financial situation, the progress of investments (including sustainability-related investments), the progress of adopted measures, and the implementation status of actions ordered by the Board of Directors concerning economic-financial activity, along with any other documents and information requested, as well as measures taken in case of non-compliance with these.

The General Director, Deputy General Director, and Financial Director play a significant role in the implementation of Romgaz's overall business strategy, including sustainability aspects. Their competencies include strategic skills and operational abilities aimed at achieving the environmental, social, and governance objectives included in the mandate contract.

Mr. Răzvan Popescu, General Director of Romgaz, has relevant leadership experience. He began his career in 2007 and worked for 9 years at the National Bank of Romania, where he held the position of Portfolio Manager, responsible for managing the international foreign exchange reserves.

Mr. Aristotel Marius Jude, Deputy General Manager (and member of the Board of Directors of ROMGAZ Group), began his professional career in 2002, at Romgaz. He has a rich experience in enterprise management, business administration, regulations in the energy sector, joint operating agreements and/or cooperation in the natural gas sector, project management, business strategy and planning and legal advice, experience gained during his professional activities in the energy sector, in various management positions held at ROMGAZ Group and in that of Secretary of State at the Ministry of Energy.

Mrs. Gabriela Trâmbițaș, Financial Director, has extensive experience in the economic-financial field. She started her career in financial auditing and then joined Romgaz, where she has worked for 10 years, contributing to the management and supervision of financial processes. Throughout her career, she has been involved in various development projects, including the acquisition of Exxon's stake in the Neptun Deep perimeter in the Black Sea and securing the necessary financing for this transaction.

[The complete CVs](#) of the management team can be consulted on the company's website.

The composition of the executive team as of 31 December 2024:

Name of member	Gender	Role
Razvan Popescu	Male	General Director
Aristotle Marius JUDE	Male	Deputy General Director
Gabriela LAZAȘ	Female	Financial Director

As of 31 December 2024, two directors were male (66%) and one was female (33%).

The Depogaz management is ensured by Mr. Vasile Cârstea (male), while the management of RBS is led by Mrs. Diana Andreea Lupu (female).

According to the Organization and Operation Regulation, under the supervision of the General Director of Romgaz, there is the Sustainability Standard - ESG Office, which handles the management and preparation of the necessary formalities for adopting ESG reporting standards, and the Reporting Service, which manages and carries out the necessary formalities for the preparation of the Directors' Report, including non-financial reports.

Each department has its own duties defined in the [Company's Organization and Operation Regulation](#), and all these elements function as a whole. The tasks, duties, and responsibilities of the operational staff are included in the job descriptions for each position.

The field experts within ROMGAZ Group monitor the implementation of policies, actions, targets, and the progress of indicators, in relation to the material impacts, risks, and opportunities. They report to department managers who exercise control over material topics, who report to the General Director, who in turn reports to the members of the Board of Directors.

The management of impacts, risks, and opportunities is covered by the current policies, described in the chapters of the Consolidated Sustainability Statement, related to significant environmental, social, and governance aspects. Such policies include a wide range of internal regulations and are monitored through the internal control system.

For the development of sustainability competencies, the operational team, including executive management and responsible directors, participated in ESG-related training in 2024, where new reporting requirements according to CSRD, legislative updates, and regulations in the sustainability area, relevant to Romgaz's field of activity, were discussed.

Additionally, to stay up to date with the most important industry information, including in the sustainability area, the Company and ROMGAZ Group's subsidiaries are members of various professional associations.

The Company's management also relies on external expertise for specialized consulting when necessary. In such cases, public procurement procedures are carried out according to the applicable legislation.

ROMGAZ Group employees are represented in their relationship with the Board of Directors and executive management through the two trade unions within the Company. These trade unions are involved in the decision-making process and are consulted on matters that may have a significant impact on employees, such as renegotiating salaries or working conditions, collective layoffs, or potential issues related to employees' rights and interests.

### **1.2.2 GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies**

The Risk Management Committee, among other responsibilities, is in charge of assessing and monitoring significant sustainability-related impacts, risks, and opportunities, as presented in section GOV 1 page 9.

The Risk Management Committee meets at least four times a year, as well as on an exceptional basis (at the request of at least two members), if necessary. Relevant information is communicated to the Board of Directors. In its first year of operation (2024), the committee met three times, and the meetings also covered sustainability topics.

The Board of Directors oversees how significant impacts, risks, and opportunities are integrated into the company's strategy, major transaction decisions, and risk management processes.

According to the regulations, these considerations may be included in the detailed analysis conducted by the Risk Management Committee, which submits proposals to the Board of Directors for:

- The adoption of ESG strategies that balance trade-offs between risks, opportunities, and impacts, ensuring their alignment with organizational objectives;
- The establishment of investment priorities and the implementation of effective control mechanisms.



During the reporting period (year 2024), the ESG topics analysed and managed by the Risk Management Committee and the Board of Directors were:

Topic Description addressed	Responsible	Frequency
Approval of the 2023 Sustainability Report	Risk Management Committee	Quarter 2
Information on the conduct of collective negotiations and the conclusion of a new collective labour agreement at the S.N.G.N. Romgaz S.A. unit level for a period of two years, starting from June 1, 2024.	BoD	Quarter 2
Report on the progress of achieving corporate governance and transparency objectives, as well as the fulfilment of financial and non-financial indicators committed to in 2023.	BoDCA	Quarter 2

The impacts, risks and opportunities related to its own operations and value chain, as listed in Section SBM 3, have been addressed at the level of ROMGAZ Group department directors and experts:

- In meetings and working groups organized throughout 2024 as part of the double materiality assessment;
- In the daily activities of departments, according to annual plans that address various identified impacts, risks, and opportunities (e.g., annual environmental plans, professional training plans, etc.).

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

ROMGAZ Group has implemented a [Remuneration Policy](#) that includes a fixed component and a variable component for its administrators and directors.

The fixed component is determined based on the complexity of the activity and the company's turnover, while the variable component is conditional on the achievement of financial and non-financial performance indicators approved by the General Meeting of Shareholders (GMS).

The variable remuneration component for non-executive and/or executive administrators is established based on financial and non-financial performance indicators, which differ for non-executive and executive administrators, and are established in accordance with GEO no. 109/2011 and are negotiated/approved by GMS, aiming to ensure the long-term sustainability of ROMGAZ Group and compliance with good governance principles.

When determining variable remuneration, the responsibilities of non-executive administrators are taken into account, including identifying long-term strategies, developing governance policies, representing shareholders' interests, communicating with shareholders, and overseeing the management's implementation of company strategies. The amount of the variable remuneration component for non-executive or executive members of the ROMGAZ Group Board of Directors may not exceed a maximum of 12 fixed monthly allowances.

The variable remuneration component for non-executive and/or executive administrators is reviewed annually, based on the achievement level of the objectives included in the administration plan and the degree of fulfilment of the financial and non-financial performance indicators approved by the GMS, which are annexed to the mandate contracts.

For non-executive directors, the variable component consists of 20% financial indicators and 80% non-financial indicators. For executive directors and directors with mandates, the proportion is 50% for financial indicators and 50% for non-financial indicators.

The non-financial performance indicators used to determine the variable component are linked to sustainability objectives and compliance with corporate governance principles. These indicators are reviewed annually to reflect progress in relation to the objectives set in the administration plans and the company's overall strategy.

Performance related to achieving ESG targets/objectives is also included as part of the mandate contracts for the three Directors, and for the four-year duration of the administration contracts, which includes the reporting year, these objectives were approved by GMS in the meeting held on September 11, 2023.

These were:

Non-financial indicator	Target
Decline in natural gas production	Maintaining a maximum annual decline
Scope 1 emissions in t	Reduction/maintenance of specific emissions of CO <sub>2</sub> (tCO <sub>2</sub> /MWh electricity produced)
Fulfilment of the natural gas supply obligation	100 % of contracted natural gas
Customer satisfaction score	Not less than 75 %
Market share	Greater than 40%
Average number of professional training hours per employee	Minimum 8
Number of safety training sessions	100% of employees
Total recordable accident frequency	Not more than 0,8%
Rate of independent members on the Board of Directors	Greater than 55%
Number of Board of Directors meetings	12/year minimum
Attendance rate at Board of Directors meetings	Not less than 90 %
Number of Audit Committee meetings	4/year minimum
Rate of women holding director positions	Not less than 30 %
Number of full-time equivalent employees	Minimum 99 % of average number of employees
Pay gap rate between female and male employees	Less than or equal to zero
Timely reporting of the company's performance indicators, according to the financial calendar	Full compliance with reporting deadlines
Implementation of the National Anti-Corruption System	Timely implementation of the measures set out in the Romgaz Integrity Plan

The remuneration policy was approved by the General Meeting of Shareholders on April 28, 2022, and sets both the level of remuneration and the general limits for the variable component. Policy updates shall be made at least once every four years or whenever necessary, and significant changes are subject to approval by the GMS.

#### 1.2.4 GOV-4: Statement on due diligence

ROMGAZ Group's due diligence process is designed to identify, prevent, mitigate, and respond to current and potential negative impacts on the environment and people.

Thus, the verification of compliance with and enforcement of internal policies and regulations is carried out by the Internal Audit team or by the departments designated for this purpose. For the environmental area, there is the internal procedure 'Environmental Inspection,' through which designated persons verify on-site compliance with national legislation and internal regulations.

Regarding human rights, during the reporting period, ROMGAZ Group applied the provisions of national legislation on this topic and did not have other special provisions in the company's governance documents.

To align with the best practices in the field, ROMGAZ Group developed and approved the '[SNGN Romgaz SA Human Rights Statement](#)' in March 2025. This is aligned with the fundamental principles of human rights as outlined in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, covering both its own workers and the value chain.

ROMGAZ Group requires its suppliers and partners to adhere to the same human rights and labor conditions standards, in accordance with the principles outlined in the Responsible and Sustainable Procurement Policy and also expects its suppliers to support and uphold the company's commitment to human rights, as highlighted in ROMGAZ Group's Code of Ethics and Business Conduct. Supplier contracts include clauses that address their commitment to respect human rights and environmental protection.

Regarding the value chain, no human rights verification processes were conducted during the reporting period.



Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	<p>ROMGAZ Group has integrated the due diligence process into all levels of governance, strategy and business model using the systematic assessment of ESG risks and opportunities.</p> <p>The Board of Directors and Risk Management Committee are the ones who ensure that impacts, risks and opportunities are identified, and response and alignment processes are implemented by executive teams.</p> <p>ESRS 2 GOV-2: - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies - page 14;</p> <p>ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes – page 14; and</p> <p>ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model - page 25</p>
b) Engaging with affected stakeholders in all key steps of the due diligence	<p>ROMGAZ Group collaborates with its stakeholders, including employees, customers, suppliers, local authorities and communities, to integrate their concerns into decision-making processes.</p> <p>The information can be found in the section ESRS 1 SBM 2 on page 24</p> <p>Specifically, for topics identified as material in 2024, detailed information are included in ESRS E1 page 59, ESRS E2 page 80 &amp; 82, ESRS E3 page 89, ESRS E5 page 103-104, ESRS S1 - page 118-119, ESRS S4 - page 140-141.</p>
c) Identifying and assessing adverse impacts	<p>Annual employee survey</p> <p>Annual customer questionnaire</p> <p>Pre-qualification questionnaires for suppliers</p> <p>ESRS 2 IRO - 1, including the implementation requirements related to specific sustainability issues in the relevant ESRS - page 26; and ESRS E1 page 60-62, ESRS E2 page 81, ESRS E3 page 90, ESRS E5 page 105, ESRS S1 page 120-124, ESRS S4 page 142, ESRS G1 page 152</p> <p>ESRS 2 SBM - 3 - page 26</p>
d) Taking action to address those adverse impacts	<p>The company implements measures to reduce the negative impacts of its activities as described in detail for each identified material issue:</p> <p>The information can be found in the thematic sections of MDR A as follows:</p> <p>ESRS E1 page 63, ESRS E2 page 84, ESRS E3 page 92, ESRS E5 page 107, ESRS S1 page 131, ESRS S4 page 146.</p>
(e) Tracking the effectiveness of these efforts and communicating	<p>The Integrated Management System and external certification, implemented by ROMGAZ Group, implies continuous monitoring of the efficiency of the implemented measures.</p> <p>The information can be found in the thematic sections of MDR T as follows: ESRS E1 page 68, ESRS E2 page 86, ESRS E3 page 99, ESRS E5 page 112, ESRS S1 page 133, ESRS S4 page 147.</p> <p>The communication of efforts is carried out through the communication channels presented on page 24 in ESRS 2: SBM 2.</p>

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

In order to manage the sustainability reporting process and the risks associated with it, according to the Organization and Functioning Regulation, the Sustainability Standards Office - ESG and the Reporting Service are subordinated to the General Manager of Romgaz.

The Sustainability Standards - ESG Office was established in 2024 and is responsible for managing and preparing the necessary formalities for adopting environmental, social, and corporate governance (ESG) reporting standards and for non-financial reporting.

The Reporting Service, established at the end of 2023, is responsible for managing and preparing the necessary and useful formalities for preparing the annual and mid year reports (management reports), which include, where applicable, non-financial reporting. Because these departments were newly established, for the 2024 reporting year, there was no specific approach or risk assessment methodology related to sustainability reporting and no risk analysis related to the reporting procedure was carried out. The company will analyze the opportunity and the way to regulate the process for future reporting, considering the experience of the first year of reporting according to the ESRS requirements.

However, to manage the risks related to the change in the reporting standard from GRI to ESRS, during 2024, representatives of the organizational units involved in the sustainability reporting process participated in a 16-hour training course to familiarize themselves with the new reporting requirements. In total, 47 employees participated in these courses. At the same time, for this first year of reporting, the ROMGAZ Group has selected an external consultant to provide support during the reporting process.

The information necessary for the preparation of the Consolidated Sustainability Reporting was collected manually (by e-mail) from subsidiaries and branches and centralized at the level of the Reporting Service that prepared the material for the ROMGAZ Group. The responsibility for the correctness of the data and information provided lies with the directors of the services involved in the provision of the data. In order to control the risks related to the misrepresentation of non-financial information, the 'four eyes' principle has been applied, which involves additional checks before consolidating the data to check the completeness and integrity of the information, as well as monitoring compliance with reporting requirements.

Sustainability reporting can affect public perception and investor confidence. Therefore, the Risk Management Committee monitors the reporting of sustainability information and related processes within the company to identify whether the reported information complies with the relevant sustainability reporting standards and if the processes can be improved. If necessary, the Risk Management Committee informs the Board of Directors.

In accordance with the ESRS requirements, the Consolidated Sustainability Statement must cover the impacts, risks, and opportunities identified as material by ROMGAZ Group, both for its own operations and the value chain. These were identified for 2024 through the double materiality assessment process, and the information required by the reporting standards is included in detail in the thematic section.

## 1.3 Strategy

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

#### About ROMGAZ Group

The activities of ROMGAZ Group are as following:

- Natural gas exploration and production (carried out by Romgaz and RBS subsidiary);
- Underground storage of natural gas (within the Depogaz subsidiary);
- Supply of natural gas;
- Special operations and well services;
- Maintenance and transport services;
- Power generation;
- Distribution of natural gas.

#### Exploration

The exploration activity is performed in 8 perimeters in Transylvania, Muntenia, Oltenia and Moldova under the Concession Agreement approved by GO No. 23/2000, starting with October 1997.

The exploration is currently being carried out on the basis of Amendment No. 6 (approved by GD No. 1011/22.09.2021) to the Exploration and Development Exploitation Concession Agreement (D.E.) approved by GD no. 23/2000, for which the validity is 6 years (10.10.2021 - 09.10.2027), with an approved minimum program comprising 36 wells of minimum of 92.000 m and 1.000 km<sup>2</sup> of 3-D seismic for all 8 perimeters, the total program amount being USD 195 million.

The RBS subsidiary holds 50% of the rights and obligations associated only with the Concession Agreement for oil exploration, development and exploitation in the XIX Neptun perimeter, the deep water area in the Black Sea (the "Neptun Deep" project perimeter). The exploration activity within the Neptun Deep perimeter is ongoing, the objective being to further identify and evaluate the energy potential of the Black Sea.

The exploration work is designed and prioritized by Romgaz, on the basis of technical-economic principles, with a view to increasing the pool of hydrocarbon resources and reserves and maximizing the prospective potential of the 8 concessioned exploration and development-exploitation areas.

#### Production

The annual program of oil operations for the exploitation of hydrocarbon deposits for 2024 envisaged the dynamics of natural gas demand, the carrying out of well reactivation, refitting and intervention works, the production of new operating wells and of those resulting from exploration activities, maintenance programs at collecting pipelines, compression and gas drying stations.

As for Neptun Deep, the project aims to exploit the natural gas discovered in the Black Sea, through the development of two confirmed natural gas fields (Domino and Pelican Sud). For the 2024 reporting year, the project is in the development stage. The development phase began in 2023, after the co-owners of ROMGAZ Group and OMV Petrom adopted the investment decision and submitted the Field Development Plan to the competent authority. The Development Plan was approved by the National Agency for Mineral Resources (currently the National Regulatory Authority for Mining, Petroleum and Geological Storage of Carbon Dioxide/NARMPG) on August 3, 2023. The field development phase consists of the construction of 10 gas exploration wells, 3 underwater production systems, an offshore production platform, a gas collection pipeline from the production platform to the shore in Tuzla and an onshore gas metering station in Tuzla. The holders are jointly investing up to 4 billion euros for the development of the Neptun Deep project.

### Natural gas underground storage

There are currently 6 operational storage facilities in Romania, all set up in depleted deposits. Romgaz owns and operates, through Depogaz branch, 5 deposits summing up a storage capacity of 4,065 mld.m<sup>3</sup> and an active workload of 2,870 mld.m<sup>3</sup>.

The Government of Romania, by EO No.106/2020 amending the Electricity and Natural Gas Law No. 123/2012, decided to cancel the regulation of the gas storage business. Thus, after the extraction cycle 2020-2021, the storage activity is no longer a regulated activity.

### Natural gas supply

The Romanian gas sector, after deep restructuring, has now become divided into independent activities. The structure of the Romanian natural gas market comprises an operator of the National Transmission System - SNT (Transgaz), producers (of which Romgaz and Petrom are the most important), underground storage operators (of which Depogaz holds 90.54 % of Romania's total storage capacity), gas distribution and supply companies to final customers and suppliers on the wholesale market.

In 2022, in the international context generated by the price increase on energy markets, in order to ensure rigorous discipline on the national market and a high degree of consumer protection in economic and social terms, it was adopted the GEO No. 27/2022 regarding the measures applicable to final customers on the electricity and gas market during 1 April 2022 - 31 March 2023, as well as for the amendment and completion of certain regulatory acts in the energy field. The effective period of the GEO No. 27/2022 was subsequently extended until 31 March 2025.

Thus, since April 2022, the segment of household consumers and heat producers has been significantly regulated, both in terms of prices and contracted quantities.

Romgaz was designated as gas supplier of last resort (FUI) by the Romanian Energy Regulatory Authority (ANRE) by Decision No. 1616/2022. February 2023 was the first month when quantities under FUI regime were supplied; subsequently, every 7 months, Romgaz took over the customers without suppliers. Although until its appointment as FUI, Romgaz did not operate on the retail market, its FUI activity is successful, with positive customer feedback.

Romgaz, as gas supplier, held a significant share in national consumption between 2017 and 2024, with a share of between 37-50%, as follows:

	M.U.	2017	2018	2019	2020	2021	2022	2023	2024
Country total consumption	mld.mc	12.3	12.3	11.5	12.0	12.3	10.4	9.7	10.1
Romgaz trading (domestic + import)	mld.mc	5.7	5.6	5.1	4.7	5.2	5.1	4.8	4.8
Romgaz market share	%	46.3	45.5	44.1	39.1	42.4	49.4	50.0	48.0

The above-mentioned quantities include gas from domestic production, including technological consumption, domestic gas purchased from third parties, gas from the 100% association with Schlumberger (until 2018) and imported gas. Deliveries also include gas delivered on the domestic market, including at Iernut and Cojocna for electricity generation.

## **Intervention services and special operations at wells**

SIRCOSS was established in 2003 based on the shareholders' general assembly resolution No. 5 of June 13, 2003.

The SIRCOSS services cover two main activities:

- Well interventions, reequipments, additions and production;
- Well special operations.

## **Transport and maintenance**

STTM was established in October 2003 by taking over the transport equipment from Mediaș, Târgu Mureș and Ploiești branches.

The activity of the branch is to carry out transport of goods and persons, specific technological transport, vehicle repair and maintenance in the Group's and third parties' interest.

The STTM car fleet is diversified, including motor vehicles and machinery for the following types of transport services:

- Passenger transport by passenger cars, minibuses, buses and coaches;
- Mixed transportation with self-propelled < 3,5 t and self-propelled > 3,5 t;
- Technology transportation by trucks, platforms, dumpers, vans, vans, tankers, motorcycles and crane trucks;
- Transport and work with machinery: tractors, bulldozers, front loaders, earthmoving machines, excavators.

Fleet maintenance is carried out through their own repair shops. STTM owns, at the four stations (Târgu Mureș, Mediaș, Ploiești and Roman), workshops authorized by the Romanian Car Registry, with specialized maintenance personnel for motor vehicles and STTM machines.

The types of maintenance services are of great diversity, provided by mechanical, electrical and automation trained staff.

## **Electricity generation**

CTE Iernut represents a significant node in SEN (National Energy System), located in the center of the country, in Mureș county, on the left bank of Mureș river, between Iernut and Cuci localities, with facilities for methane gas supply, industrial water and power evacuation.

CTE Iernut is operated through Romgaz Electric Power Production Branch (SPEE).

CTE Iernut has an installed capacity of 800 MW, comprising 6 energy groups: 4 groups each of 100 MW of Czechoslovak manufacturing and 2 groups each of 200 MW of Soviet manufacturing. The groups were put into operation between 1963 and 1967. Considering the commencement of the investment work at the 430 MW Combined Cycle Plant and the need to ensure the adequate conditions to perform the execution works on the corresponding cooling circuit, the 200 MW Group 6 was definitively withdrawn from operation in November 2019.

In January 2019, groups 2 and 3 of 100 MW were definitively withdrawn from commercial operation, in November 2019, group 1 (100 MW) followed and in June 2020 group 4 was withdrawn, all of them being withdrawn for the reason of non-compliance with environmental conditions. In 2024, only energy group No. 5 of 200 MW was functional in SPEE Iernut.

## **Natural gas distribution**

Natural gas distribution is a regulated activity, being performed through two distributions within Targu Mures Manufacturing Branch. Romgaz has contracts for the concession of the distribution of public service with the Ghercesti territorial administrative units (Dolj County) and Stejari (Gorj County).

There are no products and services of ROMGAZ Group that are prohibited on certain markets.

## **ROMGAZ Group value chain**

Upstream, ROMGAZ Group purchases natural resources such as natural gas, solar renewable electricity and water. At the same time, in terms of products, ROMGAZ Group purchases

electricity/fuel, specific equipment, protective equipment and spare parts for its own operations. In terms of services, ROMGAZ Group contracts drilling, seismic research, financial and consultancy services, surface infrastructure execution, market studies, feasibility studies, banking, insurance, investment products and opportunity studies. To minimize possible negative impacts, ROMGAZ Group selects product and service providers, including based on certain social, environmental and governance criteria.

For the analysis of the value chain (its graphic representation is included at page 21), all the activities carried out by the three entities forming the ROMGAZ Group were considered as representing its own operations. More specifically:

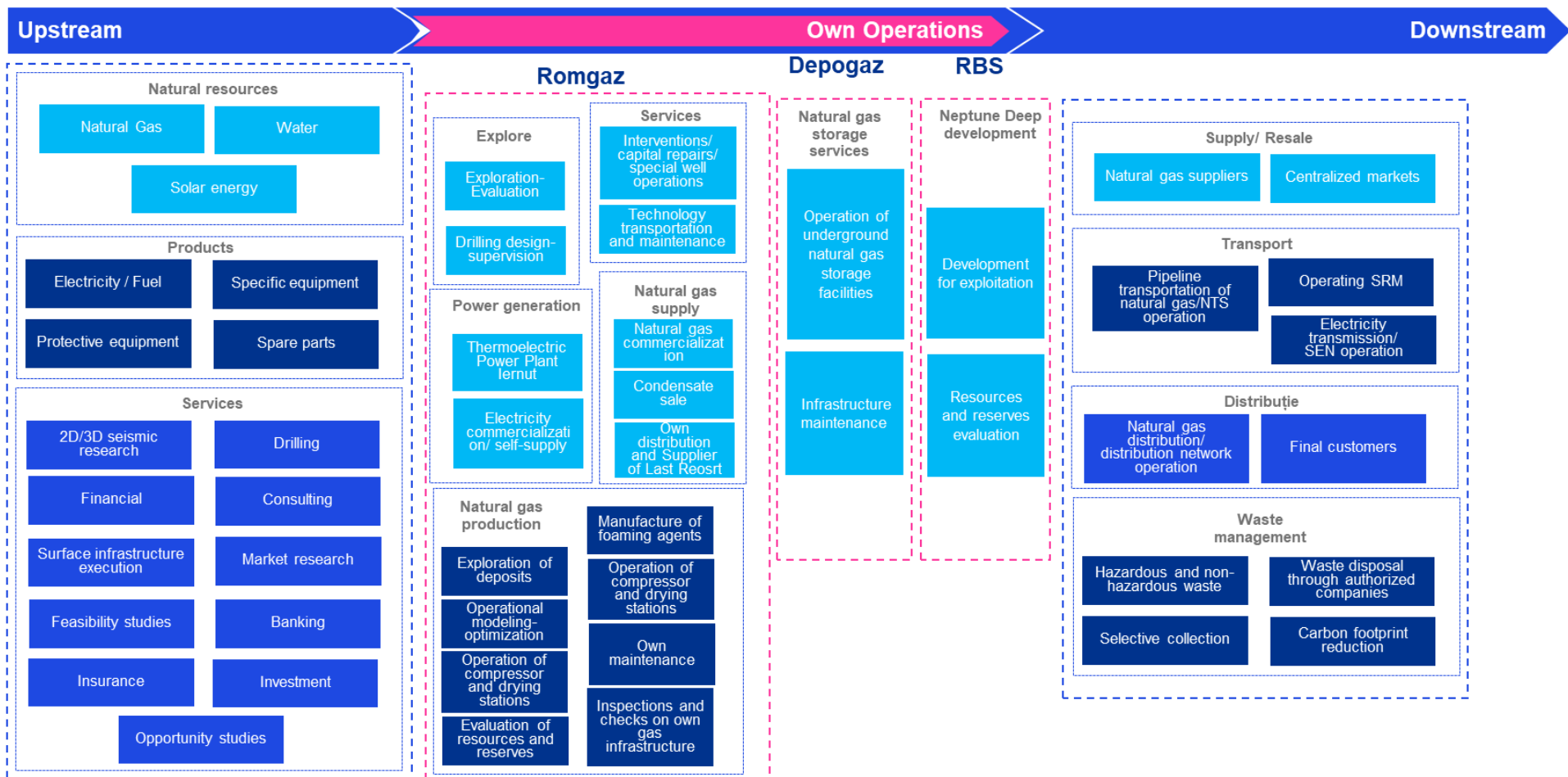
- For Romgaz: the activities include exploration (evaluation, design and supervision of drilling), services (interventions, capital repairs and special operations at wells, technological transport and maintenance), electricity production (exploitation of the Iernut CTE, marketing and self-supply of electricity), exploitation - production and marketing of natural gas (own distribution and integrated single supply - FUI).
- The activity of Depogaz subsidiary concerns the storage of natural gas, the operation of underground storage and the maintenance of gas storage infrastructure.
- The RBS subsidiary focuses on the development for the exploitation of the natural gas field perimeter in the Neptun Deep perimeter, including the development of activities for exploration and evaluation of resources and reserves.

For the reporting year, ROMGAZ Group had 5,977 employees, all active in Romania.

Downstream, ROMGAZ Group sells natural gas to customers (final customers, producers of heat for the population, electricity producers, producers of chemical fertilizers, operators of gas distribution, transport and storage systems for technological consumption). The transport of natural gas is carried out through pipelines through the National Transmission System (SNT) and the Adjustment and Measurement Stations (SRM). The electricity generated at Iernut is transported through the National Energy System (SEN). As for distribution, ROMGAZ Group deals with the distribution of natural gas, the operation of distribution networks and the servicing of final customers.

Various types and quantities of waste result from its own activities. Their management is carried out through authorized firms.

The company's business model and customer strategy aim at digitizing their interaction as a way to increase their satisfaction and to implement continuous service improvement processes based on customer feedback.



<b>Total number of employees per geographical area - Romania</b>	<b>5,977</b>
Total revenue	7,929,436 thousand RON
Revenue according to ESRS material sectors	N/A
Revenue from fossil fuels (coal, oil and natural gas)	6,998,469 thousand RON
Revenue from coal	N/A
Revenue from oil - condensate	93,780 thousand RON
Revenue from natural gas	6,904,689 thousand RON
Revenue from taxonomy aligned economic activities related to fossil gas	0
Revenue from chemical products	N/A
Revenue from controversial weapons	N/A
Revenue from tobacco cultivation and production	N/A

Natural gas and electricity are the main products supplied by Romgaz in the reporting year, while Depogaz provides gas storage services. The products and services of both entities are addressed to the Romanian market.

During the reporting period there were no changes with regard to the products and services provided or groups of customers served.

In 2024, ROMGAZ Group operated on two types of markets: the regulated market (according to the GEO No. 27/2022), where it performed gas distribution activities, and the non-regulated market, where it performed gas and electricity production and supply, as well as underground gas storage activities, both through bilateral negotiation, and on the centralized market managed by the Romanian Commodities Exchange (BRM).

#### **ROMGAZ Group:**

- Held a market share of approximately 48% of gas deliveries in Romania's total consumption;
- Held a market share of 1.67% on the wholesale electricity market;
- Is the most important supplier of underground gas storage services, holding approximately 93% of Romania's total storage capacity.

Both the Integrated National Energy and Climate Plan (PNIESC 2021-2030) and Romania's Energy Strategy (2025-2035, with the perspective of 2050) are national strategic documents aligning Romania's energy and climate priorities with the European Union's objectives on climate neutrality. Both documents note that natural gas, and thus ROMGAZ Group holding a significant market share, play an indispensable role in Romania's energy mix and will remain a crucial source of energy for the coming period. However, as the energy sector makes the transition to climate neutrality, ROMGAZ Group's business strategy must incorporate sustainability elements.

At national level, the overall status of these emerging technologies is at an early stage compared to other EU countries, while the successful implementation of these technologies is dependent on several key factors. For the next period, it will be imperative that ROMGAZ Group correlate investment levels with the return on investment and follow the regulatory framework to support the predictability of such investments. In addition, the development of the necessary infrastructure involves multiple players in the value chain and not least ensuring sufficient demand for such services/products from final consumers.

According to the Strategy, ROMGAZ Group focuses on four strategic targets/directions addressing the impacts, risks and opportunities of the sector where it operates, as well as on how it relates to the value chain. The directions are:

- Creating long-term and equal relationships with the market and the social environment;
- The company's digital transformation and supporting innovations to enable new ways to interact with customers, increase the efficiency of the company's own operations and support new directions for development (e.g., entry into the household market, digitization of internal processes to save resources etc.);
- Continuous development of the resource portfolio, with an emphasis on mitigating the effects



of climate change, focusing on resilient hydrocarbons, operational safety and reliability (e.g., cooperation with green technology providers, offering training programs to employees covered by digitization and transition to a sustainable economy);

- Low-carbon electricity and energy, with large-scale use of renewable energy resources, identifying hydrogen positions and developing a gas customer portfolio to complement this low-carbon energy.

The dynamics regarding legislative changes and requirements, especially those aimed at climate-related aspects, as well as ROMGAZ Group's objective to align with the targets assumed at European level, require the updating of the existing ROMGAZ Group Strategy.

Consequently, the company has initiated in 2024 a project to develop a decarbonization strategy taking into account the requirements of the Paris Agreement. Subsequently, the sustainability/business strategy will also be revised in order to be aligned with the new requirements and set measurable medium- and long-term targets in compliance with market expectations, but no deadline has been set yet for this process.

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

Stakeholders are defined as entities or persons who can affect or be affected by the company's activity. Some of the stakeholders may belong to the two groups. ROMGAZ Group identified the relevant stakeholders for all its operations as follows:

- **Employees.** They are involved once a year in the internal consultation process for gathering feedback and integrating it into ROMGAZ Group's business strategy and model. In addition, they have the following dedicated platforms and resources available to send any suggestions or referrals throughout the year:
  - The reporting channel, accessible to public interest whistleblowers, available in Romanian and English on the website [www.romgaz.ro](http://www.romgaz.ro), Sustainability, Ethics and Integrity, Whistleblower on the link [www.romgaz.ro/form/avertizor-de-interes-public](http://www.romgaz.ro/form/avertizor-de-interes-public);
  - Internal reporting channel accessible to public interest / internal whistleblowers available in Romanian on intranet Infoweb: Information, Ethics and Business Conduct, Whistleblower Section | ROMGAZ;
  - By post, to S.N.G.N. Romgaz S.A., Piața C.I. Motaș No. 4, PO 551130, Sibiu County, Romania, with the note "Confidential - To the attention of the Ethics Adviser ROMGAZ";
  - By e-mail to the e-mail address dedicated to the Ethics Adviser: [consilierdeetica@romgaz.ro](mailto:consilierdeetica@romgaz.ro);
  - Through the Registry, in enclosed envelope, with the note "Confidential - Complaint to the attention of the Ethics Adviser";
  - Personal submission of the complaint to the Ethics Adviser.
- **Suppliers of products and services (contractors).** The collaboration with suppliers is governed/supported by commercial contracts. The Supplier Code of Conduct has been available since January 2025, establishing ethical standards and sustainability requirements. ROMGAZ Group maintains an active dialog with its suppliers through communication channels: websites, e-mail, questionnaires, telephone, official addresses etc., for the purpose of improving the products and services provided.
- **Shareholders/Institutional investors/analysts.** Shareholders are informed by annual meetings, regular reports and other events such as round tables and conferences organized by the Board of Directors, while the Investors Relations Office is their point of contact. Sustainability information is part of this regular information.
- **Communities** (non-profit organizations, community members, city halls, educational institutions, hospitals etc.). ROMGAZ Group supports local communities through social responsibility initiatives which include partnerships with non-profit organizations, educational institutions such as universities and high-schools, and members of the community. The actions aim at developing education and supporting vulnerable groups

through donations and awareness campaigns. As part of the environmental impact assessment procedures according to legal requirements, ROMGAZ Group shall maintain contact with affected communities when requested by the competent authorities. Based on the nature of the complains, the communities have various communication channels at their disposal. Contact data are available on [www.romgaz.ro](http://www.romgaz.ro), Contact section.

- **Financiers/Banks.** The relationship with the banks is determined and targeted at supporting the strategic initiatives of the Company, ensuring an adequate level of transparency and collaboration. The funding criteria, including the ESG-related ones, are taken into account by the Company in defining its strategic directions, while the Company also responds to sustainability data requests deriving from them.
- **Customers.** According to the specific regulations, including Order No. 173/2020 issued by ANRE, ROMGAZ Group directly collaborates with final consumers and natural gas distribution operators. The purpose of such cooperation is to ensure constant communication and facilitate the effective resolution of any problems related to the services offered. In addition, consumers are annually consulted through surveys and questionnaires to obtain feedback. The results are centralized, analysed and reported to management. The client categories in the portfolio, depending on the activity provided, are the following: final consumers, heat producers for the public, electricity producers, chemical fertilizer producers, distribution, transmission and gas storage systems operators for technological consumption.
- **Regulatory authorities/organizations.** ROMGAZ Group shall collaborate with the regulatory authorities and organizations by participating at public consultations where appropriate. The Company also complies with the reporting and monitoring requirements imposed by the authorities, and the company's business strategy and model are aligned with these requirements.
- **Centralized market operators,** i.e. the Romanian Commodities Exchange and the Romanian Electricity and Gas Market Operator (OPCOM). These operators shall make available transparent platforms for the trading of natural gas and electricity within a regulated framework, in a transparent manner, for the competitiveness of requests and bids;
- **Trade unions / Trade union confederation.** There are two trade unions within ROMGAZ Group, namely:
  - The Free trade union of S.N.G.N. Romgaz S.A., with an employee representation rate of 98.61%;
  - The trade union of Depogaz subsidiary, with an employee representation rate of 97.25%.

The management teams meet with trade unions whenever necessary. Their proposals are analysed and incorporated into the Company's business strategy, especially for in relation to the social area.

- **Media institutions.** ROMGAZ Group maintains an open relationship with media representatives, providing up-to-date information about its activity through press releases, launch events, interviews and media collaboration, website.

In addition, when conducting the double materiality assessment in 2024, a questionnaire was transmitted to all these stakeholder groups, to enable them to transparently participate at identifying impacts, risks and opportunities related to ROMGAZ Group's activity, products and services.

During the reporting period, based on the information collected from interested stakeholders, no changes were made to the Company's business strategy and model.

In order to comply with legislative requirements, during the reporting period, ROMGAZ Group started developing a decarbonation strategy, which once finalized and approved, can lead to changes in the business model.

No changes in the interaction manner with external stakeholders have been done or are expected to be implemented. For communication with employees, a project meant to strengthen organizational culture is under implementation. The first phase is the creation of a digital internal communication

platform which is to become operational in 2025.

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

During 2024, ROMGAZ Group focused on identifying and assessing the material impacts, risks and opportunities related to its own operations, in line with the ESRS requirements and the required due diligence principles.

The data recorded by ROMGAZ Group in the Risk Register and related to sustainability topics were also used throughout the assessment process. The Risk Register is established annually, following risk assessment, in accordance with the internal risk management procedure.

Detailed information on the impacts, risks and opportunities identified, as well as on the location of the impact, the time horizon and the way they interact with ROMGAZ Group's business strategy and model, is to be found in the topical sections.

There are no impacts, risks and opportunities presented that are subject to other reporting requirements.

Since 2024 is the first reporting year according to ESRS standards, no comparative changes are presented.

The material risks and opportunities have not had a measurable impact on ROMGAZ Group's current financial position, financial performance and cash flows. Although the immediate impact on financial performance was not significant, internal estimates suggest that, in the long term, the transition to a more sustainable business model could influence cash flows and capital costs, especially in terms of investments in reducing the carbon footprint and the costs of adapting to climate change if the high emissions scenarios materialize for Romania. To the same extent, the implementation of green energy projects to diversify the portfolio and partnerships to reduce Scope 3 emissions can present significant opportunities for the resilience of the ROMGAZ Group's strategy and business model.

For the reporting year, the risks and opportunities identified were not assessed as material for the value chain. Especially in the medium and long term, as the ROMGAZ Group will make the transition to climate neutrality, the value chain may undergo significant changes. The ROMGAZ Group will have to create long-term partnerships for decarbonization and circularity, thus influencing downstream companies. At the same time, a change in the mix of customers and markets served is also possible.

Climate change adaptation and mitigation have been identified as a strategic risk to be addressed by the company's decarbonation strategy. The financial effects of climate change and the ones related to energy transition may be presented after its approval in 2025.

The resilience of the strategy and business model is important for the Company, and its current strategic and internal regulatory framework (Integrated Management System) is designed to be adaptable, and to enable the company to manage ESG related risks.

For all the details regarding the Company's impacts, risks and opportunities, and how they are integrated into ROMGAZ Group's business strategy and model, please refer to the topical sections.

## **1.4 Impact, risk and opportunity management**

### **1.4.1 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities**

The process to identify and assess the material impacts, risks and opportunities accomplished by ROMGAZ Group in 2024 was conducted as part of the double materiality assessment, according to the requirements of the CSRD, transposed into national law by MFO No. 85/2024.

The process of double materiality assessment involved stakeholders' engagement (as defined in section SBM 2), interviewing ROMGAZ Group management and expert teams, consulting specialized literature and company's internal documents, sustainability reports of similar companies, as well as material topics identified by ESG rating agencies or financiers for the industry ROMGAZ Group belongs to.

The double materiality assessment covered all subsidiaries and branches described in section BP-1 and it included the upstream and downstream value chain.

Throughout the double materiality assessment, the Company complied with the fundamental principles governing it, i.e. it analysed:

- The materiality of the short, medium and long-term positive and negative impacts which ROMGAZ Group has or might have upon the environment and society;
- The financial materiality to determine how sustainability matters may influence the short, medium and long-term financial performance of the company.

Since the double materiality assessment is a complex process, ROMGAZ Group has established a project team and benefited from the support of an external consultant.

The project team included representatives of the departments with responsibilities in sustainability reporting and of the operational departments (Environmental Quality, OHS, Communication, Methane Emission Management, Human Resources etc.).

The double materiality assessment was conducted in several stages, as follows:

### **1. Identification of the potential material topics**

The following activities were conducted to identify the potential material topics:

- Assessment of industry trends – analysis of public sustainability data of similar companies from the European market and of ESG rating agencies;
- Assessment of the sustainability regulatory framework impact on ROMGAZ Group;
- Consideration of the international sustainability reporting standards that ROMGAZ Group intends to adopt;
- Management consultation to align and integrate sustainability priorities with ROMGAZ Group's business objectives.

The identification of the potential material topics that has formed the long list took into account factors like field of activity (exploration-production, transport, distribution or a combination of the these), primary economic activities (gas, electricity, storage), geographical coverage (national, regional, global), business model, governance practices etc.

Once the long list was established, it was analyzed how many companies similar with ROMGAZ Group included each material topic in their most recent materiality assessments, and these results were compared with the double materiality assessment conducted by ROMGAZ Group in 2023 in compliance with the Global Reporting Initiative (GRI) standards. According to the rating agencies' assessments for the oil and gas exploration and production industry (SASB and MSCI), it is specific for this industry to focus more on environmental material topics such as greenhouse gas emissions, biodiversity and pollution, as well as on social material topics such as health and safety in operation. In addition, the list of material topics of the European Bank for Reconstruction and Development has also been considered, given the possible funding by this institution of future ROMGAZ Group projects on decarbonization.

Due to the specificity of the industry, a determined threshold was set for each ESG pillar (environment, social, governance) to determine whether a material topic was considered relevant by most of the companies under analysis. The arithmetic mean was calculated for each material topic (based on the total number of similar companies and rating agencies that considered the topic relevant). If a material topic was considered more than the arithmetic mean set as threshold for each ESG pillar, that topic was highlighted to be discussed with the ROMGAZ Group management team.

Following the consultation with ROMGAZ Group management, the list of material topics was narrowed down to the prevailing ones. Specific questions were elaborated based on this list for each topic, which were subsequently used to develop the questionnaire for interested stakeholders' consultation.

ROMGAZ Group's management played an active role throughout the materiality assessment process, being involved in the identification and validation of potential material topics and stakeholders, as well as in the validation process of the results achieved.

### **2. Stakeholder consultation**

Stakeholders were identified by ROMGAZ Group's project team during an internal workshop considering the company's business model and commercial relations, as well as by taking into consideration the potential impact of its activities and products on these stakeholders. The following

were identified as stakeholders and benefitted from the same representation weight throughout the assessment process:

- ROMGAZ Group employees;
- Shareholders/Institutional investors/analysts;
- Suppliers of goods and services (contractors);
- Centralized market operators;
- Educational institutions;
- Hospitals;
- Trade unions/Trade union confederations;
- Media institutions;
- City halls;
- Banking institutions;
- Customers (final customers and/or energy suppliers);
- Regulatory and supervisory authorities;
- Non-governmental associations and foundations.

The stakeholder engagement process was conducted as follows:

- **Determination of the sample:** Before the consultation started, the possibility of sampling respondents for each category of stakeholders was considered. This process involved determining the required number of respondents and the proportion of each stakeholder group that should be represented in the sample. But it was decided that the questionnaire should be made available to the entire target audience, covering each group of stakeholders identified. The exception to this approach was taken for suppliers in relation to which the questionnaire was made available to 35 suppliers. The selection of suppliers was accomplished by applying a threshold value, suppliers with contracts above RON 5 million being considered relevant. The total value of the contracts that ROMGAZ Group has with these suppliers represents 83 % of the total ROMGAZ Group contracts in 2023.
- **A contact database was created** and subsequently used for the engagement process. In addition, for employees who do not have access to e-mail, a QR code was generated to access the questionnaire from the mobile phone. If employees could not access the QR code, a communication campaign was conducted where the head of branches supported the employees and also provided the questionnaire in other formats, including printed ones.

The project team drafted a questionnaire with questions on the material topics identified to be used as a tool for stakeholder engagement. As regards the employees, the questionnaire was sent to all the employees, thus eliminating the need for sampling.

To assess the importance of each potential material topic, a scale of 1 to 5 was used, where 1 is of minimal importance and 5 is extremely important. This scale allowed for the quantification of the level of impact associated with each topic for ROMGAZ Group.

For the employee category, e-mails were sent to 2,385 employees out of the total of 5,946. For employees who do not have company e-mail addresses, a QR code or a printed version of the questionnaire was made available. These figures also include the subsidiaries RBS and Depogaz, the breakdown being as follows: RBS - 13 e-mails to all 13 employees; Depogaz – e-mails sent to 240 employees out of the total of 510; ROMGAZ Group – e-mails sent to 2,132 employees, out of the total of 5,423. For employees of Depogaz and Romgaz who do not have access to e-mail, the questionnaire was available via QR code and in printed form.

For the category of shareholders, investors and analysts, 33 questionnaires were sent. Of these, 15 were sent to shareholders (1 majority shareholder and 14 other shareholders), 4 to capital market institutions and 14 to analysts and investors (12 analysts and 2 individual investors).

For the trade union category, out of a total of 6 unions, federations and confederations, 5 questionnaires were sent: 1 to the ROMGAZ Group trade union and 4 to other trade unions that ROMGAZ Group is a member of. The sixth trade union actually is an international body which the five trade unions are affiliated to. As a result, the consultation of this stakeholder was considered irrelevant.

For the category of banking institutions, 13 questionnaires were sent to the institutions with which ROMGAZ Group has collaborative relationships with.

For the category of customers, 68 questionnaires were sent to representative customers of Romgaz and Depogaz, out of a total of 70 customers with bilateral contracts.

For the category of operators of the centralized market, 2 questionnaires were sent to the operators of the centralized markets which ROMGAZ Group operates on.

For the category of suppliers, 35 questionnaires were sent to the relevant suppliers out of a total of 1,526 suppliers. They were selected by applying a value threshold by ROMGAZ Group.

For the category of media institutions, questionnaires were sent to 85 sub-categories, representing the media entities interested in the work and results of ROMGAZ Group. Thus, six questionnaires were sent to news agencies, 9 to TV stations, 7 to radio stations, 23 to newspapers and 40 to online publications.

For the category of associations and foundations/organizations, questionnaires were sent to 83 sub-categories. Of these, 67 questionnaires were sent to associations, 8 to foundations and, out of a total of 13 national and international organizations, 8 questionnaires were sent to national organizations.

For the category of regulatory and supervisory authorities, 73 questionnaires were sent to all regulatory and control authorities.

For the category of educational institutions, 13 questionnaires were sent to institutions which ROMGAZ Group has partnerships with or that received financial support to undergo projects of community interest, respectively sponsorship.

For the category of hospitals, 8 questionnaires were sent to hospitals that received financial support from ROMGAZ Group for rehabilitation and modernization projects.

For the category of city halls, 35 questionnaires were sent to city halls in areas where ROMGAZ Group has exploration, production etc. units, and where its activity could have a relevant impact on the community (employees in the area, local taxes etc.).

The questionnaire process took place from 14 August 2024 to 4 September 2024 and had an average response rate of around 29.4 %.

On the basis of the questionnaires collected, the results were evaluated taking into account the importance given to each topic by each stakeholder and a hierarchy of material topics was done. The company's management also graded this list of material topics, and an intermediate list of potential material topics was thus obtained by combining the two scores.

A materiality threshold of 50% was applied by the management team to this list. Thus, to continue the assessment, material topics in the first half of the ranking, i.e. 50%, were considered, ensuring that the assessment focused only on the most relevant topics for the company and stakeholders.

The following arguments were brought to establish the materiality threshold during the meeting, helping its adoption from multiple perspectives:

- Compared to rating agencies: Setting up a 50% threshold enabled material topics in the upper part of the sample selected by the senior management to fully cover the material topics specific to the sector where ROMGAZ Group operates, according to SASB and MSCI.
- Risk management: Setting up a 50% threshold can help ROMGAZ Group to focus on the most relevant risks and opportunities. Focusing on the top 50% of the material topics ensures that the issues that could have the greatest impact on ROMGAZ Group's financial performance and its stakeholder relations are addressed.
- Resource allocation: A 50% threshold allows ROMGAZ Group allocate its resources more effectively. Instead of spreading its efforts on numerous material topics, the company can devote more time and resources to the most critical issues, leading to more efficient management and reporting.
- Regulatory compliance: Many regulatory frameworks, such as the Corporate Sustainability Reporting Directive (CSRD), require companies to report material topics in detail. Using a 50% threshold ensures that ROMGAZ Group meets all requirements by focusing on the topics with the greatest impact.
- Stakeholder involvement: By giving priority to the top 50% of material topics, ROMGAZ Group can better address the interests and views of both internal and external stakeholders.

- Strategic decisions: Focusing on fewer topics, ROMGAZ Group can obtain valuable information for strategic decision making. Thus, ROMGAZ Group can identify key areas for improvement and innovation, aligning its sustainability efforts with its overall business strategy.
- Transparency and comparability: A 50% threshold can improve the transparency and comparability of ROMGAZ Group's sustainability reporting, facilitating stakeholder understanding of the company's priorities.

In addition to the topics considered material following the application of the 50% materiality threshold detailed above, the company management considered it relevant to add three more topics on a voluntary basis. The score of these topics was borderline with the materiality threshold.

### 3. Assessment of impacts, risks and opportunities

On the basis of the material topics identified during the prior phase, the project team started the process to identify impacts, risks and opportunities. The process included internal workshops, analysis of literature and internal materials.

The company assessed and located these impacts, both in its own operations and in relation to suppliers and partners. It evaluated how the company's strategies and activities impacted people and the environment, including both the direct effects of its own activities and those resulting from business relations. Positive and negative impacts were analysed in the short, medium and long term, associated with either internal operations or the upstream or downstream value chain.

For the impact assessment process, the Company used a combination of quantitative and qualitative criteria, including impact scale (1-5), scope (local, regional or global), irremediability (for negative impacts) and probability (for potential positive and negative impacts). The quantitative thresholds were set to determine the relevance of the themes and the qualitative criteria provided background for the interpretation of the results.

In the impact assessment process, the direct and indirect effects of the company's activities were analyzed, given the positive and negative impacts. The qualitative characteristics analysed included the location of the impact, whether it materialized upstream, in the company's own activities or downstream, and the time horizon, i.e. short, medium or long term. A key aspect was the determination of potential impacts on human rights, which are prioritized in line with the ESRS requirements.

The prioritisation of negative impacts on the basis of severity and probability was carried out taking into account, cumulatively and in aggregate, the location of the impact, its cause, time horizon, scale, purpose and remediation possibilities. In the case of future negative impacts, probability was also taken into account. In addition, for each negative impact, a potential adverse effect on human rights was considered, in which case the severity of the impact outweighs its probability.

Each of these parameters was noted according to a quantitative scale and the reasoning was analysed to ensure relevance.

The process of identifying financial materiality was started by identifying risks and opportunities that may influence the company's future financial performance and cash flows. In this context, financial thresholds were set in line with the Risk Management system procedure.

By aligning with the Risk Management system procedure and harmonizing the methodology for scoring and assessing risks and opportunities associated with sustainability, the company has ensured the possibility of analyzing them directly, compared to other categories of risks specific to its field of activity, bringing them to a common denominator.



## Financial materiality thresholds

Potential magnitude of the financial impact		
Explanation	Estimation of the financial impact based on the descriptions of continued resource use, dependency on relationships and other effects on future cash flow.	
5.	very large impact	very high impact, above EUR 3 million
4.	large impact	large impact between EUR 1.5 million and EUR 3 million
3.	medium impact	average impact between EUR 0.7 and EUR 1.5 million
2.	low impact	low impact between EUR 0.1 million and EUR 0.7 million
1.	no impact	intangible impact

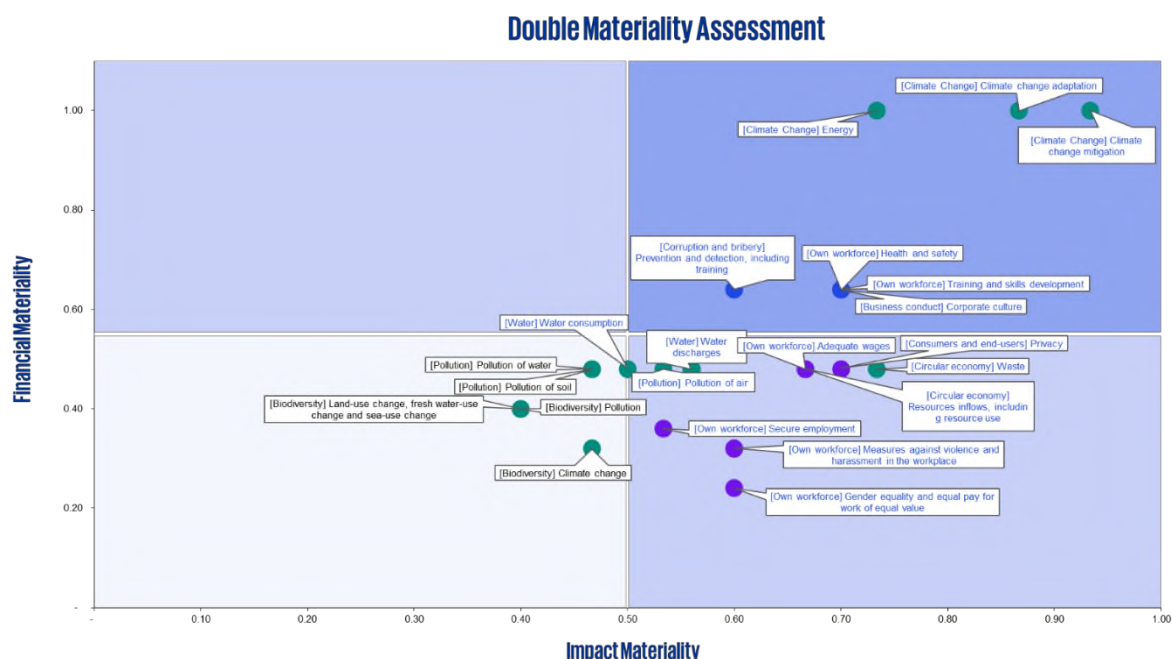
The quantitative assessment included the analysis of continued resource use and dependence on resources in the value chain and other effects on future cash flows.

The information used during the double materiality assessment included internal and external data sources, stakeholder engagement and the identification of relevant industry trends. The double materiality assessment covered all ROMGAZ Group operations, including impacts, risks and opportunities for subsidiaries and branches.

The following material topics resulted from the company's double materiality assessment:

Topic		Sub-topic	Sub-sub-topic
E1	Climate change	Climate change adaptation	Climate change adaptation
E1	Climate change	Energy	Energy efficiency
E2	Pollution	Pollution of air	Pollution of air
E3	Water and marine resources	Water	Water consumption
E3	Water and marine resources	Marine resources	Water discharges
E5	Circular economy	Resources inflows, including resource use	Resources inflows, including resource use
E5	Circular economy	Waste	Waste
S1	Own workforce	Working conditions	Secure employment
S1	Own workforce		Adequate wages
S1	Own workforce	Equal treatment and opportunities for all	Health and safety
S1	Own workforce		Gender equality and equal pay for work of equal value
S1	Own workforce		Training and skills development
S1	Own workforce		Measures against violence and harassment in the workplace
S4	Consumers and end-users		Information-related impacts for consumers and/or end-users
G1	Business conduct	Corporate culture	Corporate culture
G1	Business conduct	Corruption and bribery	Prevention and detection, including training

The scores given to each topic are included in the double materiality matrix presented below:



While some ESRS sub-topics have emerged as being placed below the established materiality threshold, the Company ensures that the key elements are addressed in other material topics.

For example, considering the applicable legislative regulations, internal policies and procedures, as well as the Company's non-incident history of hazardous substances and environmental pollution, the sub-topic of the use of substances of concern (ESRS E2) was not considered material to ROMGAZ Group. However, issues relating to methane gas and its storage in SEVESO are treated as a process safety issue within ESRS S1 – Health and Safety and ESRS E1 Climate Change.

Biodiversity has been identified as a relevant topic for ROMGAZ primarily due to the impacts, risks, and opportunities associated with climate change caused by greenhouse gas emissions, land use changes, and pollution, which can disrupt natural habitats and species' life cycles. The assessment took into account the impacts of its own activities and the value chain on biodiversity. Activities, such as drilling and construction, can cause habitat loss and damage to local flora and fauna, and land use change can have negative effects on biodiversity. ROMGAZ Group complies with national and European legislation on environmental and biodiversity impact assessments, including requirements for protected sites such as Natura 2000. The company assesses the systemic risks associated with climate change, which may affect ecosystems and operations in the long term. The decarbonization plan will contribute to the protection and restoration of ecosystems. The company operates in sensitive areas for biodiversity, including near the Natura 2000 site. Impact mitigation measures are implemented in accordance with national and European legislation (Directive 92/43/EEC and Directive 2009/147/EC). Although the ROMGAZ Group has not used scenario analyses for biodiversity to date, the company recognizes their importance and intends to integrate them into future assessments. Following the double materiality analysis, none of the impacts, risks, or opportunities associated with biodiversity and ecosystems were found to be material.

The sub-topics on protection of whistle-blowers and incidents are integrated into the company's strategic and policy papers in a unitary manner, and although they have not met the materiality threshold, they will indirectly be addressed in the material sub-topic Corporate Culture (ESRS – G1).

Based on the sector benchmarking as part of the double materiality assessment and on the internal evaluation, the topic of Affected Communities (S3) is not currently material for ROMGAZ Group.

However, community-related issues are included in ESRS E2, ESRS E3 and ESRS E5, since affected communities are involved in the process of obtaining environmental permits for ROMGAZ Group.

ROMGAZ Group's executive management team was informed about the results of the double materiality assessment process.

#### **1.4.2 IRO-2: Disclosure requirements in ESRS covered by the undertaking's sustainability statement**

The list of information requirements, together with the number of the page where they are to be found (content index) and the table of all data points stemming from other EU legislation (Appendix B, ESRS 2) are set out below.

The material topics were identified by using the double materiality assessment described in section IRO -1.

ESRS	Disclosure requirement	Description	Page
ESRS 2	BP-1	General basis for preparation of sustainability statements	5
ESRS 2	BP-2	Disclosures in relation to specific circumstances	6
ESRS 2	GOV-1	The role of the administrative, management and supervisory bodies	7
ESRS 2	GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	14
ESRS 2	GOV-3	Integration of sustainability-related performance in incentive schemes	15
ESRS 2	GOV-4	Statement on due diligence	15
ESRS 2	GOV-5	Risk management and internal controls over sustainability reporting	17
ESRS 2	SBM-1	Strategy, business model and value chain	17
ESRS 2	SBM-2	Interests and views of stakeholders	24
ESRS 2	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	25
ESRS 2	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	26
ESRS 2	IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	32
ESRS E1	ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	56
ESRS E1	E1-1	Transition plan for climate change mitigation	56
ESRS E1	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	57
ESRS E1	ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	58
ESRS E1	E1-2	Policies related to climate change mitigation and adaptation	63
ESRS E1	E1-3	Actions and resources in relation to climate change policies	63
ESRS E1	E1-4	Targets related to climate change mitigation and adaptation	68
ESRS E1	E1-5	Energy consumption and mix	69
ESRS E1	E1-6	Gross Scope 1, 2, 3 and Total GHG emissions	70
ESRS E1	E1-7	GHG removals and GHG mitigation projects financed through carbon credits	78
ESRS E1	E1-8	Internal carbon pricing	79
ESRS E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	79
ESRS E2	IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	80
ESRS E2	E2-1	Policies related to pollution	82
ESRS E2	E2-2	Actions and resources related to pollution	84
ESRS E2	E2-3	Targets related to pollution	86
ESRS E2	E2-4	Pollution of air, water and soil	87
ESRS E2	E2-6	Anticipated financial effects from pollution-related impacts, risks and opportunities	88
ESRS E3	ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	89
ESRS E3	E3-1	Policies related to water and marine resources	91
ESRS E3	E3-2	Actions and resources related to water and marine resources	92
ESRS E3	E3-3	Targets related to water and marine resources	99

ESRS	Disclosure requirement	Description	Page
ESRS E3	E3-4	Water consumption	101
ESRS E3	E3-5	Anticipated financial effects of impacts, risks and opportunities related to water and marine resources	102
ESRS E5	ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	103
ESRS E5	E5-1	Policies related to resource use and circular economy	106
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ESRS G1	ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	150
ESRS G1	G1-1	Corporate culture and business conduct policies and corporate culture	153
ESRS G1	G1-3	Prevention and detection of corruption and bribery	156
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Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS 2 GOV-1 Board's gender diversity paragraph 21(d)	Indicator No. 13 of Table 1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		8
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21(e)			Delegated Regulation (EU) 2020/1816, Annex II		8
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator No. 10 Table 3 of Annex 1				15
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40(d)(i)	Indicators No 4 Table 1 of Annex 1	Article 449a of Regulation (EU) No. 575 / 2013; Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II		17
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40(d)(ii)	Indicator No. 9, Table 2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40(d)(iii)	Indicator No. 14, Table 1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) of Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to the cultivation and production of tobacco paragraph 40(d)(iv)			Delegated Regulation (EU) 2020/1818, Article 12(1) of Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	The company has not adopted a transition plan
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16(g)		Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Article 12.1 (d) to (g), and Article 12.2		Not applicable
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator No. 4 Table 2 of Annex 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book-Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		68



Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS E1-5 Energy consumption from fossil sources disaggregated by source (only high climate impact sectors) paragraph 38	Indicator No. 5, Table 1 and Indicator No. 5, Table 2 of Annex 1				69
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator No. 5, Table 1 of Annex 1				69
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator No. 6, Table 1 of Annex 1				70
ESRS E1-6 Gross Scope 1, 2, 3 and total GHG emissions paragraph 44	Indicators No. 1 and 2, Table of Annex 1	Article 449a; Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), Article 6 and Article 8(1)		74
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators No. 3, Table 1 of Annex 1	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book - Climate change transition risk: alignment indicators	Delegated Regulation (EU) 2020/1818, Article 8(1)		78
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	The company does not use carbon credits
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS E1-9		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Not calculated
Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66(a)					
ESRS E1-9					
Location of significant assets at material physical risk paragraph 66(c).					

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67(c).		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking Book - Climate change transition risk: Loans collateralized by immovable property – Energy efficiency of collateral			Not applicable
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not applicable
ESRS E2-4 Amount of each pollutant listed in Annex II of the Regulation E-PRTR (European Pollutant Release and Transfer Registry) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1				88
	Indicator number 2 Table #2 of Annex 1				
	Indicator number 1 Table #2 of Annex 1				
	Indicator number 3 Table #2 of Annex 1				
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				91
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				92
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material topic
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				101
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				101
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not material topic
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not material topic

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Not material topic
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not material topic
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not material topic
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not material topic
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				114
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				117
ESRS 2- SBM3 - S1 Risk of incidents of forced labor paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Not material topic
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not material topic
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator No. 9 Table 3 and indicator No. 11 Table 1 of Annex I				127
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		126
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Not material topic

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				128
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				130
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		137-138
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				138
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		138
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				138
ESRS S1-17 Incidents of discrimination paragraph 103(a)	Indicator No. 7, Table 3 of Annex I				139
ESRS S1-17 Non-compliance with UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		139
ESRS 2- SBM3 - S2 Significant risk of child labor or forced labor in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Not material topic

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material topic
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Not material topic
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not material topic
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material topic
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material topic
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material topic
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		Not material topic
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material topic
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				143

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law Reference	Page/Rating*
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Article 12(1)		144
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Not material topic
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				153
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Not material topic
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		158-159
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				156

### **1.4.3 MDR-P: Policies adopted to manage material sustainability matters**

Material topics are managed by ROMGAZ Group through a series of policies aimed at preventing, mitigating and solving current and potential material impacts, addressing material risks and/or pursuing significant opportunities. These measures are included in the ROMGAZ Group management systems, which ensure not only compliance with legal requirements but also alignment with international best practice.

The policies in force that are applicable to each material topic and sub-topic identified are presented in the respective section of the Consolidated Sustainability Statement. If there are no policies included in the internal documents, the Company has specified this and provided a timeframe for their adoption.

### **1.4.4 MDR-A: Actions and resources in relation to material sustainability matters**

The actions required for each material ESRS topic are presented in the respective sections of the Consolidated Sustainability Statement. Where available, information on material action plans and Operational Expenditure (OPEX) and/or Capital Expenditure (CAPEX) shall be included.

### **1.4.5 MDR-T: Tracking effectiveness of policies and actions through targets**

The targets for each material ESRS topic are presented in the respective sections of the Consolidated Sustainability Statement. If no targets have been adopted, the relevant sections of the Statement shall present the reasons why they have not been adopted and the timeframe for their adoption.

The metrics are also set out in the Statement section – the ESRS disclosure requirements covered by the Consolidated Sustainability Statement – which centralizes the material topics, disclosure requirements and material datapoints related to material topic and the metrics that ROMGAZ Group is using to assess performance and effectiveness in issues related to material impacts, risks or opportunities.



## 2 Presentation of information to be disclosed according to Article 8 of (EU) Taxonomy Regulation 2020/852

The following sections present the analysis carried out by the ROMGAZ Group, for the reporting of information specific to the economic activities carried out in the financial year 2024 (January 1, 2024 - December 31, 2024), in accordance with Article 8 of Regulation (EU) 2020/852. For this reporting period, ROMGAZ Group has the obligation to report the proportions of eligibility and alignment of economic activities, highlighting their contribution to the six environmental objectives.

### 2.1 Determining the eligibility of ROMGAZ Group's economic activities

The activities carried out by ROMGAZ Group were assessed in relation to each of the three financial indicators (Turnover, CapEx and OpEx) based on the consolidated annual financial statements for the financial year 2024, prepared by the Company's representatives in accordance with the provisions of the Order of the Minister of Finance No. 2844/2016 on Accounting Regulations dated 2016, in compliance with the International Financial Reporting Standards. The financial statements were analysed to identify the eligible economic activities and their eligibility proportions, in accordance with the provisions of the Disclosure Delegated Act No. 2021/2178, and with subsequent communication notices of the European Commission on the interpretation and implementation of certain legal provisions of the EU Taxonomy Regulation and of subsequent Delegated Acts. Double accounting of the values underlying the calculation of the indicators was avoided by eliminating the values of transactions concluded within ROMGAZ Group in accordance with the requirements of IFRS 10 Consolidated Financial Statements, paragraph B86.

To identify the eligible economic activities, a comprehensive screening of its portfolio of activities has been performed, for the eight branches and two subsidiaries of ROMGAZ Group, against both their description, as well as the NACE codes, for comparison with the activities outlined in Annexes I and II of the Delegated Act 2021/2139 and Annexes I - IV of the Delegated Act 2023/2486.

In order to present comparative data, the methodological approach established for 2024 was also applied to the data for 2023. Thus, the following changes were made for 2023:

For CAPEX, in the 2023 taxonomy report, the total included only the capital expenditures of Iernut, which was considered an eligible activity. Therefore, the percentage of current year reporting related to eligible activities for fiscal year 2023 has changed as follows:

- CCM 7.4 from 0.03% of total CAPEX eligibility to 0.01% eligibility of total CAPEX;
- CCM 4.29 "Electricity generation from fossil fuels" from 7.76% of total CAPEX eligibility to 4.12% of total CAPEX.

In the 2023 Taxonomy Report, the OPEX KPIs presented did not take into account all expense accounts as defined in Article 8 of the Taxonomy Regulation No. 852/2020. Therefore, the percentage of current year reporting related to eligible activities for fiscal year 2023 has changed as follows:

- CCM 4.29 "Electricity generation from fossil fuels" from 0.13% eligibility to 14.16% eligibility of total operating expenses;
- CCM 6.6 "Road freight transport services - not identified in the previous year;
- CCM 6.5 "Transport by motorcycles, cars and light commercial vehicles - not identified in the previous year.

#### Turnover

ROMGAZ Group carries out exploration, exploitation, and supply operations for natural gas. The company holds 90.5% of the Romanian underground gas storage market. In addition, ROMGAZ Group has facilities for the production of electricity generated from natural gas.

In 2024, ROMGAZ Group achieved a total turnover of RON 7,929,436,000.00, of which 94,31% was generated by activities specific to the main field of activity, as follows: production and commercialization of natural gas, storage of natural gas and provision of other services or sale of other goods or products - crude oil and well condensate, activities that are not eligible according to the EU Taxonomy.

Following the assessment, the following eligible economic activities were identified, generating a share of 5.69% of the turnover, as described below:

- Electricity generation by SPEE Iernut (NACE code D3511) generated 4.25% (RON 337,044,436.00) of ROMGAZ Group turnover. This activity corresponds from both the perspective of the NACE code and of its description to the activity under 4.29 - Electricity generation from fossil gaseous fuels, identified in Annex I of Delegated Act 2021/2139 as a transitional activity substantially contributing to the environmental objective "Climate change mitigation".
- The activity carried out by STTM Târgu Mureş under NACE code H4941 - Road freight transport, generated 1.44% (RON 114,170,844.00) of ROMGAZ Group's turnover. The activity of STTM corresponds both in terms of NACE code and in terms of description to the activity under 6.6 - Road freight transport services provided for in Annex I of Delegated Act 2021/2139. This is an activity that contributes substantially to the environmental objective "Climate change mitigation".

### Capital expenditure (CapEx)

According to the provisions of Article 1.1.2.2. of Annex I of the Delegated Act No. 2021/2178, CapEx numerator equals to the part of the capital expenditure included in the denominator that is any of the following:

- Related to assets or processes that are associated with Taxonomy-aligned economic activities;
- Part of a plan to expand Taxonomy-aligned economic activities or to allow Taxonomy-eligible economic activities to become Taxonomy-aligned ("CapEx plan");
- Related to the purchase of output from Taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions, notably activities listed in points 7.3 - 7.6 of Annex I to the Climate Delegated Act, as well as other economic activities listed in the delegated acts adopted pursuant to Regulation (EU) 2020/852 and provided that such measures are implemented and operational within 18 months.

During the 2024 financial year, the total amount of ROMGAZ Group capital expenditure was of RON 3,197,770,000.00, out of which a quota of 92.38% (RON 2,954,017,661.40) represented ineligible capital expenditure, associated to main activities of gas exploitation, deposit and trading.

### A-type CapEx

In 2024, ROMGAZ Group made investments to modernize and re-equip the electricity generation facilities, aiming at increasing the production capacity of SPEE Iernut Subsidiary. Two eligible investments were thus identified:

- Activity 4.29 - Electricity generation from fossil gaseous fuels, representing 7.12% (RON 227,716,784.00) from the total investments accomplished.
- Activity 6.6 - Road freight transport services, representing 0.28% (RON 8,877,400.00) to purchase N1 category vans designated for road freight transportation.

### C-type CapEx

Specific C-type CapEx expenses were also incurred, representing 0.22% (RON 7,158,154.60) of total capital expenditures, associated with the following eligible activities:

- Renovation activities of buildings owned by ROMGAZ Group represented 0.19% of total capital expenditures. This activity may substantially contribute to two environmental objectives: Climate change mitigation (CCM 7.2) and Transition to a circular economy (CE 3.2). To determine the most relevant environmental objective the renovation activity contributes to, the specifics and purpose of the activities performed were analysed. Considering that:
  - building renovation did not aim at improving their energy efficiency,
  - it does not fall under the definition of "major renovation",
  - and it cannot be associated with the implementation of a climate change adaptation plan,

it was concluded that this activity substantially contributes to the environmental objective “Transition to a circular economy”, i.e. the activity under 3.2 - Renovation of existing buildings set out in Annex II of Delegated Act 2023/2486.

- The acquisition of M1-category electric vehicles had a share of 0.025% of total capital expenditure. This is an investment falling under activity 6.5. Transport by motorcycles, cars and light commercial vehicles in Annex I of Delegated Act 2021/2139. Therefore, it significantly contributes to the environmental objective “Climate change mitigation”.

The acquisition and installation of electric vehicle charging stations were an investment made at Depogaz subsidiary, representing 0.005% of ROMGAZ Group’s total capital expenditure. This investment falls under activity 7.4. - Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces adjacent to buildings) as provided for in Annex I of Delegated Act 2021/2139. Therefore, it contributes to the environmental objective of “Climate change mitigation”.

### **Operating expenditure (OpEx)**

According to Article 1.1.3.1 of Annex I of Delegated Act 2021/2178, the denominator of operating expenses shall cover direct non-capitalized costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of property, plants and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets.

Non-financial undertakings that apply national GAAP (Generally Accepted Accounting Principles) and are not capitalizing right-of-use assets shall include lease costs in the OpEx in addition to the costs listed in the paragraph above.

To identify operating expenses in accordance with these criteria, a comprehensive screening of the financial statements was performed based on the provisions of Delegated Act 2021/2178, as well as subsequent Communication Notes of the European Commission: 2022/C 385/01 (FAQ12 - 2022/C 385/01) and C/2023/305 (FAQ34 - C/2023/305). The purpose of the screening was to identify the operating expenses that correspond to the definition of the OpEx denominator, from the expenses recorded in the **Other expenses** category in accounting accounts 611, 612, 624, 6024, 628, respectively the **Personnel expenses** category in accounts 641, 642 and 645.

Thus, the value of the OpEx denominator determined from the total operating expenses recorded at ROMGAZ Group level in 2024 was of RON 201,528,076.28. Based on the specific categories of the OpEx numerator, the following eligible expenses were identified, associated with assets or processes related to taxonomy eligible or aligned economic activities:

- Operating expenses related to electricity production at SPEE Iernut, representing 10.31% of total operating expenses. This falls under activity 4.29 - Electricity generation from fossil gaseous fuels.
- Maintenance and repair expenses of commercial vehicles owned and used by the STTTM Branch in road freight transport, representing 0.49% of total operating expenses. This is included in activity 6.6 - Road freight transport services.
- Maintenance and repair expenses for M1 category vehicles, accounting for 1.64% of total operational expenses. These expenses are associated with activity 6.5 - Transport by motorbikes, passenger cars and light commercial vehicles.

The remaining operating expenses, related to the main activities of production, marketing and storage of natural gas, represent 87.57% of total operating expenses and are ineligible.

## **2.2 Determining ROMGAZ Group’s eligible economic activities taxonomy-alignment**

To be considered “aligned”, eligible economic activities must substantially contribute to at least one of the six environmental objectives set in Article 9 of the EU Taxonomy Regulation (Regulation 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, must not significantly damage any of the other environmental objectives, and comply with the social minimum safeguards set in Article art. 18 of the Regulation.

The assessment of eligible economic activities to determine their alignment ratio was accomplished for the activities that substantially contribute to the environmental objectives *Climate change mitigation* and *Transition to a circular economy*, based on the technical screening criteria set by Delegated Acts 2021/2139 and 2023/2486 respectively, as well as based on the screening criteria set for the 4 applicable fields regarding the minimum social safeguards: *human rights, anti-corruption, tax governance, and fair competition*.

Following the assessment performed based on technical screening criteria, it was noted that these have not been entirely complied with, and consequently the eligible activities performed by ROMGAZ Group in 2024 cannot be considered EU taxonomy aligned. Given this, the company has not officially assessed whether it meets the minimum social criteria in accordance with the EU Taxonomy Regulation 2020/852. The company's social aspects are reported in Section S1 of the ESRS report.

## 2.3 Disclosure of ROMGAZ Group's key performance indicators for the 3 financial indicators

### Turnover:

The denominator represents the net turnover obtained during the 2024 financial exercise, according to the consolidated profit and loss account according to the Order of the Minister of Public Finances No. 2844/2016 as further amended and completed [please refer to the Annual consolidated financial statements, Note 3].

The numerator representing the proportion from the turnover obtained from EU Taxonomy aligned activities is equal to 0 RON, thus resulting an alignment ratio of 0% from the total Turnover.

### Capital expenditure (CapEx):

The denominator represents the total capital expenditure accomplished during the 2024 financial exercise, according to the Order of the Minister of Public Finances No. 2844/2016 as further amended and completed [please refer to the Annual consolidated financial statements, Note 12].

The numerator, including the capital expenditure related to assets or processes associated with EU Taxonomy aligned activities, is equal to 0 RON, thus resulting a ratio of 0% from the total capital expenditure.

### Operating expenditure (OpEx):

The denominator represents the total operating expenditure corresponding to the 2024 financial exercise, determined according to the definition of this indicator set in Article 1.1.3.1 of Annex I of Delegated Act 2021/2178.

The numerator, including operating expenditure associated to certain EU Taxonomy aligned activities, equals to 0 RON, thus resulting an alignment ratio of 0% from the operating expenditure.

The assessment results of ROMGAZ Group's economic activities for 2024 are described in the sections below, according to the drafts set in Annex V of Delegated Act 2023/2486.

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities - disclosure covering year 2024

Financial year 2024	2024			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Minimum Safeguards	Proportion of Taxonomy- aligned (A.1.) or -eligible (A.2.) turnover, year 2023	Category enabling activity	Category transitional activity	
	Economic Activities	Code	Turnover	Proportion of CapEx	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy					Biodiversity
					Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N					Y/N
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																				
-	-	-	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.00%	-	-	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N	N	N	N	N	N	N	0.00%			
Of which enabling		-	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N	N	N	N	N	N	N	0.00%	E		
Of which transitional		-	0.00%	0.00%						N	N	N	N	N	N	N	0.00%		T	
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
				EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;											
Electricity generation from fossil gaseous fuels	CCM 4.29	337,044,436.00	4.25%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								4.46%			
Freight transport services by road	CCM 6.6	114,170,844.00	1.44%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.00%			
Turnover of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		451,215,280.00	5.69%	5.69%	0.00%	0.00%	0.00%	0.00%	0.00%								4.46%			
Turnover of Taxonomy-eligible activities (A.1+A.2)		451,215,280.00	5.69%	5.69%	0.00%	0.00%	0.00%	0.00%	0.00%								4.46%			
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
Turnover of Taxonomy- non-eligible activities		7,478,220,720.00	94.31%																	
<b>TOTAL (A + B)</b>		<b>7,929,436,000.00</b>	<b>100%</b>																	

**Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities - disclosure covering year 2024**

Financial year 2024	2024			Substantial contribution criteria							DNSH criteria ("Does Not Significantly Harm")					Minimum Safeguards	Proportion of CapEx - aligned (A.1.) or -eligible (A.2.) CapEx, year 2023	Category enabling activity	Category transitional activity
Economic Activities	Code	CapEx	Proportion of CapEx	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity				
		RON	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
-	-	-	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.00%	-	-
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	<b>0.00%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	N	N	N	N	N	N	N	<b>0.00%</b>		
Of which enabling		-	<b>0.00%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	N	N	N	N	N	N	N	<b>0.00%</b>	E	
Of which transitional		-	<b>0.00%</b>	<b>0%</b>						N	N	N	N	N	N	N	<b>0.00%</b>		T
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
				EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;										
Electricity generation from fossil gaseous fuels	CCM 4.29	227,716,784.00	7.12%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								4.12%		
Freight transport services by road	CCM 6.6	8,877,400.00	0.28%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Renovation of existing buildings	CE 3.2 CCM 7.2	6,039,858.28	0.19%	EL	N/EL	N/EL	N/EL	EL	N/EL								0%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	919,296.32	0.03%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	199,000.00	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.01%		
<b>CapEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>243,752,338.60</b>	<b>7.62%</b>	<b>7.43%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.20%</b>	<b>0.00%</b>										
<b>CapEx of Taxonomy-eligible activities (A.1+A.2)</b>		<b>243,752,338.60</b>	<b>7.62%</b>	<b>7.43%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.20%</b>	<b>0.00%</b>										
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
CapEx of Taxonomy- non-eligible activities		<b>2,954,017,661.40</b>	<b>92.38%</b>																
<b>TOTAL (A + B)</b>		<b>3,197,770,000.00</b>	<b>100.00%</b>																

	CapEx/Total CapEx ratio	
	Aligned in terms of taxonomy per objective	Eligible in terms of taxonomy per objective
CCM	0.00%	0.00%
CCA	0.00%	0.00%
WTR	0.00%	0.00%
CE	0.00%	0.20%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

This version of the Consolidated Sustainability Statement is a translation from the original material, which was prepared in Romanian. All possible care has been taken to ensure that the translation is an accurate representation of the original text. However, in all matters of interpretation of information, views or opinions, the original language version of our Consolidated Sustainability Statement takes precedence over this statement.

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities - disclosure covering year 2024

Financial year 2024	2024			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Minimum Safeguards	Proportion of OpEx - aligned (A.1.) or -eligible (A.2.) OpEx, year 2023	Category enabling activity	Category transitional activity
Economic Activities	Code	OpEx	Proportion of OpEx	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
-	-	-	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.00%	-	-
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N	N	N	N	N	N	N	0.00%		
Of which enabling		-	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N	N	N	N	N	N	N	0.00%	E	
Of which transitional		-	0.00%	0.00%						N	N	N	N	N	N	N	0.00%		T
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
				EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;	EL; N/EL;										
Electricity generation from fossil gaseous fuels	CCM 4.29	20,775,931.49	10.31%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								14.16%		
Freight transport services by road	CCM 6.6	979,066.48	0.49%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.49%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	3,297,891.82	1.64%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								2.43%		
<b>OpEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>25,052,889.79</b>	<b>12.43%</b>	<b>12.43%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>								<b>17.08%</b>		
<b>OpEx of Taxonomy-eligible activities (A.1+A.2)</b>		<b>25,052,889.79</b>	<b>12.43%</b>	<b>12.43%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>0.00%</b>								<b>17.08%</b>		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy - non-eligible activities		<b>176,475,186.49</b>	<b>87.57%</b>																
<b>TOTAL (A + B)</b>		<b>201,528,076.28</b>	<b>100.00%</b>																



Disclosure of information set in Article 8 paragraphs (6) and (7) regarding nuclear and fossil gas related activities (according to the template set in Annex III of Delegated Act 2022/1214).

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

## Taxonomy-aligned economic activities (denominator)

### Taxonomy-aligned economic activities (denominator): Turnover

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of Turnover	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of Turnover	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of Turnover	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of Turnover	-	0%	-	0%	-	0%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of Turnover	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of Turnover	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the Turnover</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>
8	<b>Total Turnover</b>	<b>7,929,436,000.00</b>	<b>100%</b>	<b>7,929,436,000.00</b>	<b>100%</b>	-	<b>0%</b>

### Taxonomy-aligned economic activities (denominator): CapEx

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	-	0%	-	0%	-	0%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the CapEx</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>
8	<b>Total CapEx</b>	<b>3,197,770,000.00</b>	<b>100%</b>	<b>3,197,770,000.00</b>	<b>100%</b>	-	<b>0%</b>

## Taxonomy-aligned economic activities (denominator): OpEx

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	-	0%	-	0%	-	0%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the OpEx</b>	-	0%	-	0%	-	0%
8	<b>Total OpEx</b>	<b>201,528,076.28</b>	<b>0%</b>	<b>201,528,076.28</b>	<b>0%</b>	-	<b>0%</b>

## Taxonomy-aligned economic activities (numerator)

### Taxonomy-aligned economic activities (numerator): Turnover

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the Turnover	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the Turnover	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the Turnover	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the Turnover	-	0%	-	0%	-	0%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the Turnover	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the Turnover	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the Turnover</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the Turnover</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>

### Taxonomy-aligned economic activities (numerator): CapEx

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CapEx	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CapEx	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CapEx	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CapEx	-	0%	-	0%	-	0%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CapEx	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the CapEx	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the CapEx</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the CapEx</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>

## Taxonomy-aligned economic activities (numerator): OpEx

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OpEx	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OpEx	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OpEx	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OpEx	-	0%	-	0%	-	0%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OpEx	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the OpEx	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the OpEx</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>
8	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the OpEx</b>	-	<b>0%</b>	-	<b>0%</b>	-	<b>0%</b>

## Taxonomy-eligible but not taxonomy-aligned economic activities

### Taxonomy-eligible but not taxonomy-aligned economic activities: Turnover

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the Turnover	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the Turnover	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the Turnover	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the Turnover	337,044,436.00	4.25%	337,044,436.00	4.25%	-	0%
5	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the Turnover	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the Turnover	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the Turnover</b>	<b>114,170,844.00</b>	<b>1.44%</b>	<b>114,170,844.00</b>	<b>1.44%</b>	-	<b>0%</b>
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the Turnover</b>	<b>451,215,280.00</b>	<b>5.69%</b>	<b>451,215,280.00</b>	<b>5.69%</b>	-	<b>0%</b>

## Taxonomy-eligible but not taxonomy-aligned economic activities: CapEx

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CapEx	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CapEx	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CapEx	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CapEx	227,716,784.00	7.12%	227,716,784.00	7.12%	-	0%
5	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CapEx	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the CapEx	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the CapEx</b>	<b>16,035,554.60</b>	<b>0.50%</b>	<b>16,035,554.60</b>	<b>0.50%</b>	-	<b>0%</b>
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the CapEx</b>	<b>243,752,338.60</b>	<b>7.62%</b>	<b>243,752,338.60</b>	<b>7.62%</b>	-	<b>0%</b>

## Taxonomy-eligible but not taxonomy-aligned economic activities: OpEx

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount (RON)	%	Amount (RON)	%	Amount (RON)	%
1	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OpEx	-	0%	-	0%	-	0%
2	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OpEx	-	0%	-	0%	-	0%
3	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OpEx	-	0%	-	0%	-	0%
4	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OpEx	20,775,931.49	10.31%	20,775,931.49	10.31%	-	0%
5	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OpEx	-	0%	-	0%	-	0%
6	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the OpEx	-	0%	-	0%	-	0%
7	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the OpEx</b>	<b>4,276,958.30</b>	<b>2.12%</b>	<b>4,276,958.30</b>	<b>2.12%</b>	-	<b>0%</b>
8	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the OpEx</b>	<b>25,052,889.79</b>	<b>12.43%</b>	<b>25,052,889.79</b>	<b>12.43%</b>	-	<b>0%</b>

## Taxonomy non-eligible economic activities

Rând	Activități economice	Turnover		CapEx		OpEx	
		Amount [RON]	Percentage [%]	Amount [RON]	Percentage [%]	Amount [RON]	Percentage [%]
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0%	0	0%	0	0%
7	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>7,478,220,720.00</b>	<b>94.31%</b>	<b>2,954,017,661.40</b>	<b>92.38%</b>	<b>176,475,186.49</b>	<b>87.57%</b>
8	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'</b>	<b>7,478,220,720.00</b>	<b>94.31%</b>	<b>2,954,017,661.40</b>	<b>92.38%</b>	<b>176,475,186.49</b>	<b>87.57%</b>



### 3 ESRS E1 - Climate change

#### 3.1 Governance

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

During 2024, a [Remuneration Policy](#) was applicable to ROMGAZ Group, providing for a fixed and variable remuneration component for its administrators and directors. Detailed information on the policy may be found in ESRS 2 GOV 3: Integration of sustainability - related performance in incentive scheme page 14.

According to the policy, the performance indicators for directors and administrators may include targets related to the reduction of CO<sub>2</sub> emissions, and their variable remuneration shall reflect the progress in achieving these objectives. The targets are set annually. Specifically, the variable component for 2024 is linked to the CO<sub>2</sub> emissions reduction target that was set during the GSM Meeting of September 2023, which was set as follows:

Emissions from scope 1t ( $I_{E1t}$ ) - reduction/maintenance of CO<sub>2</sub> specific emissions directly generated by electricity production facilities of Iernut Thermal Power Plant.

Calculation method:  $I_{E1t_n} = 1 - \frac{CO2_{Rn} - CO2_{An}}{CO2_{An}}$ ,

where:

$CO2_{Rn}$  - CO<sub>2</sub> specific emissions generated during year “n” [tCO<sub>2</sub>/MWh electricity generated]: emission of CO<sub>2</sub> corresponding to the electricity generated;

$CO2_{An}$  - maximum CO<sub>2</sub> specific emissions undertaken for year “n” [tCO<sub>2</sub>/MWh electricity generated, as follows:

2023	2024	2025	2026	2027
0.570	0.565	0.360	0.360	0.360

The indicator “Emissions from scope 1t ( $I_{E1t}$ )” has a weight of 3% of the total performance indicators established for both non-executive and executive administrators and directors.

The maximum CO<sub>2</sub> specific emissions undertaken for the year “n” (2024) [tCO<sub>2</sub>/MWh electricity generated] was 0.565.

Climate considerations, including the specific emission reduction targets, are not yet aligned with the ESRS requirements, and ROMGAZ Group intends to develop and approve a decarbonization / transition plan based on climate scenarios and aligned with the Paris Agreement requirements during 2025. Once this decarbonization plan will be adopted, the GHG emission reduction objectives set in the Remuneration Policy will also be aligned.

#### 3.2 Strategy

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

###### Romgaz

The Transition Plan for Climate Change Mitigation (Integrated Transition/Decarbonization Plan) is part of Romgaz's priorities for 2025 for development and approval, in accordance with the requirements of ESRS E1-Climate Change. Even if in the reporting year 2024, the company did not actually adopt an integrated transition/decarbonization plan, Romgaz adopted measures focused on reducing the carbon footprint, these being related to specific projects. They derive from the Romgaz Strategy which provides indicative directions on the Decarbonization Policy. Detailed information is included in ESRS section E1-3.

###### Depogaz

Depogaz does not currently have a transition plan complying with ESRS E1 - Climate change but intends to develop and approve such a plan in 2026.

## RBS

Neptun Deep project, implemented by RBS with a 50% participation (described in ESRS 2 Section), is compatible with Romania's trajectory to achieve climate neutrality by 2050.

For this project, GHG emissions were estimated for the construction, operation and decommissioning phases, in the Environmental Impact Assessment stage, in relation to RCP 2.6, RCP 4.5, RCP 6.0 and RCP 8.5 trajectories. The Impact Assessment aimed at quantifying the project's emissions, in relation to Romania's GHG reduction targets.

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

ROMGAZ Group's activity is directly linked to the challenges and opportunities generated by the transition to a low-carbon economy. The production and supply of natural gas, along with other activities in the value chain, influence greenhouse gas emissions, but also offer solutions for a sustainable transition.

Until now, ROMGAZ Group has not performed a quantitative resilience analysis based on climate scenarios but has only performed a qualitative a resilience assessment according to the material impacts, risks and opportunities and their interaction with the strategy and business model.

Therefore, during 2024, a process to identify and address physical and transition climate risks was initiated. Thus:

- The elaboration of a decarbonization plan taking into account ESRS E1 - Climate change provisions was initiated; this will also include actions and measures to implement the provisions of the Regulation for the Monitoring and Reduction of Methane Emissions (REM), noting that the implementation of the regulation at Romgaz level has a high degree of complexity due to the size of the existing infrastructure owned by the Company.
- The development of a study to identify the climate and resilience Risks and Vulnerabilities was planned, also including their quantitative assessment, in accordance with the ESRS requirements and water risks exposure assessment.
- The double materiality assessment process was performed, identifying at the highest level the climate risks considered when identifying the Company's impacts and opportunities, which were to be subsequently linked to a decarbonization plan aligned with ESRS E1 - Climate change requirements. For this high-level analysis, it was taken into account that the regulations regarding the limitation of GHG emissions will have an impact on ROMGAZ Group's business model and in this regard the Company is to adopt some measures so that the resilience plan takes into account these pressures and aligns the strategic planning with the time horizons applicable to the ESRS.

The Integrated National Plan for Energy and Climate Change (PNIESC 2021 - 2030) and the Energy Strategy of Romania (2025-2035, with a view towards 2050) are national strategic documents that align Romania's energy and climate priorities with the European Union's climate neutrality objectives.

According to both documents, natural gas, and implicitly ROMGAZ Group which has a significant market share, have an indispensable role in Romania's energy mix and will remain a crucial energy source for the coming period.

The two national strategic documents specify that Romania will prioritize the support given to the establishment of additional electricity capacities that use natural gas, as transitional fuel towards a low-carbon economy. This confirms the resilience of ROMGAZ Group's business model for the 2025-2035-time horizon with a view towards 2050, according to national strategies.

The current site-level development project based approach allows for the anticipated financial effects of climate risks to be taken into account at the investment level, with costs being incorporated into the annual "Investment Plan" for each project. The Company assesses that at this time there are no risks to securing investment capital in the short, medium and long term for the implementation of the GHG emission reduction programs proposed through the "Investment Plan".

### 3.3 Impact, risk and opportunity management

#### 3.3.1 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities

For the reporting year, ROMGAZ Group did not put in place a process to assess climate-related impacts, risks and opportunities based on climate scenarios but carried out a qualitative assessment.

Thus, through the double materiality assessment carried out in 2024, ROMGAZ Group identified and assessed the related climate impacts and risks, including opportunities for its own operations and the value chain in a qualitative manner, under the most unfavorable climate scenario. These risks were identified as:

- Physical climate-related risks:
  - Extreme temperatures and severe weather events that may affect ROMGAZ Group infrastructure (e.g. offices, production units) and its operational efficiency, generating additional costs through increased insurance premiums, possible decrease in revenues, the need for investments for re-operation or adaptation etc;
  - Extreme weather events (heatwaves, cold spells) with a negative impact on operational continuity such as shutdowns or changes to the operating schedule to allow the workforce to adapt to the new weather conditions;
  - On a case-by-case basis, for certain sites, depending on their location, risks related to wildfires or floods may arise, but they are mitigated through business continuity plans, along with other physical risks related to climate.
- Climate-related transition risks:
  - Legislative changes and strict regulations on GHG emissions. Possible carbon taxes and legislative adjustments that may generate additional costs and affect strategic planning;
  - Market and reputational pressures. Loss of sustainability aware customers and investors if the decarbonization plan is not ambitious enough compared to competitors;
  - Fossil fuels price volatility and market requirements changes towards renewable energy and low-carbon technologies.

Currently, climate-related physical and transition risks:

- Were assessed according to the climate scenarios for Neptun Deep project; it was concluded that the project is compatible with a credible GHG trajectory until 2050, in relation to the climate objectives for the years 2030 and 2050, namely:
  - For the year 2030, the resulting CO<sub>2</sub>eq emissions represent 1.14% of the amount of CO<sub>2</sub> eq established by the neutral Romania scenario;
  - For the year 2050, the CO<sub>2</sub>eq project emission will be zero.
  - The GHG emissions generated by the project are limited, in line with Romania's general objectives for 2030 and 2050, falling within the planned reduction trajectory. Regarding the climate change adaptation, the sensitivity assessment was carried out considering the evolution of climate variables of temperatures and precipitation for Romania. Climate model forecasts include a series of changes in temperature and precipitation patterns, a general trend of aridity and intensification of external events. For the Neptun Deep project, all these elements were considered for all the phases of the project, and all technical and organizational elements of the project were designed and budgeted to ensure its resilience.

In case of Depogaz, for the Bilciurești project, the construction, assembly and operation phase emissions were considered. Based on the assessment carried out, climate change associated risks are considered minimal, according to the low sensitivity level related to climate change exposure. The potential risks identified include emissions of combustion gases and methane during the construction and operation period, but it was concluded that in the long term, the storage activity contributes to national decarbonization efforts (by using gas as a transitional fuel, to replace coal).

The project implementation will trigger an increased security of supply by developing and diversifying natural gas sources in South-Eastern Europe, ensuring better energy independence and covering the risks of interruption of natural gas flows during peak consumption periods relative to different scenarios.

For the other investment projects that required impact assessments, the identification of climate risks was done from a qualitative perspective, taking into consideration only the most unfavorable climate scenarios.

For the rest of the assets, physical climate risks are addressed by the Business Continuity Plan (BCP) which considers:

- Maintaining operational continuity;
- Personnel protection / human resources;
- Minimizing the safety risks and ecological impact;
- Ensuring an efficient communication with all the parties involved;
- Full restoration of operations as soon and efficient as possible in case of shortages.

Additionally, ROMGAZ Group maintains an inventory of GHG emission sources, both current (2024 operations 2024) and future (Neptun Deep project) emissions and through the decarbonization plan, will evaluate the actual and potential impact on the climate, the physical risks in the adaptation process and the transition risks, as well as ROMGAZ Group's financial opportunities.

The double materiality assessment highlighted that the material impact, both positive and negative, is significant for this material topic and its related sub-topics, and the associated risks and opportunities were identified.

The double materiality assessment (DMA) process is described in detail in ESRS 2 - General Disclosures Section. In the absence of a decarbonization plan aligned with ESRS E1 - Climate change requirements, the impacts, risks and opportunities identified are not linked to such a strategy.

The climate-related impacts, risks and opportunities identified as material are detailed below:

## IRO on climate change

### Legend:

Type of impact: F = financial impact, M = material impact, MF = material and financial impact

Time horizon: A = current impact (reporting year), P = potential impact (medium and long term)

Source of impact: S = impact arising from strategy and business model, B = impact underpinning strategy

Material topic and Material sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Climate change <b>Climate change adaptation</b>	Upstream, own activity, downstream	MF	S	P	ROMGAZ Group may have a positive impact on climate by starting the process of developing a decarbonization strategy and a climate change adaptation policy for both its own headquarters / buildings and fleet and for its subsidiaries (as far as possible aligned with the provisions of Paris Agreement).	A, P	Extreme weather events may have a negative impact on the Company's workforce (working in extreme temperature conditions).	Risks to business continuity and infrastructure caused by extreme weather events and higher temperatures (physical risks). Increase in insurance premiums (transition risks).	The company encourages climate change adaptation and mitigation projects (see measures sections) by implementing green energy projects.
Climate change <b>Climate change mitigation</b>	Upstream, own activity, downstream	MF	S	P	Through the investment programs carried out, ROMGAZ Group already contributes to mitigating climate change by: -modernizing and re-technologizing equipment in operational production to reduce methane emissions. In this way, the impact on the environment and people is reduced.  Increasing the efficiency of the companies' vehicle portfolio by gradually replacing existing vehicles with hybrid, plug-in/electric models can contribute to	A,P	ROMGAZ Group's business model has a negative impact on the environment through GHG emissions resulting from its own activity or from the value chain.  ROMGAZ Group's GHG emissions contribute to the greenhouse effect that generates climate change (both its own emissions and from the value chain).  The lack of an internal program to address the management of carbon emissions from the value chain, currently generates a higher negative impact because suppliers are not	Significant financial and operational effort to align ROMGAZ Group's objectives with requirements at national level (e.g., Romania's Long-Term Strategy; Romania's Integrated National Energy and Climate Change Plan 2021-2030; Romania's Energy Strategy 2022-2030 with a 2050 perspective; Romania's National Hydrogen Strategy and Action Plan 2023-2030; National Gas Transmission System Development Plan 2024-2033; Romania's National Recovery and Resilience Plan) and at international/European	

					<p>reducing GHG emissions and implicitly mitigating climate change.</p> <p>ROMGAZ Group contributes to mitigating climate change by monitoring atmospheric pollutants, according to the requirements of environmental permits, which allowed for a good level of compliance to be established so far.</p> <p>ROMGAZ Group contributes to mitigating climate change through proactive (not reactive) maintenance plans that allow the reduction of accidental GHG losses.</p>		<p>encouraged to reduce their GHG emissions.</p>	<p>level (Paris Agreement, European Green Deal) (transition risk).</p> <p>Financial risks associated with possible carbon taxes (transition risk). Local development of CO<sub>2</sub> storage is slow.</p> <p>National infrastructure adaptation and technology acceptance by customers and communities is necessary (transition risk) without which ROMGAZ Group cannot move forward with local CCS projects (transition risk). Risks of losing customers interested in sustainability and public image (transition risks).</p>	
<p>Climate change</p> <p><b>Energy</b></p>	Own activity	MF	S	A, P	<p>Identify and implement solutions to reduce energy consumption of administrative buildings and increase energy efficiency: solar energy systems for self-consumption and thermal insulation of administrative buildings.</p> <p>ROMGAZ Group's initiatives to reduce energy consumption will have a positive impact on the company's carbon footprint and contribute to mitigating climate change.</p> <p>Increase trust among communities by</p>	A, P	<p>Fossil fuel-based energy contributes to GHG emissions and promotes climate change.</p> <p>Rising fossil fuel prices.</p> <p>Avoidance by financiers of investments in technologies/companies that generate GHGs.</p>	<p>Inefficient use of energy or failure to use renewable fuel can increase operational costs or those of value chain partners. (transition risk). Volatility in fossil fuel prices and changing market demands for renewable energy and low-emission technologies (transition risk).</p>	<p>Increasing attractiveness to investors by demonstrating commitment to sustainability and increasing customer satisfaction and loyalty.</p>

					promoting the importance of energy efficiency.				
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The company did not use climate scenario assessment to determine the IROs.

The double materiality assessment took into consideration ROMGAZ Group’s business model and strategy; thus GHG emissions may arise from its own operations as well as from the value chain. Other climate-related impacts that were assessed are those related to meteorological events and temporary land use change but this impact was assessed as insignificant, while those related to water risks are addressed in ESRS E3 - Water and marine resources Sections.

Total GHG emissions are calculated and presented in E 1-6.



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

As this is the first year of reporting in accordance with ESRS, ROMGAZ Group does not have dedicated policies for climate change mitigation or adaptation, nor for energy efficiency. The company intends to update its policies addressing these topics but has not set a deadline for this process.

#### Romgaz

Romgaz maintains the certification of an integrated management system for environment, quality, occupational health and safety (IMS) to ensure environmental compliance, including policies, procedures, and responsibilities, particularly for emissions management. This system is supported by the Policy Statement on Quality, Environment, Health, and Occupational Safety issued by the General Director of Romgaz who is responsible for its implementation.

The monitoring and reporting of greenhouse gas (GHG) emissions are regulated through specific instructions to ensure that emissions remain within legally permitted limits. Significant environmental aspects (including GHG emissions) are integrated into the "Centralized Objectives Document," while the necessary resources are included in the "Annual Investment Plan" and the "Annual Procurement Plan."

Through the "Administration Plan," three strategic directions have been identified: reducing carbon and methane emissions and implementing projects for renewable energy production.

The current measures provide a transitional framework for managing climate-related risks and opportunities until the decarbonization plan is developed in 2025.

#### Depogaz

Currently, Depogaz does not have dedicated policies for climate change mitigation or adaptation and has not set a deadline for their development. However, the company has an Energy Policy Statement aimed at reducing energy consumption and, consequently, reducing GHG emissions.

Nevertheless, in accordance with current legal requirements, for development projects or modifications to existing sites, the environmental impact assessment process also requires climate risk and vulnerability evaluations. So far, for the projects analyzed, no additional measures have been deemed necessary to enhance site resilience.

#### RBS

RBS currently carries out office activities and is in the process of developing a system of policies, procedures, and instructions aligned with the specific nature of its current operations. This system is being developed in stages as part of a continuous process of growth and improvement, aligned with both the company's current and future business needs. At this time, there are no specific policies covering the identified material topics, as the nature of office activities and the scale of operations do not justify the existence of such policies.

For the Neptun Deep Project, as part of the impact assessment procedures, climate risks and vulnerabilities have been identified and mitigated from the design phase to ensure the project's resilience.

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

#### Romgaz

Although there is no transition plan in place at this time, the [Administration Plan](#) approved by the GMS in September 2023 includes a series of measures and actions aimed at reducing GHG emissions, which are presented in the table below.

GHG reductions have not been quantified for all implemented measures - for details, please refer to the table below.

Considering that for 2024, the identified activities are not yet aligned with the technical criteria of the EU Taxonomy, the capital and operational expenditures are included in the Annual Investment Plan and the consolidated financial statements.

Romgaz has identified and implemented a series of actions for energy efficiency, reducing fugitive methane emissions, mitigating climate change, and adapting to its effects. The measures established for managing the impact of emissions include:

- Operational control;
- Measurement and monitoring of emissions;
- Staff training;
- Conducting annual technical inspections, periodic checks, routine repairs, and major overhauls of work equipment;
- Preventing abnormal situations to limit uncontrolled methane gas losses;
- Procuring high-performance equipment and installations with lower pollution levels;
- Implementing the project: “Development of CTE Iernut by constructing a new combined-cycle gas turbine power plant”;
- Carrying out repairs, replacing defective fittings, and restoring seals (Natural Gas Production Sections);
- Updating and maintaining the "Monitoring-Measurement Register" application;
- Monthly monitoring by the Environmental Protection Service at headquarters, with written notifications sent to the Environmental Protection Service of the branch regarding any missing information in the Monitoring-Measurement Register.

ROMGAZ Group supports the training and professional development of employees regarding the company's objectives for reducing energy consumption and GHG emissions. Training programs are part of the Annual Training and Professional Development Plan. More information about professional training programs can be found in **ESRS S1 - Own Workforce** on page 118.

The main actions undertaken during the reporting year and those planned for the future are presented below:

Romgaz	Action 1	Action 2	Action 3	Action 4	Action 5	Action 6	Action 7
<b>Actions taken and planned</b>	Development of CTE Iernut by constructing a new combined-cycle gas turbine power plant	Parking redevelopment at the Romgaz site Medias, by installing photovoltaic panels	Installation of a photovoltaic system on the building of the pump station - Iernut Branch	Installation of a photovoltaic system on the building of the micro-hydroelectric power station - Iernut Branch	Construction of a approximately 40 MW photovoltaic park at SPEE Iernut	Acquisition of equipment for the detection and measurement of methane emissions	Modernization of the lighting installation at SC Mureş Modernization of the lighting installation at SC Grebeniş Modernization of the lighting installation at SC Sânmărtin
<b>Decarbonization Levers</b>	Reduction of energy consumption due to the use of more efficient technology.	Use of renewable resources	Use of renewable resources	Use of renewable resources	Use of renewable resources	Control and reduce GHG emissions	Reducing energy consumption
<b>Scope of actions</b>	Power generation - own operations - reduce resource use, reduce air pollution, reduce GHG emissions, reduce carbon footprint.	Own activities - ensuring green infrastructure - producing renewable energy - reducing air pollution, reducing GHG emissions.	Own activities - ensuring green infrastructure - producing renewable energy - reducing air pollution, reducing GHG emissions, reducing carbon footprint.	Own activities - ensuring green infrastructure - producing renewable energy - reducing air pollution, reducing GHG emissions, reducing carbon footprint.	Own activities - ensuring green infrastructure - producing renewable energy - reducing air pollution, reducing GHG emissions, reducing carbon footprint.	Own production activities - monitoring methane emissions - reducing methane emission losses, reducing carbon footprint.	Own activities - production - reducing energy consumption and thus reducing carbon footprint.
<b>Time horizon</b>	2024 - 2025	2024 - 2026	2024 - 2027	2024 - 2027	2024 - 2026	2024	2024
<b>Actions in 2024</b>	Works in progress	<b>Development of:</b> - Design brief - Specifications - Acquisition and realization of feasibility study - Permitting procedure	Development of specifications. Procurement of design, installation, maintenance of photovoltaic systems on micro-hydropower roof.	Development of specifications. Procurement of design, installation, maintenance of photovoltaic systems on micro-hydropower roof.	Development of specifications.	Equipped with 7 equipment for the detection and quantification of methane emissions. Methane emission monitoring (continuous process).	Lighting modernization works at SC Mureş, SC Grebeniş and SC Sânmărtin  Environmental protection training.
<b>Progress of actions</b>	Work continues from 2024	Realized 100% of what was planned for 2024 (Feasibility Study).	Specifications were developed and a Contract was concluded for "Design,	Specifications were developed and a Contract was concluded for "Design, purchase, installation,	Specifications have been drawn up. Award procedure underway.	7 pieces of equipment for the detection and quantification of methane emissions were purchased.	Completed 75% of modernization works on lighting installations at SC Mures

		Obtaining (partial) approvals.	purchase, installation, maintenance of photovoltaic system on the roof of the pumping station building and roof of the micro-hydropower plant building.	maintenance of photovoltaic system on the roof of the pumping station building and roof of the micro-hydropower plant building.			Completed 75% of modernization works of lighting installations at SC Grebeniș Completed 75% of modernization works of lighting installations at SC Sânmărtin
<b>Targets</b>	Reduction of NOx emissions compared to the existing operating situation of the lernut by about 72% after commissioning of the objective in 2025 Reduction of specific CO <sub>2</sub> emissions directly generated by the installations by 0.205 tCO <sub>2</sub> /MWh electricity produced (0.565 in 2024, and from 2025 this will be 0.360).	Estimated decrease of greenhouse gas emissions by 50.99 tCO <sub>2</sub> eq/year and obtaining 238,959,57 kWh/year of green energy	No numerical targets have been set for 2024. The contract for "Design, procurement, installation, maintenance of photovoltaic system on the roof of the pumping station building and the roof of the micro-hydropower plant building" was signed at the end of 2024.	No numerical targets have been set for 2024. The contract for "Design, procurement, installation, maintenance of photovoltaic system on the roof of the pumping station building and the roof of the micro-hydropower plant building" was signed at the end of 2024.	No numerical targets have been set. Award procedure ongoing.	7 equipment for the detection and quantification of methane emissions	SC Sânmărtin - energy saving - 2,26 toe/year SC Mureș - energy saving - 2,75 toe/year SC Grebeniș energy saving - 2,61 toe/year
<b>Current financial resources allocated to the Action Plan (Capex) and an explanation of how this relates to the most relevant amounts</b>	Planned 348.656 thousand RON Realized 209,847.01 thousand RON The financial resources allocated in 2024 can be found in the consolidated annual financial statements, within the fixed assets additions note 12.	Planned 110 thousand RON Realized 55,980 thousand RON The financial resources allocated in the year 2024 are included in the consolidated annual financial statements, within the fixed assets additions note 12.	Planned 710 thousand RON, Realized zero Contract concluded in November 2024, with 36 months of execution.	Planned 212 thousand RON Realized zero Contract concluded in November 2024, with an execution term of 36 months.	Planned 25.619 thousand RON Realized zero	Planned 3.500 thousand RON Realized 3.219,14 thousand RON The financial resources allocated in 2024 can be found in the consolidated annual financial statements, within the fixed assets additions note 12.	SC Mures Planned 300 thousand RON Realized 736,60 thousand RON SC Grebeniș Planned 300 thousand RON Realized 14,68 thousand RON SC Sânmărtin Planned 300 thousand RON Realized 345,90 thousand RON The financial resources allocated in 2024 can be found in the

							consolidated annual financial statements, within the fixed assets additions note 12.
<b>Future financial resources allocated to the Action Plan</b>	The 2025 PINV has not been finalized.	The 2025 PINV has not been finalized.	The value of the contract concluded in 2024 is 445,47 thousand RON. Total contract 512,04 thousand RON.	The value of the contract concluded in 2024 is 66,57 thousand RON	The 2025 PINV has not been finalized.	Not the case.	The 2025 PINV has not been finalized.

PPME - Environmental Protection and Ecology Program  
PINV - Investment Plan

### **Actions aimed at infrastructure integrity to prevent GHG emissions**

The Romgaz infrastructure management system involves the implementation and application of specific procedures designed to ensure the efficient maintenance of the natural gas infrastructure. These procedures are detailed and classified according to the type of maintenance and specific activity, and are essential to ensure the integrity and continuous operation of the natural gas infrastructure, preventing and addressing any failures or accidents that could lead to the release of GHG emissions into the atmosphere.

To enhance operational safety and energy efficiency, Romgaz conducts the following activities annually:

- **Energy consumption analysis:** As part of maintenance processes, energy consumption is analysed annually. If opportunities to reduce specific energy consumption are identified, upgrades are proposed and implemented.
- **Inspection and revision:** A systematic program has been initiated for inspecting, verifying, and revising electrical and mechanical installations at all Romgaz sites. This program aims to ensure the correct and safe operation of these installations.
- **Fire detection and signalling:** A program has been launched to install fire detection and signalling systems for important sites where permanent staff is present. These systems are essential for preventing and swiftly managing potential fires, ensuring the protection of personnel and infrastructure.

For controlling fugitive or accidental GHG emissions, Romgaz implements inspection and maintenance measures for natural gas pipeline routes. To record interventions, the company maintains a maintenance register and remediation reports where applicable.

The actions presented have been planned and implemented at the level of Romgaz's own operations and no actions have been implemented targeting the value chain.

### **Depogaz**

Depogaz's actions regarding the reduction of GHG emissions from fugitive losses are not yet aligned with the ESRs requirements, but they involve ensuring efficient maintenance. Thus, a series of technical measures are continuously implemented, including:

- Expert services for pressure vessels, pipelines, and lifting equipment;
- Inspections and testing services for RI and IP ISCIR/CNCIR;
- Services for overhauling, checking, and adjusting safety valves;
- Periodic technical inspections (VTP) and maintenance of gas-consuming appliances;
- Gas, smoke, and fire detection systems;
- Maintenance of air conditioning units.

Specifically, the Bilciurești project contributes to reducing greenhouse gas emissions and pollutants, in line with European decarbonization policies and the rising prices of ETS emission certificates. By implementing the project, the role of natural gas as a transitional fuel is recognized.

### **RBS**

RBS, as operational activities, carries out office activities and, therefore, aims to reduce electricity consumption through staff training. Regarding the Neptun Deep project, it is currently in the development phase. Neptun Deep is a project designed with a carbon footprint below the industry average by adopting the most advanced technical practices available, alongside the use of cutting-edge exploitation technologies. All productive infrastructure (onshore and offshore) will be newly built. The production platform will generate its own electricity and is designed to operate at the highest safety and environmental protection standards.

Regarding the implementation of projects for renewable energy production, the Administration Plan targets the construction/acquisition of renewable energy production facilities (photovoltaic park) with a total cumulative capacity of 180 MW by 2030.

The actions presented have been planned and implemented at the level of the company's own operations, and no actions have been implemented targeting the value chain.

### 3.4 Metrics and targets

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

For the reporting year, no long-term GHG reduction targets aligned with the disclosure requirements in ESRS E1 - Climate Change have been set for any entity within the ROMGAZ Group (Romgaz, Depogaz, and RBS). Therefore, the information required by requirement 34 and AR 23 and 24 of this standard cannot be presented.

However, for some of the measures presented in section E1-3 Actions and resources related to climate change policies, Romgaz has established indicators and project targets. These targets aim to reduce GHG emissions from Scope 1 and Scope 2 and have been set as gross targets. The information is included in the table in section E1-3: Actions and resources related to climate change policies on page 63.

Stakeholder consultation was not conducted when setting these targets.

Project	Target set/planned	Achievement
Development of the Iernut CTE through the construction of a new combined-cycle thermoelectric power plant with gas turbines	Reduction of NO <sub>x</sub> emissions compared to the current operation of the Iernut CTE by approximately 72%. Reduction of specific CO <sub>2</sub> emissions directly generated by the installations by 0.205 tCO <sub>2</sub> /MWh of electricity produced.	The project is still under execution - planned to be delivered in 2025.
Parking redevelopment at the Romgaz headquarters through the installation of photovoltaic panels	Estimated decrease in greenhouse gas emissions by 50.99 tCO <sub>2</sub> eq/year	100% of what was planned for 2024 has been completed (Feasibility Study). Obtaining permits (partial).
Acquisition with equipment for detecting and quantifying methane emissions	Purchase of 7 equipment units for detecting and quantifying methane emissions.	100%
Modernization of lighting installation SC Mures, SC Grebeniş and SC Sânmărtin	SC Sânmărtin - energy saving - 2,26 toe/year SC Mureş - energy saving - 2,75 toe/year SC Grebeniş - energy saving - 2,61 toe/year	The projects are under execution - planned to be delivered in 2025.

The decarbonization levers used for these projects are:

- Energy efficiency;
- Renewable energy production;
- Monitoring, detection, and elimination of GHG emissions.

### 3.4.2 E1-5: Energy consumption and mix

Type of energy/2024	Romgaz	Depogaz	RBS	ROMGAZ Group
(1) Fuel consumption from coal and coal products (MWh)	0	0	0	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	45,950.57	400.86	18.38	46,369.81
(3) Fuel consumption from natural gas* (MWh)	3,444,623.59	145,564.89	75.77	3,590,264.25
(4) Fuel consumption from other fossil sources (MWh)	0	0	0	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	0	122.46	36.05	158.51
<b>(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)</b>	<b>3,490,574.16</b>	<b>146,088.21</b>	<b>130.20</b>	<b>3,636,792.57</b>
Share of fossil sources in total energy consumption (%)	100%	72.45%	61.81%	98.49%
(7) Consumption from nuclear sources (MWh)	0	7,982.37	29.12	8,011.49
Share of consumption from nuclear sources in total energy consumption (%)	0%	3.96%	13.82%	0.22%
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0	0	0	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	0	47,560.22	51.34	47,611.56
(10) The consumption of self-generated non-fuel renewable energy (MWh)	0	0	0	0
<b>(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</b>	<b>0</b>	<b>47,560.22</b>	<b>51.34</b>	<b>47,611.56</b>
Share of renewable sources in total energy consumption (%)	0%	23.59%	24.37%	1.29%
<b>Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)</b>	<b>3,490,574.16</b>	<b>201,630.80</b>	<b>210.66</b>	<b>3,692,415.61</b>

Total ROMGAZ	2024
Non-renewable energy production (MWh)	880,342.519
Renewable energy production (MWh)	0

Energy intensity based on net revenue	2023	2024	% 2024 / 2023
<b>Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/thousand RON)</b>			
ROMGAZ Group	-	0.4683	-



The year 2024, is considered the first reporting year under ESRS standards. Comparative data as required by ESRS are therefore not presented.

Revenue breakdown 2024	ROMGAZ Group
Net revenue from activities in high climate impact sectors used to calculate energy intensity	7,884,511 thousand RON
Net revenue (other)	44,925 thousand RON
Total net revenue (Financial statements)	7,929,436 thousand RON

\*Note: The amount was calculated based on the company's revenues from the extraction and processing of natural gas and the production of electricity from fossil gaseous fuels, as total net revenues minus total net revenues from activities in sectors with a high climate impact.

### 3.4.3 E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions

The year 2024 is the first year for which ROMGAZ Group has applied the ESRS E1 - Climate change requirements to calculate its carbon footprint. Therefore, a comparison with emissions calculated and reported in the previous year cannot be provided. The emissions reported in previous years followed an internal methodology, and comparing them with the results obtained for 2024 would not be relevant.

SPEE Iernut holds Authorization no. 58/15.02.2021 for greenhouse gas emissions for the period 2021-2030. SPEE Iernut has a Greenhouse Gas Emissions Monitoring and Reporting Plan and prepares an "Annual Greenhouse Gas Emissions Monitoring Report," which is validated by an independent verification body. The Annual Greenhouse Gas Emissions Monitoring Report and the CO<sub>2</sub> Emissions Validation Report are also evaluated/approved by the National Environmental Protection Agency - Climate Change Directorate. The CO<sub>2</sub> emissions monitoring report for 2024 has been externally validated and approved, and the CO<sub>2</sub> emission certificates required for 2024 compliance have been returned in accordance with applicable legal provisions. In 2024, only the 200 MW Unit No. 5 was operational at SPEE Iernut.

#### Scope 1 GHG Emissions

The following assumption were considered for calculating Scope 1 emissions:

##### Stationary sources:

- Natural gas consumption used for the operation of thermal power plants, recorded at all Romgaz branches and subsidiaries, including the headquarters in Medias;
- Fuel consumption (diesel and gasoline) used for the operation of stationary equipment (generators, diesel pumps, etc.);
- Fugitive methane emissions generated during natural gas extraction processes carried out by the Medias, Tg. Mures, and Buzău branches;
- The amount of natural gas (2,725,470.82 MWh) used by the SPEE Iernut Branch for electricity production. The emissions generated by the IMA 5 facility at the SPEE Iernut Branch, which falls under the scope of the EU ETS, were calculated by SPEE Iernut representatives in accordance with the requirements set out in Authorization no. 58/15.02.2021 regarding GHG emissions for the period 2021-2030.

##### Mobile Sources:

- Fuel consumption (diesel and gasoline) used for vehicle fleets owned or operated by each Romgaz subsidiary and branches;
- Fuel consumption (diesel and gasoline) used for non-road vehicles or mobile equipment owned by Romgaz branches;
- LPG consumption recorded for forklifts owned by the Depogaz subsidiary.

For vehicles acquired through leasing or rented by certain branches from other Romgaz subsidiaries/branches, operational control over the rented vehicles was considered, and emissions were accounted for under Scope 1 rather than Scope 3.

#### Fugitive Emissions:

- Category/type of equipment containing fluorinated gases;
- Number of equipment units owned by each branch/subsidiary;
- Type of refrigerants used;
- Quantities of refrigerants refilled in installations in 2024, which were considered equal to the amount of fugitive emissions/leakages. This information was compiled from maintenance reports.

The emission factors used were sourced from DEFRA 2024, IPCC AR6, and SPEE Iernut.

The year 2024 was the first in which Scope 1 emissions were calculated in accordance with the GHG Protocol; therefore, no comparative data can be provided.

Scope 1 GHG emissions (tCO <sub>2</sub> eq)		2023	2024	% 2024 / 2023
Romgaz	Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	-	860,506.20	-
	Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	58.13%	-
	Biogenic CO <sub>2</sub> emissions (from combustion or biodegradation of biomass) - not included in GHG Scope 1	-	0	-
Depogaz	Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	-	57,442.13	-
	Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	0%	-
	Biogenic CO <sub>2</sub> emissions (from combustion or biodegradation of biomass) - not included in GHG Scope 1	-	0	-
RBS	Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	-	19.37	-
	Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	0%	-
	Biogenic CO <sub>2</sub> emissions (from combustion or biodegradation of biomass) - not included in GHG Scope 1	-	0	-
ROMGAZ Group	Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	-	917,967.70	-
	Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	54.49%	-
	Biogenic CO <sub>2</sub> emissions (from combustion or biodegradation of biomass) - not included in GHG Scope 1	-	0	-

#### Scope 2 GHG Emissions

For the calculation of Scope 2 emissions, the total electricity consumption (kWh) recorded at each branch was considered, based on the contracted suppliers.

Emissions associated with energy consumption were calculated using both the location-based and market-based methods. Since the emission factors for 2024 had not been published at the time of the calculation, the 2023 emission factors provided by the contracted suppliers were used. Self-supply situations were excluded.

The year 2024 was the first in which Scope 2 emissions were calculated in accordance with the GHG Protocol; therefore, no comparative data can be provided.

Scope 2 GHG emissions		2023	2024	% 2024 / 2023
Romgaz	Gross location-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	Included in Scope 1 (Self-Supply)	-
	Gross market-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	Included in Scope 1 (Self-Supply)	-
	Biogenic CO <sub>2</sub> emissions (from the combustion or biodegradation of biomass) - not included in Scope 2 of GHG emissions	-	0	-
Depogaz	Gross location-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	9,586.08	-
	Gross market-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	72.25	-

	Biogenic CO <sub>2</sub> emissions (from the combustion or biodegradation of biomass) - not included in Scope 2 of GHG emissions	-	0	-
RBS	Gross location-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	20.06	-
	Gross market-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	17.76	-
	Biogenic CO <sub>2</sub> emissions (from the combustion or biodegradation of biomass) - not included in Scope 2 of GHG emissions	-	0	-
ROMGAZ Group	Gross location-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	9,606.14	-
	Gross market-based Scope 2 GHG emissions tCO <sub>2</sub> eq	-	90.01	-
	Biogenic CO <sub>2</sub> emissions (from the combustion or biodegradation of biomass) - not included in Scope 2 of GHG emissions	-	0	-

### Scope 3 GHG Emissions

The year 2024 was the first in which Scope 3 emissions were calculated in accordance with the GHG Protocol; therefore, no comparative data can be provided.

Significant scope 3 GHG emissions		2023	2024	% 2024 / 2023
Romgaz	<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>	-	<b>9,864,242.99</b>	-
	1 Purchased goods and services	-	43,006.41	-
	2 Capital goods	-	90,944.53	-
	3 Fuel and energy-related Activities (not included in Scope1 or Scope 2) - based on Market	-	13,987.57	-
	4 Upstream transportation and distribution	-	136.88	-
	5 Waste generated in operations	-	522.48	-
	6 Business traveling	-	352.18	-
	7 Employee commuting	-	1,912.31	-
	8 Upstream leased assets	-	-	-
	9 Downstream transportation	-	408,890.45	-
	10 Processing of sold products	-	2,148.06	-
	11 Use of sold products	-	9,302,342.13	-
	12 End-of-life treatment of sold products	-	-	-
	13 Downstream leased assets	-	-	-
	14 Franchises	-	-	-
	15 Investments	-	-	-
	Biogenic CO <sub>2</sub> emissions (from biomass combustion or biodegradation) - not included in GHG Emission Scope 3	-	0	-
Depogaz	<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>	-	<b>15,865.40</b>	-
	1 Purchased goods and services	-	2,947.11	-
	2 Capital goods	-	12,369.47	-
	3 Fuel and energy-related Activities (not included in Scope1 or Scope 2) - based on Market	-	32.48	-
	4 Upstream transportation and distribution	-	10.28	-
	5 Waste generated in operations	-	113.66	-
	6 Business traveling	-	217.91	-
	7 Employee commuting	-	174.50	-
	8 Upstream leased assets	-	-	-
	9 Downstream transportation	-	-	-
	10 Processing of sold products	-	-	-
11 Use of sold products	-	-	-	

	12 End-of-life treatment of sold products	-	-	-	
	13 Downstream leased assets	-	-	-	
	14 Franchises	-	-	-	
	15 Investments	-	-	-	
	Biogenic CO <sub>2</sub> emissions (from biomass combustion or biodegradation) - not included in GHG Emission Scope 3	-	0	-	
	<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>	-	<b>70,685.84</b>	-	
RBS	1 Purchased goods and services	-	70.59	-	
	2 Capital goods	-	70,599.67	-	
	3 Fuel and energy-related Activities (not included in Scope1 or Scope 2) - based on Market	-	9.52	-	
	4 Upstream transportation and distribution	-	-	-	
	5 Waste generated in operations	-	0.46	-	
	6 Business traveling	-	1.15	-	
	7 Employee commuting	-	4.44	-	
	8 Upstream leased assets	-	-	-	
	9 Downstream transportation	-	-	-	
	10 Processing of sold products	-	-	-	
	11 Use of sold products	-	-	-	
	12 End-of-life treatment of sold products	-	-	-	
	13 Downstream leased assets	-	-	-	
	14 Franchises	-	-	-	
	15 Investments	-	-	-	
	Biogenic CO <sub>2</sub> emissions (from biomass combustion or biodegradation) - not included in GHG Emission Scope 3	-	0	-	
		<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>	-	<b>9,950,794.23</b>	-
	ROMGAZ Group	1 Purchased goods and services	-	46,024.11	-
2 Capital goods		-	173,913.66	-	
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2) - based on Market		-	14,029.57	-	
4 Upstream transportation and distribution		-	147.16	-	
5 Waste generated in operations		-	636.60	-	
6 Business traveling		-	571.24	-	
7 Employee commuting		-	2,091.25	-	
8 Upstream leased assets		-	-	-	
9 Downstream transportation		-	408,890.45	-	
10 Processing of sold products		-	2,148.06	-	
11 Use of sold products		-	9,302,342.13	-	
12 End-of-life treatment of sold products		-	-	-	
13 Downstream leased assets		-	-	-	
14 Franchises		-	-	-	
15 Investments		-	-	-	
Biogenic CO <sub>2</sub> emissions (from biomass combustion or biodegradation) - not included in GHG Emission Scope 3		-	0	-	
<b>Total GHG emissions</b>		<b>2023</b>	<b>2024</b>	<b>%2024/2023</b>	
Romgaz		<b>Total GHG emissions (location based) (tCO<sub>2</sub>eq)</b>	-	<b>10,724,749.19</b>	-
	<b>Total GHG emissions (market based) (tCO<sub>2</sub>eq)</b>	-	<b>10,724,749.19</b>	-	
Depogaz	<b>Total GHG emissions (location based) (tCO<sub>2</sub>eq)</b>	-	<b>82,893.61</b>	-	
	<b>Total GHG emissions (market based) (tCO<sub>2</sub>eq)</b>	-	<b>73,379.79</b>	-	

RBS	Total GHG emissions (location based) (tCO <sub>2</sub> eq)	-	70,725.27	-
	Total GHG emissions (market based) (tCO <sub>2</sub> eq)	-	70,722.97	-
ROMGAZ Group	Total GHG emissions (location based) (tCO <sub>2</sub> eq)	-	10,878,368.07	-
	Total GHG emissions (market based) (tCO <sub>2</sub> eq)	-	10,868,851.94	-

The reporting thresholds considered, the calculation methods for estimating greenhouse gas emissions and the calculation tools applied for each significant GHG category in Scope 3 are presented in the table below:

Type	Reporting perimeter considered	Calculation methods for estimating GHG emissions	Applied calculation tools
<b>Purchased goods and services</b>	List of goods and services purchased by each /subsidiary of ROMGAZ Group in 2024.	The emissions were calculated using the spend-based method. Expenditures were classified based on the CPV (Common Procurement Vocabulary) description and the Standard Industrial Classification (SIC) categories published by the UK Government. To avoid double counting, expenses related to certain service categories that are not applicable (e.g., taxes, rent, etc.) or goods and services already included in other emission source categories were excluded from the lists of purchased goods and services. These excluded expenses include fuel and utility costs (except water), expenses for reserving transport capacities or transporting natural gas, raw material transportation costs, and business travel expenses—including accommodation costs. The RON to GBP conversion was performed using the average exchange rate published by the National Bank of Romania (BNR) for 2024.	The emission factors published by DESNZ and DEFRA in the CarbonSaver application for the year 2024 were used for each category of goods, services, or economic activities included in the SIC list.
<b>Capital goods</b>	List of capital goods acquired by each branch/subsidiary of ROMGAZ Group in 2024.	The emissions were calculated using the spend-based method. Expenditures were classified based on the CPV (Common Procurement Vocabulary) description and the Standard Industrial Classification (SIC) categories published by the UK Government. The emissions associated with the Neptun Deep project, in which the RBS Subsidiary holds a 50% stake without operational control, were also accounted for.	The emission factors published by DESNZ and DEFRA in the CarbonSaver application for the year 2024 were used for each category of goods, services, or economic activities included in the SIC list.
<b>Fuel and energy-related Activities (not included in Scope 1 or Scope 2)</b>	Quantities of fuels, natural gas and electricity not included in Scope 1 and 2.	For fossil fuels (diesel and gasoline), upstream emissions (WTT) were calculated. For consumed natural gas, upstream emissions (WTT) were not calculated in this category, as they were included in Scope 1 (Stationary Sources). Upstream emissions (WTT) associated with self-supplied electricity were included in Scope 1 (Stationary Sources), and therefore, they were not included in this category. For energy consumed from self-supply, emissions associated with losses in the electricity transmission and distribution (T&D) network were calculated and accounted for. For electricity purchased from other suppliers (e.g., Hidroelectrica and Cotroceni Park), the following emissions were calculated: Upstream emissions (WTT); Emissions associated with electricity losses in the transmission and distribution network (T&D loss); Upstream emissions associated with energy losses in the transmission and distribution network (WTT of T&D loss).	Upstream emissions for fossil fuels were calculated using the emission factors published by DEFRA for the year 2024. For calculating the upstream emissions associated with the quantities of energy consumed and the losses recorded in the transmission and distribution network, emission factors were used, calculated based on the specific emission factors of the contracted suppliers, in accordance with the calculation formulas published by DEFRA and the International Energy Agency (IEA).
<b>Upstream transportation and distribution</b>	Estimates made by the representatives of the ROMGAZ Group branches/subsidiaries regarding the distances covered by couriers/carriers contracted for the delivery of purchased goods/products (e.g.: spare parts,	For the calculation of emissions generated by the transportation of purchased goods and products, the assumption was made that the delivery was carried out using N3 category freight vehicles (Heavy Goods Vehicle - HGV).	According to the calculation formulas published by DEFRA for the year 2024.

Type	Reporting perimeter considered	Calculation methods for estimating GHG emissions	Applied calculation tools
	industrial equipment and machinery, IT equipment, various food products, etc.)		
<b>Waste generated in operations</b>	Data collected from the Waste Management Records maintained at each ROMGAZ Group subsidiary/branch: <ul style="list-style-type: none"> <li>Type/category of waste generated;</li> <li>Waste code according to Government Decision no. 856/2002;</li> <li>Quantity generated [tons];</li> <li>Treatment method (disposal/recovery);</li> <li>Treatment operation code for recovery/disposal.</li> </ul>	The categories of waste generated were classified based on their nature into the waste categories published by DEFRA. Emission factors were allocated based on the management method (recovery/disposal).	According to the calculation formulas published by DEFRA for the year 2024.
<b>Business traveling</b>	For each branch/subsidiary of ROMGAZ Group, information was provided on business trips by plane (air transportation), by other means of transportation (transfers by taxi, Uber, transfer companies, or train trips), and accommodation in the country and abroad.	For air transportation, both the distances travelled (km) and the emissions were calculated using the ICEC (ICAO Carbon Emissions Calculator) application developed by the International Civil Aviation Organization. Emissions associated with accommodation services were calculated using the Hotel Footprinting Tool developed by GreenView. For accommodation units where the classification was unknown, the emission factor for the category "All hotels" was allocated. For business travel using other modes of transport (passenger vehicles or trains), representatives from ROMGAZ Group subsidiaries/branches calculated the total distances travelled with each mode of transport used.	The ICEC application developed by ICAO The Hotel Footprinting Tool developed by GreenView According to the calculation formulas published by DEFRA, 2024
<b>Employee commuting</b>	The following information was provided: <ul style="list-style-type: none"> <li>Total number of employees at ROMGAZ Group level;</li> <li>average number of vacation days;</li> <li>number of days off granted according to the CCM;</li> <li>amount of fuel settlements.</li> </ul>	From the total number of working days in 2024 (252), the vacation days (30) and the days off granted to each employee according to the collective labor agreement (4) were subtracted: 252 - 30 - 4 = 218 ROMGAZ Group estimated that the average daily distance travelled by each employee of the company is 10 km (round trip). It was estimated that 80% of Romgaz employees and those of the Depogaz subsidiary travel by their personal cars (50% diesel and 50% gasoline), while the remaining 20% of employees use public transportation (diesel bus). The total distances were calculated by multiplying the number of employees using each mode of transport by the number of working days and the daily distance travelled. Reimbursements recorded in accounting for personal car use were also taken into account for employees traveling more than 5km (558.502,00 RON), as well as reimbursements for transport used by Romgaz employees for family visits (63.274,00 RON).	According to the calculation formulas published by DEFRA for the year 2024 and CarbonSaver application.

Type	Reporting perimeter considered	Calculation methods for estimating GHG emissions	Applied calculation tools
		<p>The emissions associated with the transportation for which reimbursements were made were calculated using the spend-based calculation method.</p> <p>The RON to GBP conversion was performed using the average exchange rate published by the National Bank of Romania (BNR) for 2024 (detailed on the Exchange Rate Page).</p>	
<b>Downstream transportation</b>	<p>Information was provided on:</p> <ul style="list-style-type: none"> <li>- Total quantity of natural gas, sold in 2024 (m3);</li> <li>- transportation of by-products (well condensate and crude oil) from the generation/extraction site to the processing facilities.</li> </ul>	<p>For determining the fugitive natural gas emissions from the transmission network, the percentage of 0.44%, indicated in the 2023 Administrator's Report published by Transgaz, was used as the "share of gas consumption in the National Transmission System (SNT)."</p> <p>The conversion from m<sup>3</sup> to tons was carried out using the density provided by ROMGAZ Group representatives (0.0006844 t/m3).</p> <p>CO<sub>2</sub>eq emissions were calculated using the methane emission factor published by the IPCC in AR6.</p> <p>The distances travelled for transporting condensate and crude oil were calculated using the Google Maps application, based on information provided by ROMGAZ Group representatives regarding: the extraction site and the recipient - the processing facility. After determining the distances for each route, they were multiplied by the number of transport trips to determine the total distances.</p>	<p>According to the calculation formulas published by DEFRA, 2024, and IPCC AR6.</p>
<b>Processing of sold products</b>	<p>The total quantities of crude oil and condensate delivered to processing facilities.</p>	<p>The emissions generated from the processing and refining of the by-products sold by Grupul ROMGAZ were calculated using the emission factor published by one of the beneficiaries of these products, OMV Petrom, in its 2023 sustainability report (0.25 tons CO<sub>2</sub>eq/ton of crude oil).</p> <p>Since there is no information available regarding the emission intensity from the refining process for Darogas OIL, which purchased 6.8% of the total condensate quantity generated by Romgaz, the same emission factor published by OMV Petrom was used.</p>	<p>The OMV Petrom Sustainability Report for the year 2023, page 140.</p>
<b>End-of-life treatment of sold products</b>	<p>Total amount of natural gas sold in 2024 (m3)</p>	<p>The emissions generated from the use of natural gas sold by ROMGAZ Group were calculated using the emission factor published by DEFRA for the year 2024.</p>	<p>According to the calculation formulas published by DEFRA for the year 2024.</p>



The table below presents the **GHG emission categories** from **Scope 3** included in the inventory and excluded from the inventory, along with a justification for the excluded categories.

Scope 3 GHG Emissions	Included/Excluded	Justification for exclusion
1 Purchased goods and services	Included	
2 Capital goods	Included	
3 Fuel and energy-related Activities (not included in Scope 1 or Scope 2) - based on Market	Included	
4 Upstream transportation and distribution	Included	
5 Waste generated in operations	Included	
6 Business traveling	Included	
7 Employee commuting	Included	
8 Upstream leased assets	Excluded	For vehicles that are leased or rented <b>inter-company</b> , operational control was taken into account, and emissions were calculated under <b>Scope 1</b> , based on the recorded fuel consumption.
9 Downstream transportation	Included	
10 Processing of sold products	Included	
11 Use of sold products	Included	
12 End-of-life treatment of sold products	Excluded	It does not apply to the product sold by ROMGAZ Group (natural gas).
13 Downstream leased assets	Excluded	It is not applicable to the company, as it does not have leased assets downstream.
14 Franchises	Excluded	It is not applicable to the company, as it does not have any franchises.
15 Investments	Excluded	It is not applicable - the investments made by ROMGAZ Group have been included in Scope 3, Category 2 - Capital goods.

The year 2024 was the first in which the carbon footprint was calculated according to the GHG Protocol, therefore comparative data cannot be presented.

GHG intensity per net revenue - ROMGAZ Group:

	2023	2024	% 2024 / 2023
Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> eq/thousand unit)	-	1.372	-
Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> eq/thousand unit)	-	1.371	-
Net revenue used to calculate GHG intensity	-	7,929,436 thousand RON	-
Net revenue (other)	-	0	-
Total net revenue RON (in financial statements)	-	7,929,436 thousand RON	-

#### 3.4.4 E1-7: GHG removals and GHG mitigation projects financed through carbon credits

During the reporting period, ROMGAZ Group did not develop or contribute to greenhouse gases (GHG) absorption or storage projects. Also, no external projects for GHG mitigation or removals were financed through the purchase of carbon credits.

The company does not own or did not use carbon credits during the reporting period and did not make any public statements on GHG neutrality.

In the medium term, the ROMGAZ Group aims to adopt a Decarbonization Plan and to assess the feasibility of injecting carbon dioxide into depleted gas fields, with a view to carbon and capture storage services.

#### **3.4.5 E1-8: Internal carbon pricing**

ROMGAZ Group does not currently use an internal carbon pricing system.

#### **3.4.6 E1-9: Anticipated financial effects from material physical and transition risks and potential climate-related opportunities**

ROMGAZ Group applies the principles of phased-in application, according to the provisions of Annex C of ESRS 1, for the reporting of ESRS E1-9 requirement. Thus, at this stage, the Company does not disclose detailed information on the anticipated financial effects from material physical and transition risks, and potential climate-related opportunities.

The necessary information will be included in future reporting, as the processes and methodologies for assessing these impacts will be developed and implemented. This approach ensures alignment with the ESRS requirements, taking into account the group's current resources and processes.

## 4 ESRS E2 - Pollution

### 4.1 Interactions with other ESRS

The topic of pollution is interconnected with all the other environmental topics, such as climate change, water and marine resources, circular economy and biodiversity, even if it these resulted as non-material topic following the double materiality assessment process. At the same time, pollution of air may have impact on the company's own employees and on the community. Greenhouse gas emissions represent ROMGAZ Group's most significant impact on the air, and therefore the ESRS E1 - Climate Change section covers this topic in detail.

Pollution of soil and pollution of water do not represent material topics for ROMGAZ Group. However, water use issues are covered in ESRS E3 - Water and marine resources, while process safety and accident prevention, that might affect soil and water, are covered in ESRS S1 - Own workforce - Health and safety.

### 4.2 Impact, risk and opportunity management

#### 4.2.1 ESRS IRO-1: Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

Environmental impacts have been identified and evaluated based on assessment criteria, under different operating conditions (regular, irregular and under reasonably foreseeable emergency situations), according to the system procedure "Identification and assessment of environmental aspects" and to the double materiality assessment performed in 2024.

The current and potential impacts related to pollution are closely linked to the business strategy and model, as the activities of ROMGAZ Group generate emissions during the production and processing of natural gas, as well as fugitive emissions.

The company manages pollution through an integrated approach covering all stages of its operations, from the production, processing and transport of gas to the use and purchase of materials, products and services. Key activities that generate material impacts, risks and opportunities related to pollution include the following: natural gas extraction, drying, compression, storage, interventions, samples of production, reequipments and additions to wells, special operations at wells, electricity production, well drilling and purchase of goods and services.

ROMGAZ Group identified its pollution-related impacts through the double materiality assessment accomplished according to the requirements of the ESRS standards. The process covered both the company's own operations, as well as its value chain. The double materiality assessment included:

- Consultation of internal and external stakeholders, including local communities, regulatory authorities and business partner, through the distribution of questionnaires. This process enabled feedback collection on environmental impact perception, community concerns and expectations related to the pollution related measures.
- Identification and assessment of pollution related risks.
- Assessment of the opportunities related to pollution reduction.

Following the double materiality assessment process, "Pollution of air" has been identified as a material topic for ROMGAZ Group. According to the assessment, the material impact, both positive and negative, is significant for this material topic taking into account all the company's assets. Although the associated risks and opportunities have been taken into consideration in the double materiality assessment process, they have not been evaluated/identified as material.

## IRO on Pollution of air

### Legend:

Type of impact: F = financial impact, M = material impact, MF = material and financial impact

Time horizon: A = current impact (reporting year), P = potential impact (medium and long term)

Source of impact: S = impact arising from strategy and business model, B = impact underpinning strategy

Material Topic and sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Pollution <b>Pollution of air</b>	Upstream, own operations, downstream	M	B	A and P		A	<p>Impacts generated by the large amounts of non-GHG air pollutants including SO<sub>x</sub>, NO<sub>x</sub>, non-methane volatile organic compounds (NM-VOCs). They may arise from own operations and during the production and manufacture of materials and products purchased and used by the company.</p> <p>Air pollution causes acute health problems, contributing to heart and lung disease, strokes, respiratory infections and neurological disorders, both for the company's own workers and for the communities where the Company operates.</p> <p>Children, the elderly and the vulnerable are disproportionately affected by these emissions, as are local communities adjacent to operational sites.</p> <p>Air pollution can cause and may have negative effects on fauna and flora.</p> <p>Air pollution may accidentally occur because of technical flaws or human errors.</p>	-	-

Consultations regarding the impact on the environmental and people are conducted also in accordance with applicable legal requirements and internal procedures as follows:

- For new projects and programs with significant environmental impact, according to the current legislation in force, ROMGAZ Group shall prepare the environmental impact assessment, after which the public shall be informed and involved in the environmental impact assessment procedure. This process includes public debates organized to analyse the proposed activities and their consequences on the environment, thus facilitating the involvement of local communities and other stakeholders.
- In carrying out existing activities or extending them, the Society requires and obtains, where appropriate, Environmental Authorizations or Integrated Environmental Authorizations, as required by law. The process of obtaining such regulatory acts also involves public debates, which provide an opportunity for interested parties to contribute comments on its work and environmental impact.

ROMGAZ Group informs the public on a quarterly basis of the consequences of its activities on the environment by publishing the relevant information on the Company's official website available at <https://www.romgaz.ro/mediu>.

#### 4.2.2 E2-1: Policies related to pollution

ROMGAZ Group does not currently have a specific policy on air pollution, but the Integrated Management System Policy (IMS) aims at achieving the objective of pollution prevention, including air pollution. According to the ISO 14001:2015 requirements, ROMGAZ Group has set environmental objectives. They are to be identified in the "Objectives Document", elaborated in accordance with the "Objectives Management" procedure, also covering air pollution. ISO 14001:2015 system covers air pollution issues at both Romgaz and Depogaz.

Due to the specific nature of its activity (office work), there was no policy for RBS to cover this topic during the reporting year.

The IMS policies of Romgaz and Depogaz are aligned, and therefore the information mentioned below is applicable to both entities.

The primary responsibility for the implementation and monitoring of the IMS components, including those related to air pollution, lies with the General Director of the Company. Its recertification occurs every 3 years and the supervisory audit takes place annually, ensuring that all the activities and processes comply with the legal regulations and requirements of the integrated management system.

The integrated management system supports the fulfilment of the mission by setting up certain objectives. In relation to environmental protection, these objectives are:

- pollution prevention and reduction of the undesirable effects of ROMGAZ Group operations on the environment;
- continuous monitoring and systematic assessment of the processes carried out, to ensure their efficiency and effectiveness;
- each employee's responsibility in relation to their personal contribution to the performance of the integrated quality, environmental, health and safety management system;
- the adoption of best operating practices and the imposition of the same standards on the company's contractors and suppliers.

To prevent environmental pollution and reduce environmental impact, the environmental issues related to the activities, products and services of ROMGAZ Group were identified and assessed.

The environmental issues identified under the "Environmental Management System" procedure are monitored according to the "Monitoring and Measurement" procedure and to the operational procedures/working instructions in force.

The compliance with the requirements set by law or by the environmental permits is assessed internally, within the environmental inspections according to the "Environmental Inspection" instruction and during the IMS audits, according to the "IMS Internal Audit" procedure, and externally as part of the controls performed by the relevant control authorities. Internal inspections are structured as follows: identification of authorized sites, elaboration of the plan and checklist specific to the activity under inspection, conduct of inspections and reporting of results.

The Environmental Protection Services within ROMGAZ Group plan the measuring – monitoring activity of the environmental factors, according to the requirements set by the applicable regulatory acts. For this purpose, the “Planning of the monitoring - measurement activity of environmental factors” form is elaborated at subsidiary and branch level.

Monitoring results (which may vary in frequency according to regulatory requirements, daily/monthly/quarterly/semi-annually/yearly) are documented in the “test reports” issued by the competent laboratories and included in the “Environmental Factor Monitoring-Measurement Register” and posted on the company’s intranet and online.

The procedures for the identification and assessment of compliance, monitoring and measurement of environmental factors, monitoring and reporting of emissions into the air, environmental reporting and control of non-compliances and corrective actions are an integral part of the management system.

Air pollution may accidentally occur because of technical failures or human errors and ROMGAZ Group shall apply the “Emergency Preparedness and Response” procedure to manage such situations. This means identifying critical points that could cause potential accidents, developing contingency plans and setting up intervention teams.

In the event of accidents having an impact on the environment, internal and external communication shall be ensured in accordance with the “Communication” and “Emergency Preparedness and Response” procedures to ensure a transparent flow of information.

When establishing the “Policy Statement on Quality, Environment and Occupational Health and Safety”, ROMGAZ Group considered the stakeholders, who are consulted whenever required by the law, while the policy is accessible through several channels:

- For employees it is displayed on the Company’s internal website and supported by training sessions, according to the “Environmental Training” instruction and whenever it is revised;
- For the public and other stakeholders the policy is published on the official website of [Romgaz](#);
- For contractors and suppliers, before commencing any work performed by third parties for, or on behalf of the Company, they shall be trained in the environmental requirements included in the contracts as well as in the Integrated Management System (IMS) policy.

Environmental complaints may be submitted by any interested party by e-mail using the addresses [secretariat@romgaz.ro](mailto:secretariat@romgaz.ro), [comunicare@romgaz.ro](mailto:comunicare@romgaz.ro), available on the Company’s external website.

The heads of organizational units receiving external environmental complaints are required to provide a copy of the complaint to the Environmental Protection Service/Office/Department (headquarters/branch) to assess and open a non-conformities (where applicable), in accordance with the “Non-Compliances Control” procedure. The communication on environmental complaints is governed by the “Communication” system procedure, based on which all complaints are properly managed and appropriate measures are adopted to address them, thereby contributing to the continuous improvement of the Company’s environmental performance.

RBS is developing a system of policies, procedures and instructions, aligned with the specificities of its current business. This is developing gradually, being a continuous process of development and improvement, linked to both the company’s current and future business needs. The Integrated Management System is to be aligned with the Romgaz Integrated Management System, but no precise deadline has been set.

For the value chain, the Company establishes for each acquisition the environmental requirements which the suppliers must comply with, according to the “Establishing occupational health and safety, environmental protection and emergency requirements when purchasing products, services, works”. Contractors and suppliers must comply with the environmental requirements stipulated in the contracts as well as with the IMS Policy.

Before the execution of contracts, the existence of the mandatory documents required at the tendering stage is checked (e.g.: environmental permit), as well as of the binding documents to be submitted by the winning bidder after the result of the tender procedure has been communicated (subcontractors’ environmental permits, contracts for waste recovery/disposal, contracts for take-over and disposal of waste water, road transport certificates/authorizations etc.). The person

appointed to monitor contract implementation shall ensure compliance with the contractual requirements, including the environmental protection related ones.

#### 4.2.3 E2-2: Actions and resources related to pollution

ROMGAZ Group’s activities in the field of the environment and air management are governed by the GOE No. 195/2005 on environmental protection, as further amended and completed, and in accordance with the Water Law No. 107/1996, as further amended and completed.

Romgaz and Depogaz undertook the following actions in 2024 to manage and reduce air pollution from their own operations.

Since RBS only performs office activities, there currently are no actions taken to address air pollution.

Romgaz	Action 1	Action 2	Action 3
<b>Actions taken and planned</b>	Identification of the environmental legal requirements applicable to procurement	Removal of uncontrolled wells condensate losses	Performing environmental inspections
<b>Scope of actions</b>	Environmental protection - prevention of pollution of air	Environmental protection - prevention of pollution of water, air and soil at the level of production branches (objective set from the level of the General Director)	Environmental protection – Maintaining compliance with regulatory acts (objective set from the level of the Deputy General Director to the Environmental Protection Department)
<b>Time horizon</b>	2024	2024	2024
<b>Main actions and results</b>	Identify, draft and send the requirements to the beneficiary entities, to be included into contracts 100% compliance with legal environmental requirements, including those related to air pollution	Seal the collection systems Accomplish the repair program On-the-spot check of the wells reflow graph, impurity calibration mode, condensation collection and delivery 0 wells condensate losses All these measures are necessary because the wells condensate is easily volatile, generating atmospheric pollutants.	Plan the internal environmental inspections which also cover air pollution issues. Romgaz monitors air pollutants in accordance with the environmental requirements imposed by the authorizations.  Conduct of inspections, reporting on the results of inspections  Target:90% inspections accomplished out of the ones planned
<b>Progress of actions</b>	Done 100% environmental requirements, including those related to air pollution, transmitted correlated with the environmental requirements at Romgaz headquarters	The objectives are included in the 2024 Objective Document. Done 100% - zero well condensate losses	Target reached.
<b>Current financial resources allocated to the Action Plan (CapEx) and an explanation of how they relate to the most relevant amounts</b>	Not applicable	-	Not applicable.
<b>Future financial resources allocated to the action plan</b>	Not applicable	-	Not applicable

To effectively manage potential emergencies situations, Romgaz has implemented emergency response measures in case of accidental pollution. In the sites generating potential environmental-related accidents, the personnel shall be trained and Intervention Plans (PIAE) displayed and tested as planned. At the same time, intervention teams are trained to promptly respond, all these actions

being carried out in accordance with the system procedure “Emergency Preparedness and Response” procedure. They are carried out according to the legal requirements in force.

In Romgaz, emissions from the combustion of natural gas in gas drying stations, natural gas compression, well and thermal-central heating are measured according to the monitoring plan. EPRTTR emissions and the inventory of air emissions are reported according to Ministry of Environment Order No. 3299/2012.

The company uses a Register of Non-Compliances that is found on the company's intranet, in which all non-conformities, corrective actions, implementation deadlines and persons in charge with enforcement/follow-up are established.

#### **Awareness-raising actions**

Under the “Environmental Training” instruction, employees with specific pollution related responsibilities are trained in the prevention of air pollution. The training is carried out annually for the employees of SPEE Iernut, Physico-Chemical Research and Analysis Laboratories, Foaming Agents Micro-production, Gas Quality and Measurement Service, Metrology Laboratory, Gas Drying Station Operation Office, Project Service for Noise Rehabilitation and Danes Sewage Treatment Plant. The results of the training are recorded in the individual training records.

The Drill Supervisory Team is informing the Environmental Protection Service about the start of the drilling works, in order for the latter to notify the competent authorities, as appropriate. The drill surveillance team is also:

- Monitoring the execution of the works throughout their lifetime, including compliance with the air pollutant related requirements set in the contract and environmental regulatory acts (environmental approval or environmental assessment decision phase, environmental permit, water management approval or permit etc.);
- Ensuring that, when the performance of the work is started, the provider's personnel is trained on the air pollutant requirements set in the tender book/contract and in Romgaz Quality, Environmental and Occupational Health and Safety Policy Statement;
- Shall immediately notify the Environmental Protection Service if, in the course of the work, it becomes aware of non-compliances with the environmental requirements, including the air pollution related ones, specified in the contract and/or in environmental regulatory acts.

At the end of the contracts, the persons appointed to monitor the implementation of the contracts shall complete the “Primary/Final Acceptance Document”, also mentioning deviations from compliance with occupational safety and health rules, PSI and environmental protection legislation, including on air pollution prevention, where applicable.

At Iernut, to minimize environmental impact and for operational efficiency, facilities and techniques considered “Best Available Techniques” (BAT) are operational as follows:

- **Efficient Combustion System:** Use advanced combustion technologies to maximize energy efficiency and reduce NO<sub>x</sub> and SO<sub>2</sub> emissions – burning in layers, which allows more uniform combustion;
- **Emission Control Systems:** Installation of filters and flue-gas desulphurization systems to reduce pollutant emissions. These facilities contribute to compliance with European environmental regulations;
- **Heat Recovery:** Use of heat recovery turbines (HRSG) to improve the overall efficiency of the plant, transforming the excess heat into electricity;
- **Monitoring and Control Systems:** Implement advanced real-time sensor monitoring systems to ensure consistent compliance with environmental standards and optimize operational processes;
- **Use Of Natural Gas:** As a main source of fuel, natural gas generates lower emissions compared to other fossil fuels, contributing to a lower environmental impact;
- **Energy Efficiency Technologies:** Implement solutions such as state-of-the-art gas turbines that provide greater efficiency for energy conversion, thus reducing fuel demand.

Air pollution related indicators (NO<sub>x</sub>, SO<sub>x</sub>, NM-VOCs) shall be monitored according to the applicable legislation. The results are presented in the Monitoring - Measurement Registry, available on the intranet of Romgaz.



During 2024, Romgaz did not identify locations where air pollution was a significant problem.

Romgaz is making the data on air pollution public through the quarterly publication of the values measured and noted in the “Environmental Factors Measurement - Monitoring Register” on the Company’s website: <https://www.romgaz.ro/factori-de-mediu>.

During the reporting year, the monitoring of air pollutants, as required by environmental permits, allowed for the setting of a compliance level with emissions.

## Depogaz

For Depogaz, the activities carried out in 2024 included:

Depogaz	Action 1	Action 2
Actions taken and planned	Purchase of powders analyzer	Purchase of a flue-gas analyzer
Scope of actions	Emission monitoring	Emission monitoring
Time horizon	2024	2024
Main actions and results	The powders analyzer was purchased and measurements done.	The flue-gas analyzer was purchased and measurements were done.
Progress of actions	n/a	n/a
Description of the type of financial resources and other current and future allocated resources for the action plan	Human resources Information resources Financial resources under the 2024 Investment Plan	Human resources Information resources Financial resources under the 2024 Investment Plan
Current financial resources allocated to the Action Plan (CapEx) and an explanation of how they relate to the most relevant amounts	Powders analyzer value = RON 46,325 VAT excluded The resources are included in the annual investment plan. The financial resources allocated in 2024 are mentioned in the consolidated annual financial statements, within the additions of fixed assets note 12.	Flue-gas analyzer value = RON 18,950 VAT excluded The resources are included in the annual investment plan. The financial resources allocated in 2024 are mentioned in the consolidated annual financial statements, within the addition of fixed assets note 12.
Future financial resources allocated to the action plan	0	0

In 2024, Depogaz did not register any complaints and was not sanctioned for air pollution.

Environmental complaints may be submitted by any interested party on the following e-mail address [secretariat@depogazploiesti.ro](mailto:secretariat@depogazploiesti.ro), available on Depogaz website.

## 4.3 Metrics and targets

### 4.3.1 E2-3: Targets related to pollution

Under the “Objective Management” procedure, the objectives, including actions, performance indicators and targets shall be set annually and documented in the “Annual Objective Document”. Their completion degree shall be reported on a semi-annual basis and the resources necessary to achieve these objectives are set out in the Annual Investment Plan and the Annual Procurement Plan.

Objectives shall cascade from the General Director/Deputy General Director down to the level of the organizational unit.

According to Romgaz objectives setting procedure, no long-term targets, but only annual targets, have been defined. For 2024, the company set and reached the following targets on air pollution prevention:

- 100 % compliance with legal environmental requirements;
- Zero wells condensate losses;
- Zero non-compliant analysis reports;
- 100 % monitoring carried out/planned;
- 90 % inspections accomplished from the planed ones;
- Zero non-compliance reports.

No targets were set for Depogaz for 2024, but the company monitored 100% of the environmental factors required in environmental permits. The values recorded for each monitored indicator are within the maximum permitted limits specified in the regulatory acts according to the test reports.

In the case of RBS, given that it only carries out office activities, there are currently no targets to address air pollution.

#### 4.3.2 E2-4: Pollution of air, water and soil

##### Air pollution

For air pollution, Romgaz monitors emissions of air pollutants (SO<sub>x</sub>, NO<sub>x</sub> and NM VOCs) from technological installations, including gas drying stations, natural gas compression stations and thermal power plants. Emissions shall be reported according to the regulations of the EPRTTR and the Pollutant Emission Inventory in the atmosphere and corrective measures shall be implemented if legal values are exceeded.

The EPRTTR reporting is carried out based on the following national legal requirements:

- Resolution No. 140 of 6 February 2008 establishing certain measures for the application of the Regulation No. 166/2006 of the European Parliament and of the Council concerning the establishment of a European Pollutant Release and Transfer Register (EPRTTR);
- Regulation No. 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register and amending Directives;
- Law No. 112 of 14 April 2009 for the ratification of the Protocol on the Register of Pollutant Release and Transfer, signed by Romania at Kiev on 21 May 2003, to the Convention on access to information, public participation in decision-making and access to justice in environmental matters.

The information required to be transmitted by Romgaz to the "National Air Pollutant Emissions Inventory" is prepared based on the CORINAIR-EMEP/EEA Guide for air pollutant emission inventory, available on the website of the National Environmental Protection Agency.

The quantities of air pollutants are calculated for each pollutant using emission factors, natural gas consumption and lower calorific value of natural gas (emission factor x natural gas consumption x lower calorific value of natural gas).

The emission factors used are those provided by EMEP/EEA 2023, according to Table 3.8, which includes Tier 1 emission factors for source category NFR 1.A.4.a/c, 1.A.5.a, using gaseous fuels (1.A.4.a.i, 1.A.4.b.i, 1.A. a.4.c.i, 1.A.5.a). The emission factors in Table 3.4 shall also be used, including include Tier 1 emission factors for source category NFR 1.A.4.a/c, 1.A.5.a, using gaseous fuels (1.A.4.a.i, 1.A.4.b.i, 1.A.4.c.i, 1.A.5.a.) for low combustion.

The measurement/calculation methodologies for environmental indicators, including those related to air pollution, are those required by legal requirements. They did not change during the reporting period.

Pollutant emitted into the air	Romgaz (without Iernut) (kg)	Iernut (mg/Nmc)	Depogaz (kg)	RBS (kg)
SO <sub>2</sub> (sulfur dioxide)	1,454.62	0	0	0
NO <sub>x</sub> (oxides of nitrogen)	274,107.97	78.608	0	0
NM-VOC (non-methane volatile organic compounds)	7,978.73	0	0	0

The total amount of pollutants monitored at Romgaz level adds the pollutants on sites where the thresholds imposed by Directive 2010/75/EU and Regulation (EC) No. 166/2006 are not exceeded. However, according to local legal requirements, the Company monitors and reports these quantities, even if the recorded values do not exceed the limits imposed by European legislation.

**Depogaz** is not legally required to report as required by the EPRTTR.

In the case of RBS, given that it only carries out office activities, no air pollution indicators were monitored.

#### 4.3.3 E2-6: Anticipated financial effects from pollution-related impacts, risks and opportunities

ROMGAZ Group applies the phased-in provisions of Appendix C of ESRS 1 for the ESRS E2-6 requirement on the anticipated financial effects of pollution related risks and opportunities.

Thus, in the first reporting year under the ESRS standard, ROMGAZ Group will not provide the information set by this requirement, using the option available in this respect. This approach reflects the need to develop internal processes, monitoring tools and infrastructure necessary to meet the more complex requirements of ESRS in the coming years.

## 5 ESRS E3 - Water and marine resources

### 5.1 Impact, risk and opportunity management

#### 5.1.1 ESRS 2 IRO-1: Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

The actual and potential impacts and risks related to water resources are closely linked to ROMGAZ Group's business strategy and model and the company's actions are aimed at minimizing negative impacts, reducing risks and identifying opportunities to protect these resources.

In 2024, in the double materiality assessment, the internal procedures and instructions on environmental protection (system procedure 'Identification and Assessment of Environmental Aspects'), as well as the provisions of the ESRS in relation to the identification of material risks, opportunities and environmental impacts, were taken into account. The analysis involved the assessment of direct and indirect impacts on water resources both in its own operations and throughout the value chain, using criteria such as their scale, severity and remediability, as well as the identification of associated risks and opportunities.

The double materiality assessment included:

- Consultation, via questionnaires, with internal and external stakeholders, including local communities, regulators and business partners;
- Identification and assessment of risks related to the use of water resources;
- Analysing opportunities to reduce water consumption and modernize wastewater treatment technologies.

Thus, two material topics of importance for ROMGAZ Group have been identified: water consumption and water discharge, as follows:

## IRO on Water and marine resources

### Legend:

Type of impact: F = financial impact, M = material impact, MF = material and financial impact

Time schedule: A = current impact (reporting year), P = potential impact (medium and long term)

Source of impact: S = impact arising from strategy and business model, B = impact underpinning strategy

Material sub-topic and Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Negative impacts (I-)	Risks (R)	Opportunities (O)
Water resources <b>Water consumption</b>	Upstream, own operation, downstream	M	S	A	The implementation of the water recirculation system at Iernut and the utilization of technologies to reduce consumption.	-	-	-
Water resources <b>Water discharge</b>	Upstream, own operation, downstream	M	S	A, P	By monitoring the quality of wastewater as required by law, ROMGAZ Group contributes to reducing water pollution by ensuring compliance with environmental regulations. By operating wastewater treatment plants for their own sites, ROMGAZ Group reduces the environmental impact by ensuring that water is treated before it returns to the natural environment and complies with the rules for protecting water resources and protecting biodiversity.  Provision of water treatment services for local communities (Daneş)	-	-	-

### 5.1.2 E3-1: Policies related to water and marine resources

ROMGAZ Group does not have a policy specific to each material sub-topic identified regarding water resources, but the Integrated Management System Policy aims to achieve the objective of reducing the unwanted effects of the company's operations on the environment. The company is certified ISO 14001:2015 and thus ROMGAZ Group integrates environmental management practices into its operations.

The ISO 14001:2015 system is applied to both Romgaz and Depogaz so that the information set out below on policies covers both entities.

RBS currently carries out office activities and is developing a system of policies, procedures and instructions, aligned with the specificities of its current business. It is developing gradually and is in a continuous process of development and improvement, linked to both the company's current and its future business needs. The Integrated Management System is to be aligned with the Romgaz Integrated Management System, but an exact deadline has not been set.

The primary responsibility for the implementation and monitoring of the components of the integrated management system, including those related to water resource management, lies with the General Director of the Company. The recertification of the system takes place every three years, and the auditing process is run every year.

The management of interaction with water is carried out using the following internal procedures and instructions:

- “Identification and assessment of environmental aspects”, which govern the identification and assessment of environmental impacts, including that on water;
- “Monitoring and measuring environmental factors”, which also defines actions to ensure compliance with quality parameters set out in water management authorizations/environmental permits;
- “Measurement, collection, transport and disposal of produced water”, which lays down rules for the management of produced water in extraction and injection processes;
- “Waste management”, which regulates the collection, temporary storage, transport, recovery and disposal of waste, including liquid waste, without creating contamination risks for air, water, soil, fauna or flora;
- Operation of the Targu Mures Water Treatment-Plant Station;
- Water treatment in the Danes mechano-biological treatment plant.

Through the integrated management system, environmental and water management permits, ROMGAZ Group manages water resources for the purpose of compliance with its quality indicators, as well as the protection of ecosystems and human health. The company seeks to prevent the supply of pollutants to surface or groundwater by complying with the limit values allowed for water quality indicators when discharged into the natural environment or the sewage network.

At the same time, in accordance with the procedures/instructions within the certified Integrated Management System (IMS):

- Personnel are trained in the requirements of SMI documents, including rules on water consumption reduction and pollution reduction;
- The discharge of wastewater whose indicators exceed the values set out in the regulations and related legislation is prohibited;
- Internal environmental inspections are carried out in accordance with the quarterly plans verifying compliance with the applicable legal requirements in the field of water;
- The impact of the activity on surface and groundwater, including through well monitoring, is monitored according to the frequency required by the authorizations (as described in the following subparagraph).

According to internal policies, procedures and instructions, ROMGAZ Group is ensuring the management of sanitary, technological, rainwater, groundwater and produced water, quantitative and qualitative reporting of sampling reports, the volumes of industrial and sanitary water, the volume of reinjected produced water. Monitoring of water quality is carried out through test reports issued by own and external approved laboratories, based on the internal monitoring plan and the

requirements of the authorities. The results are entered into the Electronic Measurement Monitoring Register. The monitoring frequency depends on regulatory requirements: daily/monthly/quarterly/semi-annually/annually.

Exceeding the values of the indicators monitored for the water environmental factor constitutes non-compliance and once the overrun has been noted, it must be documented by opening a Non-Compliance Report and Corrective Actions, which should record corrective actions, responsibilities and deadlines for their implementation. The follow-up and closure of non-compliances should be carried out in accordance with the 'Control of Non-Compliances and corrective actions' procedure.

In 2024, during internal environmental inspections, two non-compliances related to water were identified:

- a referral on water pollution and thus a breach of the environmental laws and/or regulations for which a fine of RON 12,500 was imposed. At the South Corunca Natural Gas Production Formation, an environmental incident was caused by the advanced corrosion of the produced water pipeline at the gas rig Corunca South 40, resulting in produced water leaks in the Vatman stream. Romgaz intervened to remedy the causes of the incident, replacing the damaged pipeline and thus ensuring that future leaks are prevented;
- non-compliance with the legal obligation to register a domestic wastewater treatment system at the local administrative unit.

The volume of water used by ROMGAZ Group is based on the needs approved through the water management authorizations for each site and based on the water supply subscriptions/contracts. With regard to pollution prevention and compliance with quality requirements, values monitored for effluents are required to comply consistently with the limitations imposed by applicable legislation (NTPA 001 and NTPA 002).

In the context of natural gas extraction activities, the produced water is managed in accordance with the Water Law No 107/1996, having been evacuated, transported and injected at the original parameters and properties, thus complying with the legal requirements and the Instructions "Measurement, Collection, Transport and Disposal of Produced Water" and its continually monitored through the company's internal mechanisms.

At the end of 2024, ROMGAZ Group completed the process of identifying locations situated in medium and high water stress area using the Aqueduct Water Risk Atlas application, but specific risks and additional measures related to water consumption in these areas have not yet been established. The company has budgeted for 2025 to carry out a study of 'Climate Risks and Vulnerabilities', which will also analyse in detail the impacts and risks associated with water resources.

For the management of accidental risks, ROMGAZ Group has developed contingency plans, has set up intervention teams and tested these plans, providing training for employees through planned training and simulations. In the case of accidental pollution, internal and external communication must follow the 'Communication' and 'Emergency preparedness and response' procedures.

In the case of new projects, the assessment of water resources and the impact on them, is carried out at the stage of obtaining the opinions and agreements provided for in national legislation. For areas already authorized, the situation should be reassessed in the framework of the technical documentation needed for re-authorization. If the use of water volumes is reduced or stopped, the authorizations are required to be amended in accordance with the new conditions in order to conserve the available water resources.

During 2024, the company did not have policies or practices related to the oceans and sustainable seas.

### **5.1.3 E3-2: Actions and resources related to water and marine resources**

ROMGAZ Group's environmental and water management activities are regulated under GEO nr. 195/2005 on environmental protection, with all additions and amendments, as well as under the Water Law No. 107/1996, as amended and supplemented.

ROMGAZ Group uses water for technological and sanitary purposes. Depending on the specific nature of the activity, for each location, the water supply is ensured via public water supply and sanitation operators, from underground sources (wells) or from surface sources.

ROMGAZ Group has implemented the following measures for water resource management:

- **Operational control** – Application of internal procedures for the monitoring and management of activities which may have an impact on water;
- **Personnel training** – Organization of training sessions on reducing environmental impact, including responsible use of water resources and compliance with environmental requirements, as well as training on the requirements of applicable SMI procedures/instructions;
- **Monitoring of discharges** – Carrying out monitoring of the quality of water discharged, at the frequency specified in the water management authorizations/environmental authorizations to ensure that the values comply with the limitations imposed by the legislation;
- **Disposal/recovery of liquid waste through authorized firms:** Selective collection in labelled containers, temporary storage in facilities specially equipped for risk mitigation, compliance with the prohibition of discharge into water and sewage, and the handing over of liquid waste to authorized operators for disposal or recovery;
- **Management of hazardous substances and preparations** - compliance with the hazardous substances legislation, compliance with the provisions of safety data sheets, training of staff handling these substances, strict record keeping, including on packaging, safe disposal when they become waste, application of the Contingency Plan for accidental pollution;
- **Fitting of oil recovery vats** - to prevent accidental spillage and efficient collection of residual oil;
- **Use of absorbent materials** - to manage accidental spillage of hazardous substances, thus reducing the risk of contamination;
- **Conduct of annual technical revisions and current repairs** – Ensuring the efficient and safe operation of equipment through regular inspections and repairs;
- **Maintenance of facilities and equipment** – Implementation of measures to prevent leakages and losses of water or contaminating substances;
- **Periodic environmental inspections** to verify compliance with legal requirements in relation to water;
- **Monitoring of impacts on surface and groundwater**, including through measurements made for wells according to water management authorizations.

The resources allocated for the implementation of these measures include investment in specific equipment, contracting of firms authorized for the management of liquid waste as well as the allocation of human resources for the implementation, monitoring and verification of these measures.

The assessment of compliance with the legal requirements of sites should be carried out in accordance with the instructions ‘Environmental inspection’ and the ‘Internal audit of the integrated management system’.

Below are the actions under way, started in 2024 to manage water resources responsibly for Romgaz and Depogaz.

For RBS that has office activity, no specific actions and resources have been set.



Romgaz action plan	Action 1	Action 2	Action 3	Action 4	Action 5	Action 6
<b>Actions</b>	Upgrading of collection and injection systems - Bozed produced water	Modernization of collection and injection systems – Hurezani Landfill	Building produced water evacuation system at Filitelnic Compression Station	Construction of fish ladder at the dam of the Iernut Power Plant	Compliance with legal requirements in relation to the quality of water discharged through mounting a Petroleum Products Separator at the Mures Branch (Compression Station)	Development of CTE Iernut through the construction of a new combined cycle thermal power plant with gas turbines
<b>Scope of the actions</b>	Extraction – own operations	Extraction – own operations	Extraction – own operations	Electricity generation – own operations – Ensuring the continuity of the Mureş river next to the outlet dam	Extraction – own operations	Electricity generation - own operations - resource use reduction, water efficiency by reducing the volume of cooling water discharged by about 90% compared to the current situation.
<b>Time horizon</b>	2024	2024 - 2025	2024	2024 - 2025	2024 - 2025	2024 - 2025
<b>Main actions and results</b>	Investment in rig 11 Bozed and Group 2 Bozed waste water injection plant 100% achieved	Completion of investment to replace the water supply line at the rig 180 Hurezani – 16,16 %	Investing in the produced water evacuation system at Filitelnic Compression Station 100% achieved	Ensuring the continuity of the Mureş River next to the outlet dam Investment realization 74,92%	Elaboration of the design theme Mount the separator	Work in progress
<b>Progress of actions</b>	Investment made under Environmental and Ecological Programme and 2024 Investment Plan	Investment in progress, according to the Environmental and Ecology Program and the 2024 Investment Plan.	Investment made under Environmental and Ecological Programme and 2024 Investment Plan	Investment in progress, according to Environmental and Ecological Programme and 2024 Investment Plan	Realization of the investment according to the Environmental and Ecological Programme and 2024 Investment Plan	Investment in progress, according to 2024 Investment Plan.
<b>Current financial resources</b>	Planned 130.00 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) Realized 131.12 thousand RON (according to 2024 Investment Plan) The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the additions to fixed assets note 12.	Planned 50.00 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) Realized 8.08 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the	Planned 1,615.00 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) Realised 1,667.03 RON according to Environmental and Ecological Programme and 2024 Investment Plan The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the	Planned 4,300.00 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) Realized 3,791.19 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the	Planned 30.00 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan) Realized 0,00 thousand RON (Environmental and Ecological Programme and 2024 Investment Plan)	Planned 348,656,00 thousand RON (according to 2024 Investment Plan) Realized 209,847.01 thousand RON (according to 2024 Investment Plan) The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the additions to fixed assets note 12.

		additions to fixed assets note 12.	additions to fixed assets note 12.	additions to fixed assets note 12.		
<b>Future financial resources</b>	-	41.92 thousand RON (the planned and realized difference in the 2024 Investment Plan) As a multiannual program, a future financial resource has been estimated as the difference between the total planned project and the year 2024, provided that this amount can be higher or lower.	-	1,078.51 thousand RON (the difference between the planned and realized amounts from 2024 Investment Plan) As a multiannual program, a future financial resource has been estimated as the difference between the total planned projects and the total realized projects for the year 2024, provided that this amount can be higher or lower.	30.00 RON (the difference between planned and realized in the 2024 Investment Plan) As a multiannual program, a future financial resource has been estimated as the difference between the total planned projects and total realized projects for the year 2024, provided that this amount can be higher or lower.	194,649.00 RON (the difference between planned and realized in the 2024 Investment Plan) As a multiannual program, a future financial resource has been estimated as the difference between the total planned projects and the total realized projects for the year 2024, provided that this amount can be higher or lower.

**Legend:**

PPME - Environmental Protection and Ecology Program

PINV - Investment Plan

Romgaz action plan	Action 7	Action 8	Action 9	Action 10	Action 11
<b>Actions</b>	Non-polluting discharge systems at rig group 8 Filitelnic	Non-polluting discharge systems at rig group 31 Filitelnic	Polistif tanks mounting at Group 10 and 34 Țaga	Water siphon collection mounting at Bozed field	Modification of the collector for Sădinca defoaming water reservoir
<b>Scope of the actions</b>	Own activities – Extraction – Disposal of wastewater losses	Own activities – Extraction – Disposal of wastewater losses	Own activities – Extraction – Disposal of wastewater losses	Own activities – Extraction – Disposal of wastewater losses	Own activities – Extraction – Disposal of wastewater losses
<b>Time horizon</b>	2024	2024	2024 - 2025	2024	2024
<b>Main actions and results</b>	Installation of the non-polluting discharge systems Done 100%	Installation of the non-polluting discharge system Done 100%	Polistif tanks mounting at Group 10 and 34 Țaga Getting construction authorization in progress	Water siphon collection mounting at Bozed field Done 100%	Modification of the collector for Sădinca defoaming water reservoir Done 100%
<b>Progress of actions</b>	Investment made under PPME and PINV 2024	Investment made under PPME and PINV 2024	Investment in progress, according to PPME and PINV 2024.	Investment made under PINV 2024	Investment made under PPME and PINV 2024
<b>Current financial resources</b>	Scheduled: 4,000 RON Done: 3,728 RON The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the additions to fixed assets note 12.	Scheduled: 4,000 RON Done: 3,354 RON The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the additions to fixed assets note 12.	Scheduled: 120,000 RON Done: 8,255 thousand RON The financial resources allocated in the year 2024 are shown in the consolidated annual financial statements under fixed assets additions note 12 and those in progress are classified as "investments in progress".	Scheduled: 4,000 RON Done: 3,614 RON The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the additions to fixed assets note 12.	Scheduled: 10,000 RON Done: 18,229 RON The financial resources allocated in 2024 are reflected in the annual consolidated financial statements in the additions to fixed assets note 12.
<b>Future financial resources</b>	-	-	111.74 thousand RON As a multiannual program, we estimated a future financial resource as the difference between the total projects planned and those carried out in the year 2024, provided that this amount can be higher or lower.	-	-

Depogaz action plan	Action 1
<b>Actions taken and planned</b>	Modernization of water cooling systems (Bilciurești Project)
<b>Scope of actions</b>	Natural gas injection into storage facilities – own operations, geographical area Romania, reduction of water use
<b>Time horizon</b>	2024 - 2027
<b>Main actions and results</b>	Start of investment on the modernization of cooling systems – stage of completion PINV Replacement of open-circuit cooling towers with closed-loop air/water cooling systems The modernization of the cooling system will improve the efficiency of technological cooling facilities by 35% and reduce water consumption by 90%.
<b>Progress of actions</b>	Start of execution work – First 3 months of 2025
<b>Financial resources</b>	Planned value = 45,394,369.70 RON Realized value = zero

Specific to Depogaz, during the extraction process, there is the possibility of generation of produced water. The produced water is temporarily stored in the collection tanks from which it is carried to the nearest injection station for reinjection.

Water consumption is a measure of efficiency with which company uses water resources.

Thus, the measures aimed at reducing water consumption at Romgaz are:

- Measures for the recovery and re-use of water that results from the well drilling activities. The water used and recovered is reused to prepare drilling fluids, thus reducing water abstractions and contributing to resource saving. The drilling fluids used are freshwater based and based on chlorides, avoiding the use of hazardous substances;
- At the compression stations at the production branches we have implemented measures for the phased replacement of natural gas compression aggregates from open-circuit cooling to closed-circuit cooling to minimize water consumption. The Company then planned to analyse the profitability of the implementation of this measure for other objectives;
- At SPEE Iernut, the degree of recirculation of water taken from the Mures River, according to the water management authorization, is set out in the following table:

Utilization	Daily water volume m <sup>3</sup>						Annual average	Degree of recirculation
	Water demand m <sup>3</sup>			Water requirement m <sup>3</sup>				
	Maximum*	Medium**	Minimum***	Maximum	Medium	Minimum		
Household use	310	200	170	310	200	170	113,15 ÷ 62	0%
Industrial purposes	2,495,246	597,130	276,310	2,495,246	597,130	276,310	910,764 ÷ 100,816.6	0% open system operation
				1,497,148	358,280	165,786	546,459 ÷ 60,511.9	40% mean recirculation
				628,802	144,505	69,630	229,512.7 to 25,414.9	74.8% maximum recirculation
Total	2,495,556	597,330	276,480	2,495,556	597,330	276,480	910,877.9 ÷ 100,915.2	0% open system operation
				1,497,458	328,410	165,956	546,572.2 ÷ 60,573.9	40% mean recirculation
				629,112	144,705	69,800	229,625.9 to 25,447	74.8% maximum recirculation

\* Maximum - Open mode operation

\*\* Medium - Mixed operation with R = 40 %.

\*\*\* Minimum - Operation at maximum recirculation R = 74,8 % (when all cooling towers are operating).  
Normally C.T.E. Iernut works in open water circuit.

The supply of technological water is provided from the Mureş River by means of a mobile-capture dam built in a minor riverbed and is used as cooling water (cooling of condensers, bearings, aggregates) and for the chemical treatment plant (filtration and dedurization) and treatment for the purpose of drinking. For the lowest possible consumption, for the technological process, the water used in the cooling system can also operate in the mixed system, i.e. part of the cooling water is recirculated, cooled and re-introduced into the cooling system.

The water used for the technological process is in principle subject to the following processing procedures: water withdrawal from the Mures River, pre-treatment of raw water (coagulation), dedurization, demineralization, mechanical filtration and neutralization. For the retention of pollutants from sewage water, there are several sewage plants before the water is discharged into the environment (Mureş River).

The water from the cooling of aggregates, potentially contaminated with oil particles, are collected by the drainage network and pumped into Mures river after it goes through four oil product separators. For technological waste water from ion filter regenerations, the unit is equipped with a neutralization facility and domestic sewage is purified through a mechanical-biological station.

SPPE Iernut holds a Water Management Authorization for Water Supply and Wastewater Discharge at SPEE Iernut – Centrala Termoelectrică Iernut (CTE). Under this authorization, CTE Iernut is required to comply with the provisions of the restriction plans drawn up for periods of drought, i.e. the provisions of the plans to protect against floods, dangerous weather conditions or accidents at hydrotechnical constructions. There is also a Plan to prevent and combat accidental pollution in water use within SPEE Iernut, which shows the main sources that can lead to water pollution, how to respond in the event of pollution, intervention teams, etc.

For the control of the quantities and quality of discharged water, ROMGAZ Group conducts actions and allocates resources dedicated to managing the impact on water resources and groundwater (maintenance of sludge separators and petroleum products, maintenance of pre-treatment and treatment stations, modernization of produced water injection systems).

ROMGAZ Group promotes the sustainable use of water by implementing measures to ensure the long-term protection of available water resources. Sewage is tested and water indicators are monitored according to the requirements of the applicable regulations. These analyses are carried out by own laboratories and in approved laboratories and are subject to an internal monitoring plan which complies with current regulations, including NTPA 001/2002 and NTPA 002/2002. Depending on the specific nature of each activity and the technical equipment of each site, sewage is discharged after pre-treatment in sewage plants, either in public sewage networks or in natural environment, and is injected into authorized injection rigs.

For the value chain, the measures concern activities carried out by third parties on behalf of ROMGAZ Group. They are governed by commercial contracts which include environmental protection requirements. Thus, in accordance with the 'Establishment of health and safety at work, environmental protection and emergency requirements when purchasing products, services, works', the Environmental Protection Service develops specific environmental requirements for each type of procurement. Before contracts are signed, the existence of mandatory documents required at the award stage (e.g.: environmental permit) as well as compulsory documents to be submitted by the successful tenderer after the outcome of the procurement procedure has been communicated (environmental permits of subcontractors, contracts for recovery/disposal, contracts for take-over, sewage disposal, road transport attestations/authorizations, etc.).

## **5.2 Metrics and targets**

### **5.2.1 E3-3: Targets related to water and marine resources**

Water resource targets are set for the year and the resources necessary to achieve the objectives are included in the Annual Investment Plan and the Annual Procurement Plan. Targets are set in accordance with legal requirements and without stakeholder consultation.

ROMGAZ Group subsidiaries independently set water targets. Thus, for the reporting period 2024 they were:

### Romgaz

The targets that were set for 2024 were linked to the objectives and the IMS Policy aimed at reducing the negative impact on water.

For 2024, the company set and reached the following targets on reducing the negative impact on water:

Target set	Target touch level
100% compliance with legal environmental requirements	98,04% (2 environmental incidents relative to 102 authorized sites)
0 uncontrolled losses of produced water	100%
100% monitoring carried out/planned	100%
90% of scheduled inspections to take place	100%

The location of the company's activities in the proximity of aquatic ecosystems and protected areas, such as Natura 2000 sites, involves the implementation of specific measures to protect biodiversity and maintain ecological balance.

Romgaz is active in the proximity of Natura 2000 sites as follows:

- **RO SPA 0041 – Hernut-Cipău Eleșteiele**, 850 m away from the company's site, representing an area of bird protection;
- **RO SCI 0210 - Lechinta River**, adjacent to SPEE Iernut, which protects natural habitats such as subpannonian steppe grasslands, amphibians, reptiles and fish.

The direct impact of activities on biodiversity in these protected areas is managed through monitoring and prevention measures. For example, pollution from point sources, such as the discharge of cooling waters at high temperatures in the Mures river, is carefully monitored, especially during sensitive periods, such as the breeding period of fish.

At SPEE Iernut's level, Romgaz implements measures to minimize the impact on water resources and biodiversity, such as:

- Achieving longitudinal connectivity of the Mures river at the outlet dam;
- Low-yield fish building works facilitating species migration;
- Continuing the monitoring of the fish populations of the river Mures, which has identified both species mentioned in the Natura 2000 site master sheets and additional species of community interest, such as the dunărița (*Sabanejewia aurata*) or zvârluga (*Cobitis elongatoides*).

Continuous monitoring indicates that the impact on biodiversity is managed in accordance with environmental requirements and that fish species are protected, including through control measures on the temperature of the water discharged, which remains within legal limits and does not exceed the values set out in the water management authorizations. Thus, the topic of biodiversity is integrated in water resource management, with a focus on maintaining the equilibrium of aquatic ecosystems, reducing the impact on habitats and protecting species of community interest.

In 2024, the monitored indicators indicated in the environmental/water management permits for each site complied with the allowed values for effluents, in accordance with current legislation, ensuring the protection of water resources. Indicators can be found in the Measurement Monitoring Registry, published on a quarterly basis on the Romgaz external website (Metering-Monitoring Environmental Factors Registry III 2024 | Romgaz). Analysis reports are to be found in the Environmental Protection Services/offices of branches/subsidiaries.

### Depogaz

Depogaz set the objective for the period 2024-2027 of modernizing water cooling systems in the Bilciurești Project, aligned with the IMS policy. The target set is to reduce the amount of

water consumed in gas storage injection operations by 90% in order to make the use of water resources more efficient. This target is voluntary.

Romgaz and Depogaz do not carry out activities involving the use of marine resources and the discharge of water is managed according to legal requirements and water management authorizations. In this context, no specific targets have been set for this issue.

## RBS

In the reporting year, RBS carried out only office activities and there were no targets for the use of water resources.

### 5.2.2 E3-4: Water consumption

The largest amount of water in ROMGAZ Group is used by Iernut. The supply of technological water is coming from the Mureş River by means of a mobile capture dam built in a minor riverbed and is used as cooling water (cooling of condensers, bearings, aggregates) and for the chemical treatment plant (filtration and dedurization) and treatment for the purpose of drinking. For the lowest possible consumption, for the technological process, the water used in the cooling system can also operate in the mixed system, i.e. part of the cooling water is recirculated, cooled and re-introduced into the cooling system.

The water used for the technological process is in principle subject to the following processing procedures: Water abstraction from the Mures River, pre-treatment of raw water (coagulation), dedurization, demineralization, mechanical filtration and neutralization. For the retention of pollutants from waste water before discharge into the sewage network and thus into the environment (River Mures), there are several sewage plants.

The cooling water from aggregates, potentially contaminated with oil particles, are collected by the drainage network and pumped through four oil separators before being discharge into Mures River. For technological waste water from ion filter regenerations, the unit is equipped with a neutralization facility and domestic sewage is purified through a mechanical-biological station.

Water withdrawals are monitored on a daily basis, as this plays an important role in the calculation of the electricity production price and is largely influenced by the following factors: production, malfunctions, number of stoppages/starts, water temperature (captured from the river Mures), Mures river level.

The measurement/calculation methodologies are those set out in legal requirements. They did not change during the reporting period. The information is not externally audited.

Category	ROMGAZ Group	Romgaz	Depogaz	RBS
	2024	2024	2024	2024
Water draw-ups [m3]	108,859,667	108,816,292*	42,765	610
Discharges of water [m3]***	108,139,654	108,131,474**	7,570	610
Total water consumption [ m <sup>3</sup> ]	720,013	684,818	35,195	0
Total water consumption in areas of hydrological risk, including areas with high water stress [m <sup>3</sup> ]	673,222	673,222****	0	0
Total amount of recycled and reused water				
Total amount of stored water and changes in storage [m <sup>3</sup> ]	3,700	2,770****	930	0

\*Of which SPEE Iernut water sampling is 108,648,010 [m<sup>3</sup>].

\*\*Of which water discharges for SPEE Iernut are 107,974,788 [m<sup>3</sup>].

\*\*\*Quantities of water discharged by branches are estimated and cannot be accurately documented. On the other hand, there is an exhaust metering system in SPPE Iernut, so that only the consumption recorded at this branch will be considered as material.

\*\*\*\*Reported water consumption comes almost entirely from the Iernut branch, which accounts for 93.5 % of ROMGAZ Group's total water consumption. Iernut is located in a medium and high water stress area, which is why only this consumption is included in the reporting. For the other Depogaz units, RBS and Romgaz branches, only sanitary discharge water is monitored.

\*\*\*\*\*Amount of water stored by SPPE Iernut; Background information: 3 x 400 mc PSI 3 x400 mc water storage tanks - potable water tanks and fire-fighting; 1x570 mc drinking water pool for firefighting in sprayed water at the new plant; 2x500 mc waste water tanks used for cooling at the new plant



**Water consumption intensity** (total water consumption in its operations (m<sup>3</sup>) per net income in million RON).

Water consumption intensity 2024	<b>90.80</b>
Total water consumption in its operations, in m <sup>3</sup>	720,013.00
Net income in millions of RON	7,929.44

### 5.2.3 E3-5: Anticipated financial effects from water and marine resources-related impacts, risks and opportunities

ROMGAZ Group applies the phasing-in provisions of ESRS 1 Appendix C for the ESRS E3-5 requirement for the anticipated financial effects of impacts, risks and opportunities related to water and marine resources.

Thus, in the first reporting year under the ESRS standard, ROMGAZ Group will not provide the information asked for under this requirement. This approach reflects the need to develop in the coming years internal processes, monitoring tools and infrastructure necessary to meet the more complex requirements of ESRS.

## 6 ESRS E5 - Resource use and circular economy

### 6.1 Interaction with other ESRS

The circular economy material topic at ROMGAZ Group is closely linked to all other environmental topics. Circular economy plays a crucial role in resource efficiency and waste minimization, having a significant impact on the environment and communities (thus a close link with environmental and social ESRSs).

ROMGAZ Group's most significant impact on air is caused by greenhouse gas emissions, covered in detail in ESRS E1 – Climate change section. The implementation of circularity principles for the value chain as well as for waste management could have the effect of reducing emissions from Scope 3. The impact on water resources is covered in the ESRS E3 – Water and marine resources section, as it is related to the Company's direct water withdrawals/consumption quantities and management of liquid waste.

Resource use and circular economy impacts can affect people and communities. Inefficient use of resources throughout the value chain and for its own activities, as well as waste management can lead to environmental pollution problems. These matters are detailed in ESRS E2 – Pollution section.

For its own operations, situations of faulty waste management may occur:

- In the event of technical or human errors. This aspect is part of the efforts to maintain the process and employees safety and is addressed in the ESRS S1 – Own workforce – Health and Safety section.
- In instances of mismanagement of waste generated by ROMGAZ Group activities.

### 6.2 Impact, risk and opportunity management

#### 6.2.1 ESRS 2 IRO-1: Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

Internally, environmental aspects and impacts, including those related to resource and waste management, have been identified and assessed based on evaluation criteria under different operating conditions (normal, abnormal and reasonably foreseeable emergencies), in accordance with the "Identification and assessment of environmental aspects" system procedure and the ESRS double materiality assessment framework.

ROMGAZ Group operates on a value chain consisting of natural gas exploration, extraction, processing, transportation, distribution and commercialization. Each stage involves the use of a variety of material resources to carry out activities, both in the upstream (exploration and production) and downstream (transport, storage, and distribution) sectors.

Thus, the material resources used by ROMGAZ Group are:

- Industrial and technological equipment: drilling equipment (drill wells, extraction equipment), natural gas compression stations, gas processing systems (dehydration, separation, treatment);
- Pipelines and transport systems: extraction and distribution pipelines, valves, compressors and monitoring systems;
- Raw materials and consumables: chemicals for drilling and gas treatment, as well as for machinery and transportation;
- IT systems and automation: software for production monitoring and network management, along with SCADA systems for remote control and surveillance;
- Other resources: spare parts for machinery, work protection equipment for employees.

In 2024, ROMGAZ Group's specific operational procedures and context, the maturity in value chain management and the laws applicable for public procurement, as well as the ESRS provisions on the identification of material environmental risks, opportunities and impacts were taken into account during the double materiality assessment. Hence, impacts, risks and opportunities related to the topic of "Circular Economy" (including its associated sub-topic) were assessed in alignment with AR 16 of ESRS 1.

As part of the double materiality assessment process for ESRS E5, resource inflows, including resource usage and waste were identified as material topics, while resource outflows related to products and services were deemed non-material for ROMGAZ Group, due to the type of product/service that is commercialized by the Company. The assessment revealed that the material impacts, both positive and negative, is significant for these material topics. However, although the associated risks and opportunities were considered in the assessment process, they were not evaluated/identified as material.

The double materiality assessment also included consultations with internal and external stakeholders, including local communities, regulatory authorities and business partners.

In the table below, the positive and negative impacts identified for the material topics, as well as their location, type and time horizon are presented.

## IRO on Inflows, including resource use and Waste

### Legend:

Type of impact: F = financial impact, M = material impact, MF = material and financial impact

Time horizon: A = current impact (reporting year), P = potential impact (medium and long term)

Source of impact: S = impact arising from strategy and business model, B = impact underpinning strategy

Material topic, Material sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Circular economy <b>Resource inflows, including resource use</b>	Upstream, downstream, own operations	M	B	A	ROMGAZ Group has an annual procurement/investment plan that follows the business strategy. In addition, ROMGAZ Group develops an “Annual Waste Prevention and Reduction Program”. This aims to optimize the use of resources (e.g., reuse of some materials).	A	Negative impacts arise for their own operations but also in the value chain. Inefficient use of resources can generate higher acquisition costs (over-sized purchases), surplus raw materials and materials that can become waste. They can also generate additional management costs and the exhaustion of types of resources that are not used responsibly.	-	-
Circular economy <b>Waste</b>	Downstream, own operations	M	S	A	Annual waste prevention and reduction program.	A	Improperly managed waste can have a significant negative impact on both the environment and people. Waste is generated not only from its own operations, but also throughout the value chain.	-	-

## 6.2.2 E5-1: Policies related to resource use and circular economy

ROMGAZ Group does not have policies that explicitly include provisions for the circular economy. Below are ROMGAZ Group's policies and documents that address only certain aspects of the circular economy, and the impacts identified as material.

### Policies on resource inflows

The general objectives of the Romgaz's Policy Statement on Quality, Environment and Occupational Health and Safety include, among others, pollution prevention and the reduction of adverse environmental effects. However, they do not include specific objectives on the topic of circularity.

Therefore, at this point in time, it is not possible to calculate a degree of circularity of the products and services purchased for the reporting year.

Regarding quitting the use of virgin resources, Romgaz does not utilize products made from secondary (recycled) resources in its activities. The procurement procedure in force during the reporting period did not include specific provisions regarding circularity. At the end of 2024, an internal process was launched to develop "Romgaz's Responsible and Sustainable Procurement and Sourcing Policy", which includes elements of circularity, and it was approved at the beginning of 2025.

Depogaz and RBS do not currently have policies that specifically address the circular economy.

### Policies related to waste management

The policies of the integrated management systems (IMS) of Romgaz and Depogaz are aligned, making the following information applicable to both entities.

The environmental management system, certified according to ISO 14001:2015 requirements, includes, among other aspects, waste management. Thus, at the ROMGAZ Group level, the operational procedure "Waste Management" has been adopted, which establishes how to carry out the collection, temporary storage, transportation, recovery and disposal of all waste generated from the activities carried out within the Company, in compliance with the applicable legal requirements. Additionally, ROMGAZ Group has implemented a work instruction titled "Management of waste resulting from office activities", which establishes rules on the adoption of an eco-responsible behaviour among employees.

The primary responsibility for the implementation and monitoring of the IMS components, including those related to waste, lies with the Company's General Director. The recertification process takes place every 3 years, and surveillance audit is conducted annually.

For efficient waste management, ROMGAZ Group prepares the "Annual Program for the Prevention and Reduction of Waste." The program is based on a hierarchy of waste management options, with waste prevention as the first priority, achieved by selecting the best technologies from the design phase. The plan states that when the avoidance of waste generation is impossible, the Company seeks to minimize the amount generated by identifying reuse, recycling, and energy recovery options. The plan provides that when avoiding waste production is not possible, the Company aims to minimize the amount generated, by identifying options for their reuse, recycling and energy recovery, as a way to keep the resources in the system for as long as possible (the connection with the principles of the circular economy).

Regarding the value chain, prior to the commencement of work carried out by third parties, they are instructed on the environmental considerations included in the contract, including the provisions of the IMS policy and the aspects related to waste management.

RBS, in relation to the current office operational activity, has implemented a "Procedure for the prevention of waste generation and management". The purpose of this procedure is to cover the office activities, to track and document all waste streams, to develop and apply ways to prevent waste generation and to demonstrate compliance with Romanian legislation and international standards. Moreover, for a better management of SGR-labelled packaging, RBS has implemented an instruction for the separate collection of such packaging and its delivery to collection centers for deposit recovery.

When establishing the “Policy Statement on Quality, Environment and Occupational Health and Safety”, ROMGAZ Group paid close attention to stakeholders. They are consulted whenever required by legislation, and the policy is accessible through multiple channels:

- For employees, it is displayed on the Company’s intranet and supported by training sessions, according to the “Environmental Training” instruction, and whenever it is revised;
- For the public and other stakeholders, the policy is published on Company official website;
- For contractors and suppliers, before commencing any work performed by third parties for or on behalf of the Company, they are instructed regarding the environmental requirements included in the contracts, as well as the provision of the Integrated Management System (IMS) policy.

Environmental complaints can be submitted by any stakeholder via e-mail, using the addresses [secretariat@romgaz.ro](mailto:secretariat@romgaz.ro), [comunicare@romgaz.ro](mailto:comunicare@romgaz.ro), available on the Company’s external website.

### **6.2.3 E5-2: Actions and resources related to resource use and circular economy**

#### **Actions for the material topic – Resource inflows, including resource use**

At the end of 2024, an internal process was launched to develop a “Responsible and Sustainable Procurement and Supply Policy”, including elements of circularity. This policy has been approved at the beginning of 2025, and its content and objectives will be included in the next reporting exercise.

#### **Actions for the material topic – Waste**

Below is the presentation of the actions taken in 2024 by Romgaz, Depogaz and RBS to manage and reduce the environmental impact of their operations, with a focus on waste management.

Romgaz	Action 1	Action 2	Action 3	Action 4	Action 5	Action 6
<b>Actions taken in the reporting year</b>	Preparation of the Waste Prevention and Reduction Program (PPRD)	Purchase of environmentally friendly products, services and works	Selective waste collection	Economic recovery of waste	Reduction of industrial waste quantities and selective waste collected generated at Romgaz sites	Compliance with waste related legal requirements, as well as with requirements imposed by integrated environmental permits
<b>Scope of actions</b>	All Romgaz site - waste management	Procurement services, Environmental Protection and Romgaz Beneficiary Organizational Units - integration of environmental principles in the procurement program	All Romgaz site - increasing the amount of recycled waste	All Romgaz sites - increasing the amount of recycled waste	All Romgaz sites - increasing the amount of recycled waste	All Romgaz sites - respecting environmental requirements
<b>Time horizon</b>	31 May 2025	For each procurement of products, services or works which may include environmental requirements.	Permanent	Permanent	Permanent	Permanent
<b>Main actions and results</b>	Data collection, centralization and reporting for 2024	Imposing environmental requirements on procurement.  Reducing the hazardousness of the waste generated.	Training of the Company's employees  Providing containers/bins for selective collection  Management according to legal requirements for selectively collected waste	Analysis of waste management operators in the vicinity of waste generation areas for the purpose of identifying waste recovery solutions. Commercialization of waste versus final disposal (method involving costs). Reduction of waste quantities finally disposed.	Training of the Company's employees. Reduction of waste quantities.	Training of employees Compliance with legislation and legal requirements in regulatory acts Ensuring the continuity of industrial waste collection service contracts. Conduct of regular training Verification of selective waste collection

<b>Progress of actions</b>	Reduction of waste quantities according to targets set for 2024 for each authorized Romgaz objective	Commencement of Romgaz's "Procurement and Sustainable supply" policy.	0 fines	Increasing the rate of waste recovery	Reduction of waste according to targets set for 2024 for each authorized Romgaz site	6 non-compliances opened in internal inspections, of which 2 closed at term and 4 opened within the term
<b>Current and future financial and other resources allocated to the action plan</b>	For the preparation of the PPRD, no financial resources are needed, only human and informational	Internal human resources	Financial resources 1,223,789.93 RON (cumulative for activity 3 and 5) from internal sources Information resources Human resources  The financial resources allocated in 2024 are reflected in the consolidated annual financial statements under other expenses.	Information resources  Human resources	Financial resources 1,223,789.93 RON (cumulated activity 3 and 5) from internal sources Information resources Human resources  The financial resources allocated in 2024 are reflected in the consolidated annual financial statements under other expenses.	Information resources Human resources

Note: In the Waste Prevention and Reduction Program - prepared in 2024 for the year 2023 - the progress made in reducing and preventing waste quantities was monitored, with 2022 as the reference year. Additionally, this program specifies the targets proposed for 2024. The progress made and the achievement of the targets proposed for 2024 will be included in the new program, which is due to be completed by May 31, 2025, according to Law no. 92/2021 - regarding waste management.



In addition, through specialised training carried out in 2024, staff were trained to reduce consumption of materials and to selectively collect the waste from their operations for reintroduction into the economic cycle.

Romgaz operates a facility in Ogra, Mureş County, for the treatment and storage of specific waste generated from natural gas field exploitation. In accordance with the provisions of GD no. 349/2005, which was repealed and replaced by EO no. 2/2021 on waste storage, Romgaz established a fund in 2006 for a 20-year period to cover closure and post-closure activities. The annual contribution to the fund was set at 83,885.08 RON per year, or 20,971.27 RON per quarter. At the end of 2024, the account balance stands at 1,614,847.02 RON; additional information can be found in the Consolidated Administrators' Report.

### Depogaz

DEPOGAZ	Action 1	Action 2
<b>Actions taken and planned</b>	Preparation of the Waste Prevention and Reduction Programme	Selective waste collection
<b>Scope of actions</b>	All Depogaz Workstations - reduction of waste quantities	All Depogaz Workstations - increasing the recycling level
<b>Time horizon</b>	31 May 2025	Permanent
<b>Main actions and results</b>	Plan developed and followed during the year	Selective collection and recovery
<b>Progress of actions</b>	fulfilled	fulfilled
<b>Current and future financial and other resources allocated to the action plan</b>	No financial resources are needed for the preparation of the PPRD, only human and information resources	Financial resources: 11,235 RON Information resources Human resources  The financial resources allocated in 2024 are included in the consolidated annual financial statements under the line other consumables.

The resources allocated for the implementation of actions related to the use of resources and circular economy include human, information and financial resources, according to “Investment Plan” and the “Procurement Plan”.

Based on the current policy, from a quantitative point of view, waste prevention at Romgaz is achieved by:

- Optimizing waste-generating production processes;
- Acquisition of high-quality materials which have a longer lifespan;
- Establishment of systems to collect potential waste oil spills from the storage platform;
- Scrapped or repaired products/components are subject to selective sorting, repair and storage in storerooms for further use;
- Recovery of waste products, components and materials in preparation for their re-use and recycling. For example, Romgaz practices the reuse of a product (drilling mud) which has not changed its properties (composition, density) for operations carried out as part of the same activities and which require the use of this product;
- Establishing industrial symbiosis by transforming the organization's waste or by-products from production into input for another organization;
- Purchase of products without excessive packaging;
- Reuse of materials and equipment;
- Acquisition of rechargeable batteries vs. disposable batteries;
- Purchase of ecological cleaning products, free of propellants, with refilling systems and recyclable packaging.

From a qualitative point of view, prevention is achieved by reducing the hazardous nature of waste, in particular by minimizing the content of hazardous and/or toxic substances.

As part of the Company's digitalization and paper use reduction efforts, the following actions were implemented:

- Setting printers in two-sided and black and white printing mode;
- Use of documents in electronic format as a priority;
- Archiving documents in electronic format;
- Editing documents with smaller fonts;
- Reuse of paper (drafts).

Prevention of generation of industrial waste is achieved by:

- Monitoring the recovery of the waste oil generated in the compression stations, to ensure a recovery and valorisation degree as high as possible and to identify potential losses in the technological process;
- Preventing the generation of waste from ferrous filings and shavings waste maintenance to be achieved through employee awareness raising. At the same time, the recovery and re-introduction of these types of waste into the trading chain is encouraged.

Romgaz has also ensured the necessary infrastructure for selective collection (suitably marked containers, domestic bags) and trained staff to ensure the selection and handling of the waste generated by Romgaz activities. At the level of each site, the waste generated is temporarily stored at sites specifically designated for that purpose, with hazardous and non-hazardous waste being separated for the purpose of handing it over to authorized economic operators.

Third-party waste management involves waste collection, transport, recovery and monetization/disposal, as well as supervision of such operations. Romgaz contracts specify third parties' obligations when managing Romgaz's waste, based on the current legal provisions, such as local environmental laws and regulations, to ensure that third parties manage waste properly. Romgaz did not conduct audits of these suppliers during the reporting period.

#### **Depogaz**

At Depogaz, third-party waste management involves waste collection, transport, recovery and disposal, as well as monitoring these activities and the subsequent maintenance of disposal sites. Depogaz specifies in contracts with third parties the obligations to be complied with for proper waste management, in accordance with local legislation and environmental regulations. Depogaz thus ensures that waste is properly managed. Depogaz did not conduct audits of these suppliers during the reporting period.

#### **RBS**

In 2024, RBS implemented the "Waste Prevention and Management Procedure", covering, but without being limited to, waste management records, temporary storage, waste treatment and transport, waste disposal, waste valorification etc. in compliance with all legal requirements. During the first part of 2024, the Company had a contract with "Viitor Plus" Association which, through RECICLETA program, provided collection services for recyclable materials such as paper, cardboard, PET, TetraPak, and aluminum doses. This was a social initiative where materials were transported without polluting the atmosphere, by using cargo-tricycles and electric cars, simultaneously providing sustainable jobs.

Subsequently, the process of selective waste collection was taken over by the administration of the office building in which RBS operates. The building administration holds a contract with Bucharest District 1 waste collection company, which provides for the collection, transport and further recovery, recycling and final disposal in accordance with legal provisions on environmental protection.

The assessment of ROMGAZ Group's waste management activities is carried out by environmental protection services, in the framework of internal environmental inspections under the "Environmental Inspection" occupational instruction and by the Integrated Management Service, in the framework of internal audits, carried out under the "Integrated Management System Internal Audit" procedure. The adequacy of waste management is also assessed by the control bodies of the County Commissioners of the National Environmental

Guard and the Water Basin Administrations. During 2024, 26 such verifications occurred, no waste management non-compliances being identified.

## 6.3 Metrics and targets

### 6.3.1 E5-3: Targets related to resource use and circular economy

ROMGAZ Group has no long-term targets set according to ESRS requirements.

Targets are set annually. When defining the annual targets, the provisions of current regulations, such as GEO No. 92/2021, Order of the Minister of Environment No. 1946/2024 and Law No. 132/2010 are taken into consideration.

External stakeholders were not consulted for the purpose of setting targets. Targets cover ROMGAZ Group's own operations.

The targets set for 2024 cover the waste generated.

For Romgaz these targets included:

- 0 administrative fines - target 100% achieved
- 100% Non-compliance reports closed/opened - target achieved
- 0 deviations from the applicable legislation - target achieved.

For Depogaz, the target was to reduce by 1% the quantities of paper and cardboard packaging waste compared to 2023.

For the reporting year RBS did not specifically have defined and measurable targets.

### 6.3.2 E5-4: Resource inflows

Depending on the specific activity of each location, Romgaz uses various resources. These are:

- Products: natural gas, condensate, chemical adjuvants (corrosion inhibitors, demulsifiers), technological liquids (drilling fluids, additives);
- Packaging: metal containers, casks, tanks, big bag sacks;
- Materials: pipes, fittings, drilling equipment, separators, insulating materials, consumables (lubricants, linings);
- Romgaz uses various tangible assets essential for carrying out its operations and activities in the upstream value chain, such as:
  - Industrial equipment: wells, compression and treatment plants, transport pipes;
  - Infrastructure: administrative and industrial buildings, drilling platforms, monitoring and control systems;
  - Vehicles and machinery: necessary for the transport of personnel and materials.

Depogaz uses the following in the production process:

- Products: natural gas.
- Packaging: metal containers, casks, tanks.
- Materials: pipes, fittings, separators, insulating materials, consumables (lubricants, linings).

Depogaz uses various tangible assets essential for carrying out its operations and activities in the upstream value chain, such as:

- Industrial equipment: wells, compression and treatment plants, transport pipes.
- Infrastructure: administrative and industrial buildings, drilling platforms, monitoring and control systems.
- Vehicles and machinery: necessary for the transport of personnel and materials.

Currently, these products and services are not assessed in terms of circularity and ROMGAZ Group does not use circularity indicators in the procurement criteria.

### 6.3.3 E5-5: Resource outflows

Romgaz						
a) Total amount of waste generated [t]	4,504.95					
b) Total amount for which disposal has been avoided [t]	Hazardous waste diverted from disposal [t]			Non-hazardous waste diverted from disposal [t]		
	Preparing for re-use	Recycling	Other recovery operations	Preparing for re-use	Recycling	Other recovery operations
1,215.52	0	463.07	4.47	0	716.55	31.43
(c) Total amount of waste to be disposed [t]	Total amount of hazardous waste directed to disposal [t]			Total quantity of non-hazardous waste directed to disposal [t]		
	0.63			3,218.22		
	of which a breakdown after disposal operations:			of which a breakdown after disposal operations:		
	Incineration	Deposit	Other disposal operations	Incineration	Deposit	Other disposal operations
3,218.85	0.13	0.5	0	0.01	3,218.21	0
d) Total amount of unrecycled waste	Total quantity in tons			Percentage of total waste		
	3,254.76			72.25%		

Depogaz						
a) Total amount of waste generated [t]	253.31					
b) Total amount for which disposal has been avoided [t]	Hazardous waste diverted from disposal [t]			Non-hazardous waste diverted from disposal [t]		
	Preparing for re-use	Recycling	Other recovery operations	Preparing for re-use	Recycling	Other recovery operations
23.55	0	20.93	0	0	0	2.62
(c) Total amount of waste to be disposed [t]	Total amount of hazardous waste directed to disposal [t]			Total amount of non-hazardous waste directed to disposal [t]		
	3.25			221.78		
	of which a breakdown after disposal operations:			of which a breakdown after disposal operations:		
	Incineration	Deposit	Other disposal operations	Incineration	Deposit	Other disposal operations
225.03	1.57	0	1.68	0	150.264	71.517
d) Total amount of unrecycled waste	Total quantity in tons			Percentage of total waste		
	227.65			90.70%		

RBS						
a) Total amount of waste generated [t]	1.19					
b) Total amount for which disposal has been avoided [t]	Hazardous waste diverted from disposal [t]			Non-hazardous waste diverted from disposal [t]		
	Preparing for re-use	Recycling	Other recovery operations	Preparing for re-use	Recycling	Other recovery operations
0.27	0	0	0	0		0.27
(c) Total amount of waste to be disposed [t]	Total amount of hazardous waste directed to disposal [t]			Total amount of non-hazardous waste directed to disposal [t]		
	0			0.92		
	of which a breakdown after disposal operations:			of which a breakdown after disposal operations:		
	Incineration	Deposit	Other disposal operations	Incineration	Deposit	Other disposal operations
0.92	0	0	0	0.92	0	
d) Total amount of unrecycled waste	Total quantity in tons			Percentage of total waste		
	1.19			0%		

ROMGAZ Group						
a) Total amount of waste generated [t]	4,759.45					
b) Total amount for which disposal has been avoided [t]	Hazardous waste diverted from disposal [t]			Non-hazardous waste diverted from disposal [t]		
	Preparing for re-use	Recycling	Other recovery operations	Preparing for re-use	Recycling	Other recovery operations
1,239.34	0	484	4.47	0	716.55	34.32
(c) Total amount of waste to be disposed [t]	Total amount of hazardous waste directed to disposal [t]			Total amount of non-hazardous waste directed to disposal [t]		
	3.88			3,440.92		
	of which a breakdown after disposal operations:			of which a breakdown after disposal operations:		
	Incineration	Deposit	Other disposal operations	Incineration	Deposit	Other disposal operations
3,444.80	1.7	0.5	1.68	0.01	3,369.394	71.516
d) Total amount of unrecycled waste	Total quantity in tons			Percentage of total waste		
	3,483.60			73.19%		

## Romgaz

Romgaz generates a variety of waste from its exploration, drilling, processing and transport activities, each waste stream having a specific material composition.

**Drilling mud waste:** These types of waste result from major repairs, special operations and wells production trials. The categories of mud waste resulting from the operations listed above are:

- Freshwater drilling waste and mud, code 01 05 04;
- Drilling mud containing barite, code 01 05 07;
- Chloride-containing drilling mud, code 01 05 08.

This waste is disposed of by authorized firms. The operations carried out by these firms are:

- Treatment with different chemicals (to reduce hazard);
- Centrifugation (for separation of solid part from liquid part);
- Final storage in stores which comply with regulations.

**Scrap metal:** This waste results from scrapping operations of fixed assets which can no longer be used in the production process, due to technical wear and tear and obsolescence costs of which are very high, i.e. from work by cutting in mechanical workshops. The main categories of waste in this stream are:

- Ferrous swarf, code 12 01 01;
- Ferrous metals, code 16 01 17;
- Non-ferrous metals, code 16 01 18;
- Iron and steel, code 17 04 05.

Metal scrap is monetized based on the contracts concluded with authorized economic operators.

**Electrical and electronic equipment and waste (EEEW):** This waste, code 20 01 36, consists of end-of-life products and includes a wide range of electrical and electronic items such as IT and telecommunications equipment, electrical and electronic tools, monitoring and control tools, refrigerators, etc. It is collected and handed over to authorized economic operators.

**Solid impurities waste.** This waste results from extraction after natural gas separation and includes "underground water" and solid impurities. Mechanical impurities are classified according to the GD No. 856/2002 as follows:

- Sludges from physical-chemical treatment other than those specified in code 19 02 05 (code 19 02 06);
- Other unspecified waste from gas cleaning (code 05 07 99). This waste is generated on a continuous basis, with the cleaning of separators and collecting/storing pools.
- Legal methods of processing, incineration or storage are used for the controlled disposal of such waste. Romgaz removes these categories of waste by depositing it in its own warehouse in Ogra, Mures county and with other authorized economic operators.

**Triethylene glycol (TEG) waste:** The main waste generated by the natural gas drying activity is the used TEG, contaminated with chlorides from the well-killing fluid and fractions in the enclosed gas, which affect the viscosity and structure of the TEG. During the drying process, the TEG parameters change, the triethylene glycol content decreases and the chlorine content increases, thus becoming waste. Significant amounts of waste from the TEG are generated annually, which, although not classified as hazardous, has high disposal costs. From the analyses carried out and the analysis of the origin and composition of the waste, it has not shown any hazardous substances classified by the legislation at concentrations which would give the waste a dangerous character (free of heavy metals, mononuclear and polycyclic aromatic

hydrocarbons – BTEX and PAH). The waste has very low concentrations of oil hydrocarbons in the range C12-C40 corresponding to oils and lubricants. The assessment of the TEG waste, according to the technical file and laboratory analyses, has shown that it falls under code 07 99 "Other unspecified waste – from gas purification-TEG".

Although it is a non-hazardous liquid waste, it has limited possibilities for controlled disposal, through storage in authorized storage or incineration. For efficient management, Romgaz analyses and implements gas conditioning with delicate salts, as this process does not generate waste.

**Used oils waste:** Collected waste oils may be redistilled for recycling and mixing in lubricating oil plants, or recovered for energy, as referred to in the EU Directive on waste incineration. The reduction in the amount of oil that has become waste is carried out in accordance with the requirements of the manufacturer of the compressors.

A monthly report on the recovery of waste oils from the lubricating oil used was drawn up to monitor the recovery of the waste oil generated from the gas compression plants. Waste oils from the activity of Romgaz are industrial oils and lubricants on a mineral, synthetic or biogenic basis, which have become unsuitable for initial use, particularly those oils from combustion engines and transmission systems, lubricating oils, turbine oils, hydraulic and industrial systems.

Waste oils are classified as hazardous waste under the law and are subject to a special statutory management regime. In some locations the oil is stored and analysed in order to identify possibilities for re-use.

The collection of the waste oil must be carried out selectively, according to law, in sealed containers which are resistant to mechanical and thermal shock and are clearly marked with the name "Used oils". All measures must be taken to prevent sewage leakage during handling, storage and use. The storage in containers of spent oil must be in well-ventilated and dry locations, sheltered from heat sources, flame, sparks or other sources of fire, and appropriate measures of fire prevention must have been taken.

Main materials present in waste:

- Extraction and drilling waste: Drilling mud (containing fresh water, chlorides, barite, bentonite, polymers, etc.).
- Waste from production:
  - Petroleum waste (containing waste oils and fuels used for equipment);
  - Waste from used pipes, equipment and machinery (containing metals and alloys);
  - Plastic waste (containing plastics).
- Natural gas processing waste:
  - Waste from natural gas drying of triethylene glycol and silica gel (containing non-hazardous substances);
  - Filter and separator waste for impurities from natural gas/hydrocarbon separators (containing textiles, waste oils, sludge, etc.);
- Transport and maintenance waste:
  - Scrap metal and spare parts (containing metals);
  - Waste industrial oils (containing oils/lubricants);
  - Plastic and rubber waste (plastic, polymers).
- General operational waste:
  - Packaging waste (containing metal, plastic, paper, paperboard, glass);
  - Electrical and electronic waste (WEEE) (contains metal, plastic, freon, glass, etc.);
  - Hazardous waste (containing hazardous chemical substances and mixtures).

## Depogaz

Depogaz generates a variety of specific waste from its gas storage activities. Waste streams include:

- Scrap metal: This waste results from scrapping operations of fixed assets which can no longer be used in the gas storage process, due to technical wear and tear and obsolescence,

and the repair costs of which are very high, i.e. through cutting operations in mechanical workshops. The categories of waste in this stream are: iron and steel, ferrous, copper, aluminium, alloys. Scrap metal is collected and recovered on the basis of contracts concluded with authorized economic operators.

- Electrical and electronic equipment and waste (EEEW): This consists of end-of-life products and includes a whole range of electrical and electronic items, such as: IT and telecommunications equipment, electrical and electronic tools, monitoring and control tools, etc. These are collected and handed over to authorized economic operators.
- TEG Waste. Similar with Romgaz, for the controlled disposal of TEG waste, Depogaz has concluded a contract with an authorized economic operator.
- Waste from non-chlorinated mineral engine oils, transmission and lubrication (used oil): Used oil is generated in the gas compression process in compressor stations. It is stored in special containers and recycled through an authorized economic operator with which DEPOGAZ has concluded a contract.
- General waste from other activities: This includes plastics, paper and cardboard, absorbers, filter materials (including oil filters without other specification), polishing materials, protective clothing contaminated with hazardous substances and packaging containing residues or contaminated with hazardous substances. These are collected and handed over to authorized economic operators.

Waste generated through the activities of Depogaz is managed in accordance with current regulations and through the implementation of management processes and measures to minimize its environmental impact.

#### RBS

RBS generates general office waste: this includes plastic, paper and cardboard packaging, metal, glass, toners and electrical waste. For each type of waste, RBS implements management processes and measures to minimize the environmental impact, including codification and disposal through authorized firms, economic treatment and recovery.

#### Total amount of hazardous and radioactive waste generated (tonnes)

Type of waste	Romgaz	Depogaz	RBS	ROMGAZ Group
Hazardous waste generated [t/]	468.17	24.18	0	492,34
Radioactive waste [t]	0	0	0	0

Note: on 31 December 2024, Romgaz still had 70.58 t of hazardous waste in stock.

#### 6.3.4 E5-6: Anticipated financial effects of from resource use and circular economy-related impacts, risks and opportunities

According to the provisions of Appendix C of ESRS 1, ROMGAZ is using the transition period to report information on the anticipated financial effects of material risks and opportunities regarding resource use and circular economy.

Any further details will be included in the subsequent reports, once a methodology dedicated to this subject is also adopted.



## 7 ESRS S1 - Own workforce

### 7.1 Strategy

#### 7.1.1 ESRS 2 SBM-2: Interests and views of stakeholders

One of ROMGAZ Group's strategic objectives for the 2021-2030 period is to establish long-term and equally profitable relationships with the market and the social environment. This objective includes, among others, the development of human resources to adapt to future trends in sustainable energy.

With a workforce of 5,977 employees as of December 31, 2024, the company's personnel represent a key group among the stakeholders affected by ROMGAZ Group's activities.

Employees' rights, interests, and views, as well as their adherence to human rights principles, are ensured by the company's policies, and employees can directly contribute to the business model and operational structure of the ROMGAZ Group. The process of evaluating the business model and operational structure is dynamic and interactive, integrating employee feedback through annual survey results, internal communication channels, and continuous dialogue.

Employee access to top management is facilitated through the hearing program. Additionally, the company employs various information and communication tools, such as electronic channels ([secretariat@romgaz.ro](mailto:secretariat@romgaz.ro), [comunicare@romgaz.ro](mailto:comunicare@romgaz.ro)), an internal radio accessible to all employees via a link, notice boards, and an internal intranet network - Infoweb.

The Company's business model and operational structure may be influenced by its own workforce through the annual employee and trade union consultation, as well as collective bargaining processes. ROMGAZ Group respects the interests, perspectives, and rights of its employees, encouraging continuous dialogue, implementing flexible work arrangements and long-term employment contracts, enforcing occupational health and safety policies, and investing in training and professional development programs. These initiatives intend to address employees' needs and interests while ensuring their protection against negative labour-related impacts.

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

As part of the double materiality assessment process, the impacts, risks, and opportunities associated with each material topic and subtopic related to workforce were evaluated in accordance with AR 16 of ESRS 1.

The current and potential workforce-related impacts and risks are closely linked to the company's strategy and business model. ROMGAZ Group's actions are directed towards minimizing negative impacts, reducing risks, and creating opportunities for the development of all employees.

In the context of the energy transition, the ROMGAZ Group aims to gradually adopt a new portfolio of activities. This shift may impact the company's workforce, requiring the reskilling and upskilling of employees to align with new requirements. In this regard, the company incorporates the development and integration of competencies in emerging fields such as carbon capture and storage (CCS) and renewable energy production into its training programs, while simultaneously leveraging existing expertise.

In the context of labor contract adjustments due to business structure developments, organizational changes, or security requirements, the company evaluates alternatives and promotes constructive dialogue with employees to identify professional reconversion solutions, where and if applicable. Throughout 2024, no restructuring or collective layoffs have taken place among the company's employees.

The ROMGAZ Group's strategy includes the implementation of digital solutions and automation across all business segments. This strategy creates new professional positions and attracts new talent while offering existing employees diverse opportunities for professional development, including skill updates and reskilling. The company invests annually in education, collaborating

with vocational and technical education institutions and specialized universities in the country to help develop a workforce aligned with its strategic objectives.

The personnel strategy and operational model of ROMGAZ Group are designed to:

- Ensure workforce stability by offering long-term employment contracts and competitive salaries;
- Retain talent and enhance competencies through the implementation of professional training programs and by providing a non-discriminatory and violence-free work environment.

These concerns may have a positive impact on the company, but their absence or the improper implementation of existing policies may have an adverse effect—since the workforce is the driving force behind the company’s development strategy.

Due to the nature of its industry, workplace health and safety are central elements of the business model. Therefore, ROMGAZ Group leverages its own health treatment facilities to provide employees with solutions to address health issues.

The risks and opportunities arising from the impacts and dependencies on its workforce influence ROMGAZ Group’s strategy by strengthening employee retention and development policies. For example, opportunities such as developing industry-specific skills, attracting young talent, and implementing fair policies contribute to adapting ROMGAZ Group’s business model, ensuring long-term sustainability.

The topics identified as material, related to the company’s own workforce, include:

## IROs related to their own workforce

### Legend:

Type of impact: F = financial impact, M = material impact, MF - material and financial impact

Time Horizon: A = current impact, P = potential impact

Source of impact: S = impact arising from strategy and business model, B = impact that underpins strategy

Material sub-topic and Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Working conditions <b>Secure employment</b>	Own activity/ value chain	M	B			P	The absence of policies to protect workers from income fluctuations due to the type of employment contract can negatively impact employees' psychological well-being, leading to productivity and loyalty related consequences, both within the company's own operations and across the value chain.	-	
Working conditions <b>Adequate wages</b>	Upstream, Own Activity	MF	B	A	ROMGAZ Group values the loyalty and experience of its employees, recognizing their contribution to the company's and industry's development. Through additional benefits and retirement support, correlated with seniority in the natural	P	In some cases, wages may not fully reflect the complexity and risks associated with the work of the gas industry. This can lead to employee dissatisfaction, impacting morale	-	

Material sub-topic and Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
					gas and/or electricity industry, the company ensures a smoother transition to this stage, reflecting its commitment to employee well-being.		and productivity. Additionally, salary differences between various positions and operational locations may create tensions and inequities within the company.		
Working conditions <b>Health and safety</b>	Upstream, Own Activity	MF	S	A	ROMGAZ Group ensures a safe and healthy work environment through a health and safety management system audited both internally and externally, which mitigates risks and protects employees' health. Continuous monitoring and the company's support for medical treatments contribute to the prevention of occupational diseases.	A, P	Limited access to medical services in remote operational locations and exposure to toxic chemicals and pollutants can lead to chronic illnesses and health issues (including mental health problems). Due to the nature of the work, occupational diseases may arise, caused by factors such as exposure to noise, vibrations, harmful chemicals, etc. The complex work program can cause extreme fatigue	-	Improving working conditions, prevention programs and investing in own treatment facilities contribute to increasing employee satisfaction, reducing personnel fluctuations, maintaining employees' health and strengthening ROMGAZ Group's reputation as a responsible employer.

Material sub-topic and Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
							and increased health risks. Any work accident can create an unattractive working environment. Reputational risks with financial implications may arise.		
Equal treatment and opportunities for all  Gender equality and equal pay for work of equal value	Own Activity	MF	B	A	ROMGAZ Group promotes a fair and inclusive work environment, ensuring non-discriminatory access to employment and professional development. The company's policies support pay equity and merit-based advancement, contributing to the reduction of gender disparities.  The distribution of women in specific positions results in a favorable average salary ratio for them, reflecting ROMGAZ Group's commitment to diversity and organizational sustainability.	P	Inequalities can lead to a lack of motivation and a sense of injustice among employees, thus affecting the cohesion and efficiency of the team.	-	
Equal treatment and opportunities for all	Own Activity	MF	B	A	The continuous investment in employees' professional development	A	Inadequate or insufficient training can lead to stress,	-	The development of industry-specific skills contributes to increasing the expertise of employees, thus providing a

Material sub-topic and Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Training and skills development					<p>enhances their skills and job satisfaction.</p> <p>Through the Romgaz NextGen internship program and practical training opportunities for students, Romgaz contributes to developing a future generation of specialists while strengthening its position as an attractive employer.</p>		<p>fatigue, errors and accidents within the organization.</p> <p>The transition to a climate-neutral economy may require training and retraining of the workforce.</p> <p>The lack of qualified ROMGAZ staff may have a negative impact such as the delay in development projects.</p>		<p>well-trained workforce capable of meeting the specific technical and safety requirements of the energy sector.</p> <p>The implementation of effective training and development policies reinforces ROMGAZ's reputation as a responsible employer, attracting and retaining the talents necessary for the long-term competitiveness of the company.</p>
<p>Equal treatment and opportunities for all</p> <p>Measures against violence and harassment in the workplace</p>	Own Activity	MF	B	A	<p>ROMGAZ Group promotes a work environment based on respect, integrity, and equality, maintaining a zero-tolerance policy towards any form of harassment.</p> <p>Through clear internal reporting and investigation mechanisms, the Group creates a harassment-free environment, ensuring the protection of employees and collaborators, and fostering the improvement of working conditions.</p> <p>No confirmed incidents have been recorded in recent years.</p>	P	<p>Harassment at the workplace may have a negative impact on the people involved and on organizational culture, with effect on the productivity and loyalty of employees</p>	-	

ROMGAZ Group's workforce is composed of 99.85% permanent employees—workers with full-time or part-time indefinite-term employment contracts—while the remaining employees are on fixed-term individual employment contracts.

ROMGAZ Group has seven administrators and three directors who work for the company under mandate contracts. The Deputy General Director holds two contracts—one as an administrator and one as a director.

For certain specialized projects or operations, ROMGAZ Group works with subcontractors who may be present at the company's locations for varying durations depending on the projects they are working on. These subcontractors must adhere to the workforce-related provisions outlined in the service contracts concluded with ROMGAZ Group.

Regarding material impacts, as well as the risks and opportunities associated with the workforce, the company's policies and programs comprehensively cover all workforce members. Depending on the location of activity (operational locations or offices), workforce-related risks and opportunities may vary, and this is reflected in the job descriptions and risk analysis.

According to the double materiality assessment, it was noted that negative impacts may occur among the company's own employees:

- In the absence of employment policies providing for stable employment contracts and salaries that ensure a decent standard of living;
- Due to the work conditions specific to the industry. The company's activities expose employees to occupational diseases caused by exposure to noise, vibrations, and harmful chemicals. Insufficient access to healthcare services in remote operational areas and exposure to dangerous chemicals and pollutants may lead to chronic or acute conditions, including mental health issues. Additionally, a demanding work schedule in an industry with strict safety requirements can cause burnout and significantly increase health risks or the likelihood of accidents. Workplace accidents have the potential to create an unfavorable work environment, generating risks to the company's reputation, which in turn can have financial implications;
- The lack of a fair compensation policy may lead to employee demotivation;
- Due to a lack of specific professional training related to the demanding or changing working conditions in the industry for the company's staff;
- Or in cases where the organizational culture does not address workplace harassment.

ROMGAZ Group generates significant positive impacts on its own workforce by implementing the following initiatives and activities targeting all employees:

- **Safe jobs.** The company focuses on the quality of the workforce and the level of professional training, with almost all employees (99.85%) having full-time, indefinite-term contracts.
- **Adequate salaries.** At ROMGAZ Group, in addition to fixed compensation that complies with applicable regulations, employees' loyalty and experience are valued through an additional benefits package.
- **Training and development.** ROMGAZ Group supports the professional training and development of employees to enhance their competence at work. The company also ensures the (re)authorization/(re)certification necessary for employees to perform their professions.
- **Internal coaching.** In 2024, the internal coaching program was implemented as part of the company's commitment to supporting the professional and personal development of employees. Seventeen individuals enrolled in this initiative.
- **Gender equality and equal pay for equal work.** The company's practices facilitate non-discriminatory access to jobs and career development. At ROMGAZ Group, the pay ratio is favourable to women at certain hierarchical levels, reflecting a fair distribution across roles.
- **Measures against violence and harassment.** ROMGAZ Group applies a zero-tolerance policy towards any form of harassment, regardless of the individuals involved, both

within and outside the company, including at social events, business trips, training sessions, or conferences. The company has created tools for internal reporting and investigating such incidents.

The opportunities for the company and its employees result from the policies and facilities that ROMGAZ Group provides to its workforce.

ROMGAZ Group does not have any operations involving forced labor or child labor risks. For its value chain, there are contractual clauses prohibiting the companies ROMGAZ Group collaborates with from using child labor or forced labor, although ROMGAZ Group has not conducted verification or auditing processes in this regard.

Due to the nature of its activities, ROMGAZ Group has jobs that carry a higher risk of occupational diseases. Workers in compressor stations, production test teams, and those involved in major repairs at wells are exposed to greater risks of developing occupational diseases, especially those associated with the loud noise in which these activities take place. Employees in these positions are informed about these risks upon hiring and periodically (according to legal regulations, with frequencies set based on the annual training-testing schedule—monthly, quarterly, semi-annually, or annually) through training on workplace health and safety.

ROMGAZ Group	2024
Number of employees involved in activities posing a high risk of developing occupational diseases	313*
Number of deaths from occupational diseases	0
Number of registered occupational diseases	0

\*288 employees are employed under special working conditions, and 25 employees work under exceptional working conditions. (Romgaz)

- 0 employees are employed under special working conditions, and 0 employees work under exceptional working conditions (Depogaz).

\* 0 employees are employed under special working conditions (RBS).

## 7.2 Impact, risk and opportunity management

### 7.2.1 S1-1: Policies related to own workforce

ROMGAZ Group operates in accordance with the applicable labor legislation in Romania and has internal codes and policies that ensure the respect of employees' rights, addressing the impacts, risks, and opportunities identified through the double materiality assessment.

[ROMGAZ Group's human resources policy](#), aligned with the company's general objectives, focuses on harnessing the potential of the existing workforce and identifying external resources to improve specialization and professional training. The main directions of this policy include:

- Increasing the level of professional competence, with a focus on employees;
- Achieving a balanced distribution of human resources both at the company's headquarters and in the branches, based on the specific nature and importance of the activities carried out;
- Establishing its own personnel promotion system for high-performance potential, prioritizing internal selection;
- Strengthening its organizational culture and the sense of belonging.

The human resources policy intends to organize, recruit, select, assess performance, and develop personnel in line with business objectives.

ROMGAZ Group takes into account fundamental human rights in its activities, in line with international regulations, national laws, and [internal social responsibility](#) standards (Social Responsibility Policy).

When developing policies that govern the company's operations, ROMGAZ Group complies to nationally and internationally recognized standards concerning employees' rights (UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines for Multinational Enterprises) and encourages employee



involvement in the company's sustainability management by consulting them during the double materiality assessment process.

The policies apply to the company's own operations and value chain (according to contractual provisions), and the responsibility for approving and overseeing their implementation rests with the General Director.

[The Code of Ethics and Conduct of Business](#) promotes ethical responsibility in fulfilling obligations, implementing ROMGAZ Group strategy and achieving operational and economic objectives, one of the objectives being to create inclusive, safe and ethical jobs.

This is available both in English and Romanian on the company's website and details the procedures for reporting any situations that may negatively affect the company's workforce to the Ethics Advisors.

External stakeholders can also submit complaints to ROMGAZ Group if they observe any potential violations of human rights or ethical standards related to the company.

Annually, a report from the Ethics Advisors is prepared and presented to the management regarding the monitoring of the application and compliance with the principles and standards of ethics and integrity within ROMGAZ Group. This report includes aspects related to possible violations of the conduct standards set out in the Ethics and Integrity Code, the Internal Regulations, and the Collective Labor Agreement.

ROMGAZ Group's Human Rights Statement was developed during 2024 and approved on January 23, 2025. The statement covers all necessary requirements and explicitly addresses the fight against forced labor, human exploitation, human trafficking, and child exploitation, in compliance with legal provisions regarding the minimum age for employment.

Specifically, the following policies apply to identified material topics:

#### **1. Secure employment**

ROMGAZ complies with the Labor Code and related national legislation regarding employment, practices and the types of contracts offered. Therefore, the company offers individual employment contracts for indefinite periods, either full-time or part-time, in accordance with ROMGAZ's Human Resources Policy, which ensures a stable income for employees.

The operational procedure "Recruitment and Selection of Personnel" regulates the activity to ensure human resources in accordance with the requirements and complexity of their positions, as well as the coherent and efficient allocation of internal human resources. The document includes principles of transparency, non-discrimination, and equal opportunity for all candidates, as well as the improvement of employee performance.

At ROMGAZ level, starting from June 1, 2024, a Collective Labor Agreement negotiated with the "Free Trade Union within S.N.G.N. Romgaz S.A." is in effect, valid until June 1, 2026, and is applicable to all employees.

At Depogaz Subsidiary level, starting from June 1, 2024, a Collective Labor Agreement negotiated with "Depogaz Ploiești Storage Branch Union" is in effect, valid until May 31, 2026, and is applicable to all employees.

Currently, there is no Collective Labor Agreement at RBS Subsidiary level, but the legislation stipulates that the negotiation process must begin once the number of employees reaches 10.

## 2. Adequate wages

At ROMGAZ Group, there is a [Remuneration Policy](#) applicable to administrators and directors. This policy sets their fixed and variable remuneration thresholds.

For the rest of the employees, the Collective Labor Agreement is negotiated every two years, ensuring that adequate salaries are provided, reflecting the work and qualifications of employees, while ensuring that the minimum remuneration complies with legal standards.

Additionally, the Company offers various supplementary benefits, including private pension schemes, health insurance, reimbursement of tourism services, material aid for special situations, professional training programs, and retirement benefits.

## 3. Health and Safety

ROMGAZ has implemented an Occupational Health and Safety Management System in accordance with the ISO 45001: 2023 standard, ensuring compliance with the applicable legislation. The management system covers all company employees.

The section "Working Conditions - Occupational Health and Safety" in the Collective Labor Agreement includes the employer's and employees' obligations, working conditions and standards, staff training, and health protection. The Occupational Medicine Office promotes a healthy lifestyle through recommendations and best practices addressed to employees.

According to [the Social Responsibility Policy](#), the commitments made to achieve the occupational health and safety objectives mentioned in section S1-5 include:

- Developing specific plans for Emergency Situations (Fire Prevention and Civil Protection), aimed at preventing events with severe consequences.
- Enhancing occupational health and safety management and implementing best practices to eliminate workplace accidents;
- Beyond its obligations related to other voluntarily adopted requirements, ROMGAZ Group promotes continuous improvement in working conditions and the management of security, health, and employee well-being;
- Preventing and avoiding employee accidents and health issues by ensuring a safe and healthy environment;
- Continuously monitoring the responsibility to report, assess, and appropriately manage any potential risk situations that could affect workers and equipment safety;
- Ensuring compliance with all applicable legal requirements in the field through the integrated management system for quality, environment, and occupational health and safety, in accordance with the ISO 9001:2015, ISO 14001:2015, and ISO 45001:2023 standards;
- Promoting measures to improve employees' occupational health and safety by establishing principles regarding professional risk prevention, health protection, and worker security, eliminating risk factors and accidents, informing, consulting, and ensuring balanced participation according to the law, and training workers and their representatives in line with applicable legislation;

ROMGAZ Group also complies with the requirements of SEVESO by implementing operational security measures and [public reporting](#) of security measures and accident behavior.

The ROMGAZ Group infrastructure management system involves the implementation and application of specific procedures aimed at ensuring the effective maintenance of the natural gas infrastructure for accident prevention purposes. These procedures are detailed and classified based on the type of maintenance and specific activity, as follows:

- Preventive maintenance in natural gas compression activities.
- Corrective maintenance in natural gas compression activities.
- Preventive maintenance in natural gas dehydration activities.
- Corrective maintenance in natural gas dehydration activities.
- Corrective maintenance to address accidental defects in natural gas pipelines.

- Corrective maintenance to remedy accidental defects in surface technology installations.
- Rectification insulation defects on collector pipelines.

Accidents at work and risks are monitored and managed according to legislation, and investigation of incidents is aimed at preventing future events. Accidents at work are registered in the Single Register of Records for fair and transparent reporting.

The Society also identified jobs with high risk of occupational diseases, providing specific measures to reduce exposure to risk factors such as intense noise (information presented at page 126).

#### **4. Gender equality**

At ROMGAZ Group, there are provisions and responsibilities regarding diversity, equal opportunities, and non-discrimination of any kind, both within the Collective Labor Agreement, as well as the Internal Regulations and the Code of Ethics and Integrity.

Through the Code, ROMGAZ Group intends to ensure a working environment for its employees where their skills, talents, experience, and contributions to the company's performance are appreciated and respected, and encourages the cultivation of an atmosphere based on trust, openness, mutual respect, and sincerity by all staff members.

#### **5. Training and skills development**

ROMGAZ Group shall ensure that employees receive continuous training in areas relevant to their roles within the organization. This training aims at acquiring and developing new knowledge and skills, but also at ensuring (re)authorization/(re)certification necessary for employees to carry out their work.

To regulate employees' needs for training and professional development, the company has implemented a procedure to identify training and professional development needs, as well as the means and manner to implement them.

The training and professional development of ROMGAZ Group's employees shall be carried out through their participation in internal and external programs, in accordance with the Training and Professional Development Plan.

Additionally, the company has a procedure for evaluating the professional performance of its employees. This procedure serves both to measure performance and to support the continuous development of employees and improve the way work is carried out at the organizational level.

Performance evaluations are conducted annually, based on criteria adapted to different employee categories. The process is designed to recognize employees' skills and performance, increase self-confidence, encourage development, identify employee potential, and promote a corporate culture focused on continuous development.

#### **6. Measures against harassment and violence**

[The Code of Conduct for Business](#) covers issues such as: human rights, loyalty/corporate integrity, competition and anti-trust law, anti-corruption and anti-fraud, responsibility in relation to third parties, sustainability and relations with the environment and community.

The Code also includes the modalities for the referral and reporting of possible harassment or violence at work to the ethics adviser.

### **7.2.2 S1-2: Processes for engaging with own workers and workers' representatives about impact**

Collaboration with the workforce is carried out directly through annual satisfaction surveys addressed to all employees. The General Director and the Human Resources Director are responsible for overseeing and implementing this collaboration process.

To identify the impacts, risks, and sustainability opportunities related to the workforce, ROMGAZ Group employees have been involved in the double materiality assessment (the complete description of the consultation process can be found on page 27).

There are also specific collaboration channels in place.

For example, to manage the negative impact related to occupational health and safety, at the level of the Company and of each subsidiary, there is a Health and Safety Committee (except for the Drobeta Turnu Severin Subsidiary, as according to the legislation, the establishment of a HSC is mandatory only for units with at least 50 employees). In this context, for the respective subsidiary, the responsibilities regarding occupational health and safety for the 2 employees are directly managed by the Prevention and Protection Service within the Company's Headquarters.

These committees operate based on their own Organization and Functioning Regulation and meet quarterly or whenever necessary to address occupational health and safety issues. The minutes of the meetings are communicated to all employees. The committees consist equally of both employee representatives and management representatives.

The company's management consults with the trade unions for the negotiation of collective labor agreements or for managing possible labor conflicts.

### **7.2.3 S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns**

According to the [Code of Ethics and Conduct in Business](#), ROMGAZ employees have multiple channels to express their opinions or signal possible violations of any internal policies or regulations. The communication channels are presented in detail in the ESRS 2 section, page 24.

Ethics advisers shall consider referrals and complaints about violations of professional conduct, ethics and integrity by the management and personnel of ROMGAZ Group and make general recommendations to the General Director.

Thus, the ethics advisers prepare semi-annual analyses and reports on the issues reported to the General Director. The reports and analyses are approved by the General Director and forwarded for information to the Monitoring and Coordination Commission for the Implementation and Development of the Internal Managerial Control System and to the Audit Committee. The ethics advisers address all situations reported to them in an independent and objective manner and handle all information brought to their attention with maximum discretion, confidentiality, and non-discrimination.

In 2024, 32 complaints were registered in the Reporting Record, managed by the Ethics Advisors.

Also, to facilitate better and direct communication, all employees have communication tools provided by the Company and can access management teams through the hearing program.

ROMGAZ Group evaluates the reporting mechanisms annually, considering relevant legislative changes and integrating detailed employee feedback to ensure the company's system is updated in accordance with the needs of the organization and all personnel.

The management of the organization is interested in collecting real data regarding employee satisfaction at the workplace and aims to encourage them in:

- Open communication, without fear of retaliation, regarding any issues they face during working hours;
- Suggesting improvements to enhance performance and develop partnership relationships.

Employee satisfaction evaluation is carried out according to the procedure "Employee Satisfaction Evaluation," which describes how feedback regarding the employees' satisfaction level within the company is obtained. The results help ROMGAZ identify the strengths and

weaknesses of the work environment, implement improvements, and maintain a favourable climate, thus contributing to the growth of trust and employee loyalty.

Potential breaches of conduct norms by directors or administrators are analyzed in the context of the provisions of the mandates and administration contracts by the Audit Committee.

ROMGAZ Group also regulates the way in which complaints received from external sources are managed. There are three contact points for registering complaints from the general public: [consilierdeetica@romgaz.ro](mailto:consilierdeetica@romgaz.ro), [comunicare@romgaz.ro](mailto:comunicare@romgaz.ro) and [petitii@romgaz.ro](mailto:petitii@romgaz.ro).

For the underground gas storage service, there is a dedicated phone number, TELVERDE 0800833764 (08008DEPOG).

Regarding RBS, there is no special communication line dedicated yet.

Complaints can be registered online on Company's external website by accessing the link [www.romgaz.ro](http://www.romgaz.ro).

To evaluate how well the members of the workforce are familiar with these mechanisms, additional information has been included in ESR5 G1 section.

#### **7.2.4 S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions**

ROMGAZ Group implements various measures to address the impacts on the workforce, which are presented below. The effectiveness of these measures, as well as the verification that the company's practices do not produce or contribute to significant negative impacts on the workforce, are monitored through the annual employee feedback surveys.

In the context where employment contracts are adjusted due to developments in business structure, organizational changes, or security requirements, the company evaluates alternatives and promotes a constructive dialogue with employees to find professional retraining solutions where applicable. Throughout 2024, no restructurings/collective layoffs have occurred among the company's employees.

- **Secure employment**

To provide secure jobs, ROMGAZ Group signs indefinite-term employment contracts with full social coverage. Thus, employees are protected from potential income fluctuations caused by job loss. Employees are covered by both state and private social insurance. In case of layoffs, they are entitled to unemployment benefits, according to national legislation.

Throughout 2024, ROMGAZ Group developed a procedure for regulating voluntary departures.

The effectiveness of these initiatives is evaluated through the annual consultation with employees.

- **Adequate wages**

The employment contracts include provisions regarding the alignment of salaries with the national inflation rate, with annual updates. Throughout 2024, based on the negotiation minutes signed on July 23, 2024, it was established that, starting from August 1, 2024, the gross base salaries of employees within SNGN Romgaz SA will increase by 5.71% and by a fixed amount of 150 RON gross/employee. Additionally, the salary scale applied within SNGN Romgaz SA was reshaped by increasing the values of the 1st salary classes at each level by 5.71% and a fixed amount of 150 RON, taking into account the classification coefficients established in Annex 8 of the Collective Labor Agreement for the years 2024 - 2026, registered with the Territorial Labor Inspectorate under No. 9177/27.05.2024.

- **Health and safety**

By implementing an integrated management system, the Company identifies and manages the risks associated with its activities, promoting an organizational culture focused on accident prevention.

Throughout 2024, the following specific actions were carried out:

- Auditing and recertification of the management system according to ISO 45001:2023;
- Adequate training to raise awareness of the importance of work safety;
- Ensuring appropriate protective equipment for each category of employees;
- Ensuring access to private medical services;
- Emergency response drills for SEVESO locations.

- **Gender equality and equal pay for work of equal value**

Through the policies adopted, ROMGAZ Group does not discriminate on the basis of gender and does not exclude diversity and inclusion in the workplace. In its industry, the gender pay gap is influenced by the specific nature of jobs. For example, in the category of 'Workers', high-risk jobs are predominantly occupied by men, which entails higher wage increases.

However, in ROMGAZ Group, the ratio between men's and women's wages varies according to the hierarchical level. While there is a male-friendly report in the Workers category, this changes in the Middle and Top management positions, where women's salaries are on average higher than men's. Generally, the overall ratio of women's and men's average wages in the company is highly favourable to women, an issue which is significantly influenced by the distribution of employees per roles.

Through the implementation of equitable remuneration policies and regular analyzes, ROMGAZ Group continues to monitor these issues in order to ensure transparency and the application of the principles of equality. In addition, the Society develops initiatives to encourage balanced participation of women and men in all classes of functions, thus promoting diversity at organizational level.

- **Training and skills development**

ROMGAZ Group supports the continued development of its employees by ensuring that they constantly improve their skills relevant to their roles within the organization. The company also provides (re)authorization/(re)certification necessary to carry out the professional activities as required by specific requirements.

In order to minimize the risks associated with employee fluctuation and insufficiency in skills development, ROMGAZ Group applies measures that ensure operational continuity, including: identifying and designating substitutes for key positions, facilitating access to training programs for employees to further develop relevant skills, organizing internal coaching sessions and regular performance evaluation, in order to identify emerging needs for professional development.

The Group also intends to develop a formal succession policy for key and critical positions, ensuring long-term business continuity.

In the context of energy transition, ROMGAZ Group aims for the gradual adoption of a new portfolio of activities. This change may have an impact on its workforce, involving the need for reskilling and upskilling of employees to align with new requirements. In this regard, the Company includes the development and integration of competencies in emerging fields such as carbon capture and storage (CCS) and renewable energy production in its training programs, while simultaneously leveraging existing expertise.

ROMGAZ Group's strategy includes the implementation of digital solutions and automation across all activity segments. This strategy generates new professional positions and attracts new talents, offering to existing employees diverse opportunities for professional development, including the updating and reskilling of competencies.

The company invests annually in education, collaborating with vocational and technical education institutions and universities in the country, in order to contribute to the formation of a workforce adapted to its strategic objectives.

- **Assessment of employee performance**

ROMGAZ Group has implemented an employee performance evaluation procedure aimed at recognizing employees' skills and performance, increasing and strengthening the employee's self-confidence, encouraging employee development, enhancing motivation and satisfaction with their activities, identifying the potential of the employee, promoting a culture oriented toward continuous development that encourages collaboration and active involvement.

Performance evaluation is conducted annually, based on clear and transparent criteria, adapted to different categories of staff.

- **Measures against violence and harassment at work**

ROMGAZ Group has a zero-tolerance policy towards any form of harassment, whether sexual or moral, as well as any acts of violence within the organization.

This policy is supported by preventive measures, such as periodic training for employees, awareness sessions regarding ethical behavior, and the promotion of a respectful working environment. During the reporting period, ROMGAZ Group conducted 3 informational campaigns aimed at disseminating the information developed in the "Policy on Combating Harassment and Discrimination in the Workplace" and in the "Internal Regulation."

ROMGAZ Group has also implemented a [Privacy Policy on the protection of personal data](#). It ensures compliance with European data protection legislation (GDPR), protecting the personal information of employees and/or practicing/trainees, candidates for ROMGAZ Group's job vacancies and visitors to the website [www.romgaz.ro](http://www.romgaz.ro).

## 7.3 Metrics and targets

### 7.3.1 S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

- **Secure employment**

During 2024, the Company had no targets on this material topic.

- **Adequate wages**

During 2024, the Company updated employees' wages in accordance with internal procedures and the Collective Labor Agreement negotiated with trade unions. There were no other targets on this material topic.

- **Health and safety**

In order to reduce the negative impacts on the workforce and to increase employee satisfaction and well-being, by 2030, the ROMGAZ Group has set objectives and performance indicators related to the health and work of employees as follows:

- Zero fatal accidents arising from work-related accidents;
- Reduction in number of incidents/accidents with lost working time (LTIR < 0,4);
- Implementation of process safety monitoring and reporting.

- **Gender equality and equal pay for work of equal value**

During 2024, the Company had no targets on this material topic.

- **Training and skills development**

Professional training is a component of ROMGAZ Group's Management Plan.



The objectives set in relation to training and the development of competencies are for 2024 were:

- The average number of professional training hours per employee per year was at least 8 hours in 2024;
- All eligible employees are included in the annual performance evaluation process. The completion of the evaluation process for 2024 takes place at the end of the first quarter of 2025, so the data included in this report is for the year 2023;
- 100% of employees trained in occupational health and safety (OHS) according to ISO management system requirements;
- ROMGAZ Group aims at finalizing the succession policy by December 31, 2025.

The procedure for employee training and professional development stipulates that the identification of training and professional development needs is done with the involvement/consultation of the employee.

Targets on training and performance evaluation cover all ROMGAZ Group employees, while the succession policy will define key leadership roles and critical functions for the Society.

- **Measures against violence and harassment at work**

During 2024, the company had no targets on this material topic.

### 7.3.2 S1-6: Characteristics of the undertaking's employees

During 2024, all ROMGAZ Group employees worked in Romania. Therefore, the country breakdown requested in paragraph 50(a) is not applicable.

The information given in this Section is not validated by an outside body other than the assurance provider.

#### Total number of employees, expressed as number of persons or full-time equivalents of permanent employees, with breakdowns by gender; temporary employees, and breakdown by gender and non-guaranteed hours employees, and breakdown by gender

ROMGAZ Group		2024
Number of permanent employees (head count / FTE)	Women	923
	Men	5 040
	<b>TOTAL</b>	<b>5,963</b>
Number of temporary employees (head count / FTE)	Women	4
	Men	10
	<b>TOTAL</b>	<b>14</b>
Number of non-guaranteed hours employees (head count / FTE)	Women	0
	Men	0
	<b>TOTAL</b>	<b>0</b>
Number of employees (head count / FTE)	Women	927
	Men	5,050
	<b>TOTAL</b>	<b>5,977</b>

Note 1: Information on the number of employees that are on the payroll of ROMGAZ on 31.12.2024 can be found in the 2024 Consolidated Administrators' Report.

Note 2: According to the legislation in force, gender-based division can only be made between men and women, with no formal recognition of other categories.



## Information about the employees who left the company and rotation rate

Indicator		2024
ROMGAZ Group	Total number of employees who voluntarily left the company during the reporting period	30
	Total number of employees who left the company unintentionally in the reporting period	232
	Average number of employees	5,978
	Voluntary personnel fluctuation rate (%)	0.50
	Rate of involuntary personnel fluctuation (%)	3.88
	Employee turnover rate (%)	4.38

The number of employees was used on 31 December 2024 for the submission of data.

### 7.3.3 S1-7: Characteristics of non-employee workers in the undertaking's own workforce

The information given in this Section is not validated by an outside body other than the insurance provider. Non-salaried workers are individuals employed under mandate contracts, as described in ESRS 2 Section at page 8. As of December 31, 2024, ROMGAZ Group had 17 non-salaried workers; the breakdown of these workers by subsidiaries is presented below.

**Information regarding non-salaried workers, as the number of mandate contracts as of December 31, 2024.**

ROMGAZ Group		2024
Number of self-employed persons	Women	0
	Men	0
	<b>TOTAL</b>	<b>0</b>
Number of persons provided by enterprises principally engaged in employment activities	Women	0
	Men	0
	<b>TOTAL</b>	<b>0</b>
Number of unpaid workers (number)	Women	6
	Men	10
	<b>TOTAL</b>	<b>17</b>

### 7.3.4 S1-10: Adequate wages

ROMGAZ Group provides a level of remuneration for all its employees at least equal to or higher than the national minimum wage set by the applicable legislation in Romania.

The information given in this Section is not validated by an outside body other than the insurance provider.

### 7.3.5 S1-11: Social protection

The social protection of employees is addressed by ROMGAZ Group through social contributions which are in conformity with national law. All employees therefore benefit, under the conditions of the law applicable in Romania, from:

- Paid sick leave,
- Unemployment,
- Parental leave for children care,
- Pension benefits.

In addition to the monthly salary and the benefits mentioned above, employees benefit from a set of advantages established by the Collective Labor Agreement, as follows:

- Coverage in case of disability or invalidity resulting from work accidents;
- Reimbursement of vacation packages;
- Provision of material assistance in the event of special life events of the employee;
- Contributions made on behalf of employees to voluntary pension schemes, within a limit of an amount equivalent to 400 euros per employee per fiscal year, in compliance with legal provisions;
- Payment of voluntary health insurance premiums, within a limit of an amount equivalent to 400 euros per employee per fiscal year;
- Coverage of (re)authorization costs for specialized personnel.

ROMGAZ Group rewards the loyalty of employees who have contributed to the company's development upon retirement. Regardless of the reason for retirement, each employee will receive assistance based on their length of service in the natural gas and/or electricity industry, as follows:

#### Number of salaries granted based on seniority

Seniority	Number of salaries awarded
5 to 10 years old	four monthly basic salaries at the time of retirement
10 to 20 years old	five monthly basic salaries at the time of retirement
20 to 30 years old	six monthly basic salaries at the time of retirement
30 to 40 years old	seven monthly basic salaries at the time of retirement
over 40 years old	eight monthly basic salaries at the time of retirement

The administrators and directors with mandates, in addition to the fixed monthly allowance established in the mandate contract, also received a variable allowance based on the degree of achievement of the performance indicators for the year 2023. For the year 2024, their remuneration is subject to the Annual Report on remuneration, benefits, and/or other advantages granted to the members of the Board of Directors and directors of ROMGAZ Group (full details are included in ESRS 2 Section - page 14).

#### 7.3.6 S1-13: Training and skills development metrics

The number and percentage of employees who participated in periodic performance and career development assessments in 2024:

Entity	Gender	The number of employees who participated in periodic performance evaluations	Percent	Eligible database
Romgaz	Female	779	97.86	796
	Male	4,513	99.87	4,519
	<b>TOTAL</b>	<b>5,292</b>	<b>99.57</b>	<b>5,315</b>
Depogaz	Female	93	98.94	94
	Male	390	99.24	393
	<b>TOTAL</b>	<b>483</b>	<b>99.18</b>	<b>487</b>
RBS	Female	7	100.00	7
	Male	5	100.00	5
	<b>TOTAL</b>	<b>12</b>	<b>100.00</b>	<b>12</b>
ROMGAZ Group	Female	879	97.99	897
	Male	4,908	99.82	4,917
	<b>TOTAL</b>	<b>5,787</b>	<b>99.54</b>	<b>5,814</b>

Note: The table with data at the branch level, considering that employee performance evaluations were conducted in different periods (April 30, 2024, for Romgaz and January 31, 2024, for Depogaz and RBS).

### The average number of training hours, by gender

Entity	Gender	Number of employees	The number of training hours	The average number of training hours
ROMGAZ Group	Female	927	9,003	9.71
	Male	5,050	57,343	11.36
	<b>TOTAL</b>	<b>5,977</b>	<b>66,346</b>	<b>11.10</b>

Note: In the calculation of the average number of training hours, broken down by gender, the training hours of the members of the Board of Directors of S.N.G.N. Romgaz S.A. were not included.

### Number of employees per category of employees in the reporting year

Indicator		2024
ROMGAZ Group	Higher management	55
	Mid-level management	347
	Other management positions	259
	Specialists with higher education	1,173
	Specialists without higher education	180
	Workers	3,963

### Number and percentage of employees involved in regular assessments of the performance and career development by employee category

The evaluation process for 2024 shall be completed after the publication of this report. Thus, the data presented cover the employee valuation for 2023.

	Category	Number	Percent	Eligible database
ROMGAZ Group	Higher management	49	90.74%	54
	Mid-level management	333	98.23%	339
	Other management positions	257	99.61%	258
	Specialists with higher education	1,098	99.01%	1,109
	Specialists without higher education	176	99.44%	177
	Workers	3,874	99.92%	3,877
<b>TOTAL</b>	Romgaz	5,292	99.57%	5,315
	Depogaz	483	99.18%	487
	Romgaz Black Sea Limited	12	100.00%	12
	<b>ROMGAZ Group</b>	<b>5,787</b>	<b>99.54%</b>	<b>5,814</b>

Note: The table with data at the branch level, considering that employee performance evaluations were conducted in different periods (April 30, 2024, for Romgaz and January 31, 2024, for Depogaz and RBS).

### The average number of training hours per employee by categories in 2024

Employee category	Number of employees	Total number of training	Average training hours
Higher management	55	766	13.93
Mid-level management	347	7,976	22.99
Other management positions	259	4,746	18.32
Specialists with higher education	1,173	14,557	12.41
Specialists without higher education	180	507	2.82
Workers	3,963	37,794	9.54
<b>ROMGAZ Group</b>	<b>5,977</b>	<b>66,346</b>	<b>11.10</b>

Note: In the calculation of the average number of training hours, broken down by job category, the training hours of the members of the Board of Directors of S.N.G.N. Romgaz S.A. were not included.

#### 7.3.7 S1-14: Health and safety metrics

ROMGAZ Group has implemented an ISO 45001: 2023 occupational health and safety management system, ensuring compliance with all applicable legal requirements in the field: Law 319/2006; Government Decision 1425/2006; Government Decision 355/2007. This system is externally certified.

According to Appendix C (ESRS), the company may omit reporting non-employees for the first year of preparing its sustainability statement, which is why the information presented in the tables from S1-14 regarding health and safety indicators does not include non-salaried workers.

#### Information regarding health and safety indicators

Indicator	ROMGAZ Group
Number of employees covered by the health and safety management system, according to legal requirements and (or) recognized standards or guidelines	5,977
Percentage of employees covered by the health and safety management system	100%
Number of fatalities in the workforce resulting from work-related accidents and health conditions caused by work	0
Number of fatalities resulting from work-related accidents and health conditions of other workers (such as workers in the value chain) working on the company's premises.	0

Indicator	ROMGAZ Group
Number of accidents at work recorded for own workforce	7
Total number of hours worked by own workforce	11,645,065
Rate of accidents at work for own workforce	0.65
Number of work-related illness cases recorded for employees	0
Number of lost days due to work-related accidents and fatalities caused by work-related accidents, occupational diseases, and fatalities caused by occupational diseases among employees	477

Indicator	ROMGAZ Group
Number of own workers covered by a health and safety management system based on recognized legal requirements and/or standards or guidelines and which has been audited internally and/or audited or certified by an external party	5,965
Percentage of own workers covered by a health and safety management system based on recognized legal requirements and/or standards or guidelines and which has been audited internally and/or audited or certified by an external party	100%
Please give a statement if your system, health and safety management authority, or certain parties, has been subject to internal audit or external certification and the standards on which they are based, or their absence	The ISO management system is audited annually by a third party and recertified every two years.

Note: In the calculation of the number of own workers covered by a health and safety management system, based on legal requirements and/or recognized standards or guidelines, and which has been internally audited and/or audited or certified by an external party, the total of 12 RBS employees was not included, as no internal audit was conducted for them.

### 7.3.8 S1-16: Compensation metrics (pay gap and total compensation)

ROMGAZ Group	
Gross wage/hour level by gender	2024
Female	82.01
Male	62.16
Gender pay gap	-31.93

ROMGAZ Group does not discriminate based on gender and, through its adopted policies, promotes diversity and inclusion in the workplace. In its industry, wage differences between men and women are influenced by the specific nature of the jobs. For example, in the "Workers" category, jobs involving a high degree of risk are predominantly occupied by men, which leads to higher salary bonuses.

However, within ROMGAZ Group, the wage ratio between men and women varies depending on the hierarchical level. While the ratio favours men in the "Workers" category, this changes in Middle and Top management positions, where women's salaries are, on average, higher than those of men. Overall, the general ratio between the average salaries of women and men in the company is significantly favourable to women, an aspect strongly influenced by the distribution of female employees across different roles.

The gender pay gap has been calculated using the formula from the ESRS S1 standard:  $(\text{Average gross hourly salary of men} - \text{Average gross hourly salary of women}) / \text{Average gross hourly salary of men} \times 100$ .

For this analysis, data reflecting employees' gross hourly salaries were used. The calculation considered all positions in the company, regardless of hierarchical level. The gross hourly salary was determined by dividing the gross monthly salary by the total number of hours worked. The differences in remuneration are influenced by objective factors such as job distribution, industry specifics, and applied wage policies.

ROMGAZ Group	2024
Annual total compensation for the best-paid person of the Company	634,733.36
Total annual average remuneration for all employees of the organization (except the most paid person)	162,590.64
Rate of total annual remuneration	3.90

### 7.3.9 S1-17: Incidents, complaints and severe human rights impacts

In the reporting period, there were no confirmed human rights violations and no diversity, equal opportunities, discrimination or harassment related complaints. Also, in 2024, there was no financial loss as a result of judicial proceedings relating to discrimination at work or breaches of labour law.

## 8 ESRS S4 - Consumers and end-users

### 8.1 Strategy

#### 8.1.1 ESRS 2 SBM-2: Interests and views of stakeholders

Consumers and end-users are one of ROMGAZ Group's relevant stakeholders' groups, and the Company's policies integrate their rights, interests and views, as well as their adherence to human rights principles.

By the activity provided, the categories of clients in the portfolio are:

- Industrial end-users;
- Producers and suppliers of heat and electricity for the public;
- Traders;
- Operators of natural gas distribution, transmission, and storage systems for technological consumption.

The company's business model and strategy regarding this stakeholder group aim at:

- Digitizing the interaction with them, including the creation of a dedicated IT platform to improve their experience and access to information.
- Increasing information systems security for consumer data protection and privacy.
- Implementing continuous service improvement processes, including data privacy, based on customer feedback.

For the next strategic period, ROMGAZ Group intends to attract large wholesale end customers in its portfolio and provide direct services to retail customers.

Thus, ensuring the confidentiality of customer data becomes a material issue for ROMGAZ Group. This involves having contractual policies that incorporate principles of confidentiality and securing platforms and stored information.

Consumers and end-users have contributed and may continue to directly contribute to the business model and operational structure of ROMGAZ Group through the annual customer satisfaction evaluation process. This process is documented and integrated into the quality management system, as described in sections S4-1 and S4-2. Additionally, the method of involvement and the procedure for addressing any complaints and customer concerns are presented in Section S4-2.

Customer recommendations are analysed and, where feasible, integrated into ROMGAZ Group processes. If cases of non-compliance are recorded, they are remedied and internal processes reviewed.

Furthermore, the interests, views and rights of consumers and end-users were also considered in the double material assessment process through the questionnaires transmitted to them.

The company maintains communication with the stakeholders through the following channels: [Audience program | Romgaz](#) and [Contact | Romgaz](#).

The Romgaz and Depogaz policies on consumer and end-user confidentiality are similar. In addition, the two companies have certain common customers. Therefore, the information presented in this section covers both entities.

RBS had no customers and end-users during 2024.

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

Risk identification, including those related to the confidentiality of consumers and end-users, is regulated at ROMGAZ Group through the “Risk Management” system procedure. ROMGAZ Group took into account this procedure, as well as the ESRS requirements throughout the double materiality assessment, and analysed the impacts, risks, and opportunities related to customers and end-consumers.

During the double materiality assessment, ROMGAZ Group considered:

- a) **Consumers affected by products and services:** ROMGAZ does not produce or trade products that are inherently harmful to people or that increase the risk of chronic diseases. Instead, the company supplies natural gas and related services under conditions that meet the safety standards and applicable regulations.
- b) **Consumers affected by their interaction with the company.** The company manages a variety of consumers and end-users data and information. Therefore, protection of personal data and confidentiality is a priority for ROMGAZ Group.

The topics identified as material, referring to consumers and end-users, are presented below:



**IROs related to consumers and end-users**

**Legend:**

Type of impact: F = financial impact, M = material impact, MF = material and financial impact

Time Horizon: A = actual impact (reporting year), P = potential impact (medium and long term)

Source of impact: S = impact derived from strategy and business model, B = impact that underpins strategy

Material sub-topic and Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Information impacts for consumers and/or end-users <b>Confidentiality</b>	Own activity /Value chain	M	B	A	The policies and measures implemented by the company allowed for an incident free history related to customer data confidentiality.	-	-	-	

Since ROMGAZ Group did not record any information confidentiality incidents during the reporting year, the impact was considered positive and current.

No specific categories of consumers or end-users exposed to a higher risk of harm were identified.

ROMGAZ Group does currently not differentiate between specific groups of consumers and end-users and applies the same standards and protection measures with no distinction.

ROMGAZ Group plans to expand its activities in the competitive supply market for small domestic and non-domestic customers over the next 2 years. By the time this service is launched, the company intends to create the necessary framework for this category of consumers, including provisions to cover vulnerable consumers.

To retain current customers and expand its business model to other categories of consumers in the next two years, ROMGAZ Group intends to maintain the current regulatory framework regarding customer data confidentiality, to minimize any financial and reputational risks that may result from such incidents.

## 8.2 Impact, risk and opportunity management

### 8.2.1 S4-1: Policies related to consumers and end-users

To manage the risks, opportunities and impacts on consumers, ROMGAZ Group has put in place the following policies and procedures:

- [Code of Ethics and Conduct in Business](#). This document defines the behaviour expected in relation to customers and end-users and promotes an organizational culture based on compliance with applicable laws and regulations.
- [Privacy policy on the protection of personal data](#). This policy underlines ROMGAZ's commitment to protect consumer rights, including the right to privacy, by implementing appropriate technical and organizational measures for data processing. The policy can be found on Romgaz's official website, as well as in the Internal Regulation, in line with the requirements of European legislation, including Regulation (EU) 679/2016.
- ROMGAZ's IT security policy and internal regulations are accessible through the Infoweb platform. This policy supports compliance with customer privacy rights.
- Internal procedures for customer relationship management. They include regulations covering contract negotiations, business relation management, complaints management, including those that may relate to data privacy.

The primary responsibility for the implementation and monitoring of policies lies with the Director-General.

ROMGAZ Group complies with a set of requirements outlined in internationally recognized standards and regulations, considering the importance of protecting consumer and end-user data and information. They include:

- ISO/IEC 27001 - Information Security Management. This standard ensures the protection of consumer data, including information related to energy consumption or their accounts.
- Directive 2019/944/EU on electricity. This directive guarantees consumer rights, such as the choice of suppliers, fair billing, and access to clear information.
- Natural Gas Directive (2009/73/EC). It establishes the rights of gas consumers, including the protection of vulnerable consumers. The ANRE Order on last resort suppliers details these obligations.
- ISO 27019 - Cyber security for critical energy infrastructure. This protects smart energy networks and consumer data.

The policies adopted are applicable to all consumer groups in the portfolio. No revisions of these internal documents were recorded during 2024.

The Company uses appropriate technology to communicate its policies, including secure platforms, IT equipment, and specialized software, to facilitate access to information. The Company's policies are published on its website, while consumer rights and obligations are incorporated into contracts, sent via e-mail, and also included in internal training programs for employees.

Additionally, the Company considers potential communication barriers, such as territorial proximity, the lack of technology access for end users (e.g., absence of necessary equipment or software), and the use of incomplete or misaligned databases.

ROMGAZ Group's policies comply with the UN Guiding Principles on Business and Human Rights, the ILO Statement on Fundamental Rights at Work and the OECD Guidelines for Multinational Enterprises.

In 2024, ROMGAZ Group has not received any information regarding non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises involving consumers and/or end-users within the value chain.

To prepare for future reporting processes on these matters, the "Responsible and Sustainable Procurement Policy" and the "Supplier Code of Conduct" were approved in January 2025.

#### 8.2.2 S4-2: Processes for engaging with consumers and end-users about impacts

In accordance with specific regulations, including Order No. 173/2020 issued by ANRE, ROMGAZ Group directly collaborates with end consumers and natural gas distribution operators, in its capacity as natural gas supplier, to facilitate the efficient resolution of any issues related to the services provided.

Consumer consultation is important to the Company and is based on the following methods:

1. **Surveys and questionnaires:** Annually assess consumer satisfaction levels and identify potential improvements. The results are centralized, analysed, and reported to management.
2. **Permanent feedback channels:** Dedicated communication lines and e-mail addresses ([petitii@romgaz.ro](mailto:petitii@romgaz.ro); [fui@romgaz.ro](mailto:fui@romgaz.ro); [secretariat@romgaz.ro](mailto:secretariat@romgaz.ro)) have been implemented to allow consumers to report issues of concern, including confidentiality-related matters.

Additionally, consumer interests, perspectives, and rights were considered in the double materiality assessment through questionnaires sent to customers and end users regarding ROMGAZ Group's material topics.

All data collected during consumer consultation processes is processed in compliance with confidentiality standards and GDPR regulations. The consultation results are analysed and if needs or opportunities for process improvement are identified, they are planned for implementation.

Through the double materiality assessment, ROMGAZ Group has identified that consumer data protection is essential for maintaining a strong reputation. Therefore, collaboration with consumers to identify privacy risks is a priority and includes:

- Identifying specific risks: The company conducts periodic tests to detect potential privacy threats, such as unauthorized access or data breaches, through direct consultations with consumers and data protection experts.
- Defining protective measures: ROMGAZ implements data security policies, advanced encryption, and access control systems, ensuring compliance with GDPR and other applicable regulations.

Regarding transparency towards consumers, the Company ensures that consumers are informed about how their data is collected, used, and protected through the publication of the "Privacy Policy on Personal Data Protection".

Additionally, ROMGAZ Group informs consumers about the measures and processes implemented for data confidentiality protection. This includes:

- Publishing the Privacy Policy and details about consumer rights under **GDPR** or other applicable regulations. These details are available on the company's website.
- In case of a crisis caused by major changes or security incidents, the Company has communication tools in place to notify consumers directly or through official channels such as the website, social media platforms, or mass media outlets.

Internal processes are updated based on consumer feedback or in response to legislative changes.

The operational responsibility for ensuring collaboration with consumers and end-users, as well as integrating the results into the company's approach, lies with ROMGAZ structures managing contracts with end users. These include: Energy Commercialization Directorate Services Iernut Branch, Mediaș Branch, Târgu Mureș Branch.

ROMGAZ Group evaluates the effectiveness of consumer collaboration through annual surveys. Additionally, the Company monitors relevant legislative changes and updates its processes as needed to ensure compliance with current requirements.

### 8.2.3 S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Although no privacy breaches or data losses have been recorded, the company has implemented and maintains a set of remediation processes and reporting channels for such events.

Consumers and end users can express their concerns or needs through business relationship channels, which are detailed in the contracts and on the Company's website, as previously described in Section S4-2.

Additional available channels include:

- **E-mail:** Consumers can submit complaints or privacy concerns via the dedicated e-mail addresses: [secretariat@romgaz.ro](mailto:secretariat@romgaz.ro), [comunicare@romgaz.ro](mailto:comunicare@romgaz.ro);
- **Telephone:** A direct phone line is available for consumers to contact company representatives to report issues or request information: General line: +4-0374-401020, Fault reporting line: +4-0374-474325 (available 24/7);
- **Written correspondence and courier services:** Consumers can send formal complaints via courier services to ensure an official method of communication;
- **Online Contact Form:** [Contact Form | Romgaz](#);
- **Direct meetings:** Consumers have the option to address their concerns in a confidential and secure manner with the Ethics Advisor or the Public Whistleblower.

These reporting mechanisms are accessible to all consumers and end users who may be potentially or directly affected. They are also available to individuals or organizations acting

on their behalf or those capable of identifying and reporting negative impacts. ROMGAZ Group accepts complaints submitted by legal representatives or consumer advocacy organizations, provided they have the explicit consent of the consumer to act on their behalf. In such cases, personal data protection is ensured, and sensitive information is shared only with authorized parties.

Consumer complaints are managed by trained personnel who must comply with data protection policies, and the information is used exclusively for the investigation and resolution of the complaints.

All complaints are processed in accordance with current legislation (GDPR), ensuring that consumer rights regarding personal information is fully complied with.

Consumers are informed about the purpose and use of communication channels and have the option to escalate complaints to higher levels if they are not satisfactorily resolved. The procedures for handling, analysing, and responding to complaints are governed by data protection policies and IT security procedures outlined previously.

All complaints and reports receive a response within the legal deadline.

ROMGAZ Group promotes a safe and open environment for consumers and end users, ensuring that any concern or request submitted through the available channels is handled without negative consequences for the individuals reporting them.

During the reporting period, no privacy-related complaints were recorded.

For current and publicly relevant information, consumers can visit Company website at [Romgaz | Romgaz \(www.romgaz.ro\)](http://Romgaz | Romgaz (www.romgaz.ro)).

#### **8.2.4 S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions**

No material negative impacts, risks, or opportunities have been identified throughout the double materiality assessment.

Under these circumstances, the Company's measures aim at maintaining its incident-free record regarding customer privacy.

The adopted measures include:

- Compliance monitoring through the Personal Data Protection Department (GDPR), which evaluates and advises organizational structures on meeting legal requirements;
- Implementation of international standards, such as ISO/IEC 27001, for information security management;
- Updating relevant information for consumers in compliance with legal requirements and providing specific resources related to data protection and other relevant aspects, accessible at: [Privacy policy on the protection of personal data](#);
- Employees responsible for preserving the confidentiality of customer data are trained annually on the importance of data security, through training sessions on employment and regular information. ROMGAZ Group employs open-source solutions to conduct phishing tests, aiming to raise employee awareness about cybersecurity threats that could lead to potential data leaks. Additionally, the company distributes internal notices and communications that provide employees with guidelines on preventing phishing attacks and avoiding spam messages;
- Periodic IT system evaluations conducted twice a year through vulnerability scans within the company's intranet. Over the past three years, two penetration tests have been carried out as part of major IT/TC projects;
- Encryption and data protection processes for mobile devices, as well as encryption and security mechanisms for servers provided by IT platforms. In centralized solutions handling GDPR data, the company utilizes hot and cold backup mechanisms, ensuring

secure data restoration. Computer equipment is protected through up-to-date antivirus and anti-malware solutions. The e-mail system features threat detection and blocking mechanisms, while internet access is restricted and filtered to reduce navigation-related risks.

In consideration of its needs, the Company allocates annual resources as part of its investment plan to develop digital platforms, such as interactive websites and dedicated portals that facilitate quick and easy access to information and support, while ensuring data security as an integral part of client confidentiality.

For the reporting year, the company allocated 613,950.94 thousand RON for activities related to "IT Infrastructure Expansion - Data Center." The financial resources allocated in 2024 are mentioned in the annual consolidated financial statements in the additions to fixed assets note 12.

For 2025, ROMGAZ Group has planned to document a set of measures that include revising GDPR and IT-related documents to maintain and even enhance confidentiality levels.

By 2030, ROMGAZ Group intends to implement projects that focus on digitizing certain company processes, including those related to customer interactions. In the absence of adequate policies and measures or following a decline in the effectiveness of current monitoring processes, digitalization efforts could introduce additional risks, even though the double materiality assessment did not initially identify them as material. For example, an external risk is that the level of sophistication of cyber-attacks is increasing and, to address this, security measures have been taken, as presented above.

A possible internal risk is the need to enhance the digital competencies within the workforce. This is also addressed through the training sessions mentioned.

ROMGAZ Group integrates consumer-related risks into its general risk management system, ensuring compliance with regulations, supply security, and data protection.

## 8.3 Metrics and targets

### 8.3.1 S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

To manage the impacts, risks, and opportunities related to consumers (including the confidentiality of their information), the following targets have been established:

- Maintaining the consumer and end-user satisfaction rate at 75% for Romgaz and 86% for Iernut. The methodology and calculation model is included in the operational procedure "Evaluation of client satisfaction". No targets were set for Depogaz and RBS.
- Maintaining the number of IT system shutdowns due to cyberattacks at zero for Romgaz. The target achievement rate was 100%. No targets were set for Depogaz and RBS.

Performance is monitored quarterly, and the targets have been met.

The targets were defined with the involvement of shareholders, the Board of Directors, and senior management to reflect the organization's strategic priorities and objectives.

The following table presents the progress made during the 2024 reporting period in achieving the targets set for Romgaz:

Reporting period 2024	
<b>Romgaz</b>	
	<b>Customer Satisfaction Assurance</b>
Target Value	75%
Intermediate steps	quarterly
Performance Achieved	100%
<b>Iernut</b>	
	<b>Customer Satisfaction of SPEE Iernut</b>
Target Value	85%
Intermediate steps	quarterly
Performance Achieved	100%

Customer satisfaction is assessed annually. The assessment for 2024 will be performed in the first quarter of 2025. Therefore, at the time of publishing this Sustainability Statement, the data is not yet available. In the latest assessment conducted in 2024 for the year 2023, the results were:

Customer satisfaction [%]								
2023	Natural Gas	Electricity	Distribution Service	RK Services	OS Services	Electrical works	Car Transport Services	Maintenance Services
	98	97.78	96.7	87.12	100	95.5	93.28	95.5

## 9 ESRS G1 - Business conduct

### 9.1 Governance

#### 9.1.1 ESRS 2 GOV-1: The role of the administrative, supervisory and management bodies

The General Meeting of Shareholders (GMS) or the Sole Shareholder, in the case of subsidiaries, is the governing body of the Company that decides, among other responsibilities, on the rules of professional conduct. The GMS or the Sole Shareholder appoints the Board of Directors (BoD), which is responsible for oversight and strategic guidance, including for the development of policies related to professional conduct. The Board of Directors of ROMGAZ Group has delegated the management of the Company to three executives: the Chief Executive Officer (CEO), the Deputy CEO, and the Chief Financial Officer (CFO).

The CEO plays an important role in implementing and promoting the company's ethical culture. To manage aspects related to professional conduct, the CEO has issued decisions designating Ethics Advisors, as follows:

- A Chief Ethics Advisor;
- An Ethics Advisor with responsibilities at the level of S.N.G.N. Romgaz S.A.;
- An Ethics Advisor with responsibilities for the Mureş Branch, STTM Târgu Mureş, and SPEE Iernut;
- An Ethics Advisor with responsibilities for the Mediaş Branch and SIRCOSS.

Additionally, at the level of Depogaz and RBS, there is one designated Ethics Advisor.

According to the Code of Ethics and Business Conduct, Ethics Advisors monitor the implementation and compliance with professional conduct, ethics, and integrity standards within ROMGAZ Group. They provide ethical advice, analyse reports regarding employee behavior, and propose measures to improve professional conduct. They also prepare semi-annual reports on compliance with ethics and conduct standards, assessment of integrity incidents, and management of reports and complaints. These reports are submitted to the CEO, and after approval, they are forwarded for information to the Monitoring and Coordination Committee for the Implementation and Development of the Internal Managerial Control System, as well as to the Audit Committee.

Regarding compliance, conduct and conflicts of interest, the Audit Committee within the Board of Directors operates under the "[Internal rules of the Audit Committee](#)". The Audit Committee has the following responsibilities:

- Monitoring compliance with conduct standards by analysing semi-annual reports;
- Ensuring the existence and implementation of the Code of Ethics and the Conflict-of-Interest Policy;
- Providing ethical and conflict of interest advice to the Board of Directors and the CEO;
- Conducting an annual assessment of conflicts of interest for administrators based on independence statements.
- Reporting quarterly to the Board of Directors on the activities carried out.

The expertise of the Board of Directors in ethical conduct is essential for creating an organizational culture based on integrity. Board members are knowledgeable about legal regulations and international standards regarding business ethics and conduct, as well as governance principles that promote transparency, accountability, and fairness. In this regard, they have adopted a Code of Ethics and Business Conduct for the company. By promoting ethical values, the Board plays a crucial role in protecting the company's reputation and maintaining an ethical, professional, and responsible environment.

Elements related to ethics, integrity, and governance are included in the "[Letter of Expectations](#)" under Section VII - "Elements of Ethics, Integrity, and Corporate Governance at ROMGAZ Group." This document outlines the expected performance of the management and



administrative bodies in these areas, and the criteria considered in the selection of administrators.

The members of the Board of Directors and the executive management are selected based on their competencies and diverse experience and, in their activities, adhere to the principles of ethics and integrity outlined in the applicable legislation governing commercial companies. According to Article 8.6 of the mandate contracts, "Administrators are required to participate annually in a professional training program of at least one week, which includes training sessions in corporate governance, legal matters, and other relevant areas for the company's operations."

In 2024, the members of the Board of Directors attended five training sessions, ranging from 8 to 56 hours in duration. These sessions covered topics such as ESG concepts and sustainability, promoting best business practices, strengthening a strong corporate governance culture, and the dynamics of relationships between the Board of Directors and the CEO. In total, the seven Board members accumulated 224 hours of training.

### 9.1.2 ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities

The risk management process, including those related to business conduct, takes place in Romgaz under the integrated system procedure "Risk Management". According to this procedure, the organizational unit responsible for risk management is the Objective and Risk Management Office within the Strategy, International Relations, and European Funds Directorate. Decisions regarding risk management are made by the Monitoring Committee, which consists of executive directors, and coordinated by a chairperson, and that is assisted by the Technical Secretariat of the Monitoring Committee.

Unlike Romgaz, in Depogaz, the risk management process, including those related to business conduct, is carried out in accordance with the system procedures "Risk Management" and "Methodology for identifying risks and vulnerabilities to corruption".

Within the Boards of Directors of both Romgaz and Depogaz, a Risk Management Committee operates, with responsibilities in the field of sustainability and ESG obligations. This committee oversees risk management at all organizational levels and is responsible for sustainability-related matters and ESG obligations.

In the reporting year, RBS did not have such a committee and had no specific risk assessment procedure applicable to the business conduct. RBS, in 2024, from the perspective of professional conduct, aligned itself with Romgaz's Code of Ethics and Business Conduct.

Among the relevant criteria for identifying impacts, risks and opportunities related to business conduct are:

- **Location:** The analyses take into account Romgaz's eight branches;
- **Activity:** All operational segments of ROMGAZ Group are evaluated, including natural gas exploration and production, underground gas storage, natural gas supply, special operations and well services, maintenance and transport services, electricity production and supply, and natural gas distribution. The evaluation process includes both the value chain and internal operations.
- **Sector:** ROMGAZ Group aligns its risk analysis with international standards applicable to the natural gas production industry, as well as the requirements of national and international authorities regarding integrity and ethical behavior.
- **Transaction structure:** In commercial relationships and partnerships with other companies and entities, risks related to contractual non-compliance are assessed, along with opportunities for expansion and innovation.

Risk assessment within the Company is conducted annually, using operational risk management tools such as the Risk Register, Significant Risk Register, Report on the Status of Control Measures Implementation, and Risk Profile. All material identified risks, including those related to corporate culture, are escalated to the company level and analyzed by the Monitoring

Committee to determine risk treatment measures. The committee develops the Implementation Plan for Control Measures for material risks.

To identify risks related to corporate culture, in addition to existing risk assessment procedures, ROMGAZ Group conducted a double materiality assessment in accordance with ESRS requirements.

As a result, corporate culture and the prevention and detection of corruption and bribery, including related training, have been identified as material topics. Based on the business model and strategy, these topics can generate both current and potential positive and negative impacts. However, proper management of these material topics can turn these impacts into opportunities.

Information on the identified impacts and opportunities is presented in the following section:

## IROs related to Business Conduct

### Legend:

Type of impact: F = financial impact, M = material impact, MF = material and financial impact

Time Horizon: A = actual impact (reporting year), P = potential impact (medium and long term)

Source of impact: S = impact derived from strategy and business model, B = impact that underpins strategy

Material topic, Material sub-topic, Material sub-sub-topic	Location of impact	Type	Source of impact	Time horizon	Positive impacts (I+)	Time horizon	Negative impacts (I-)	Risks (R)	Opportunities (O)
Business Conduct <b>Corporate culture</b>	Own Activity	MF	B	A, P	Governance policies create a fair and inclusive work environment, prevent discrimination and ensure respect for employees' rights. The policies ensure a robust ethical framework that protects whistleblowers.	A, P	ROMGAZ Group is a company listed on (BVB). A weak corporate culture can lead to a lack of trust among employees, investors, and other stakeholders, potentially resulting in financial consequences such as high employee turnover rates, a decline in attractiveness for investors, and a negative impact on business partnerships.	-	The positive reputation created by the transparent cooperative culture can facilitate access to new business partners (i.e. Neptun Deep) and to local and international financing.
Business Conduct <b>Corruption and bribery Prevention and detection, including training</b>	Own activity/value chain	MF	S	A	Training policies and programs reduce corruption risks by promoting professional integrity and ethics among employees.		-	-	The existence of anti-corruption rules and measures contributes to improving the reputation and brand image of the company with a positive impact on potential partnerships beneficial to the Company.

## 9.2 Impact, risks and opportunity management

### 9.2.1 G1-1: Business conduct policies and corporate culture

The Company has been listed on the Bucharest Stock Exchange (BVB) since 2013, complying with capital market regulations and adhering to the BVB Corporate Governance Code. The Company applies the provisions of this code, which include the responsibilities of the Board of Directors, risk management and internal control, fair remuneration and motivation, as well as value creation through investor relations. Moreover, ROMGAZ Group has adopted its own corporate governance code and follows the "Apply or Explain" principle for self-assessment of best practice principles and recommendations.

In line with corporate governance principles based on legislative standards and best practices, ROMGAZ Group has established the necessary mechanisms to ensure compliance with these principles by adopting and implementing various regulations and policies.

Among the general objectives of ROMGAZ Group's corporate governance system are those related to corporate governance such as promoting integrity, ethical behavior, and professional competence within the management team and employees, as well as ensuring the Company's sustainable development. ROMGAZ Group's strong corporate governance relies on several pillars, with those specifically related to maintaining an adequate corporate culture including:

- National Anti-Corruption Strategy 2021-2025 (SNA): It covers the revision of the Code of Ethics and Business Conduct, awareness and advisory sessions for employees, perception studies, and the promotion of ethical values and principles.
- ISO 37001:2017 Standard: Full implementation of the anti-bribery management system.
- Monitoring of objectives and indicators: Constant oversight of goal achievement and performance.
- Compliance with corporate governance principles: Alignment with national regulations and the BVB Corporate Governance Code.
- Evaluation of transparency and governance measures: Conducted monthly, with reports submitted to the public supervisory authority.

At the same time, professional conduct and corporate culture at ROMGAZ Group are governed by the Code of Ethics and Business Conduct and the Corporate Social Responsibility Policy.

#### **Romgaz:**

The [Code of Ethics and Business Conduct](#) is a fundamental document that establishes Romgaz's commitments regarding shareholders, compliance with competition laws, integrity assurance, and the prevention of corruption and fraud.

To achieve the Company's objectives, mission, and vision, Romgaz personnel must adhere to the core values, general principles, and professional conduct, ethics, and integrity norms specified in this Code. Its provisions are mandatory and apply directly across all organizational structures of the company, including its management, employees, Directors with mandate contracts, and Board members. These rules govern internal relationships within the organization as well as interactions with business partners, clients, suppliers, shareholders, collaborators, civil society, media, local communities, and other stakeholders, including subsidiaries.

This Code references the National Anti-Corruption Strategy 2021-2025 and emphasizes the importance of applying the precautionary principle and respecting human rights. The Romgaz Code of Ethics and Business Conduct serves as a guide for daily interactions, reflecting the company's beliefs, values, and principles, as well as its expectations regarding the behavior of individuals conducting business on its behalf, ensuring full alignment with the Code's provisions.

The Code of Ethics and Business Conduct is available to all stakeholders in Romanian and English on the website [www.romgaz.ro](http://www.romgaz.ro) under Sustainability, Ethics and Integrity section.

#### **Depogaz:**

Depogaz implements its own Code of Ethics and Integrity and the "Reporting Irregularities by Whistleblowers" procedure for the identification, reporting, and investigation of concerns related to illegal behavior or breaches of the code of conduct. These mechanisms enable both

internal and external stakeholders to report concerns, ensuring a transparent and effective process for handling irregularities.

Currently, RBS has adopted Romgaz's corporate culture policies.

Potential breaches of business conduct, ethics, and integrity by directors or administrators will be reviewed within the provisions of their mandate or administration contracts by the Audit Committee. In the area of Compliance, Conduct, and Conflict of Interest Coordination, the Audit Committee of the Board of Directors has the following responsibilities, as outlined in its Internal Regulations:

- Ensuring that the Company's policies and practices comply with applicable laws and regulations, regulatory authority recommendations, the tutelary authority, and best practices.
- Taking all necessary measures to ensure that the company adopts a Code of Ethics and Business Conduct. Once the Code has been adopted, the Audit Committee will review its implementation and efficiency at least once a year;
- Reviewing the implementation of the Conflict of Interest Policy (or equivalent provisions).

### **Business Conduct Training Policy**

ROMGAZ Group supports the training and professional development of employees on the content of policies related to the professional conduct. Training programs are part of the annual training and development plan. Each new employee is required to participate in training on corporate culture topics, and on an annual basis, awareness, training and information sessions are held to ensure continuous information. More information on training programs can be found in ESRS S1 - Own workforce page 118.

### **Whistleblowers**

#### **Romgaz**

At Romgaz, the whistleblower institution is implemented, allowing the reporting of grievances and requests for counseling on ethics and integrity, both for employees and the general public. The reporting channels are described in ESRS 2, SMB 2, page 24 section.

Romgaz ensures the protection of whistleblowers in accordance with applicable legislation and its internal procedure "Managing Reports and Protecting Whistleblowers. In accordance with Law no. 361/2022 on the protection of whistleblowers, information regarding legal violations includes reasonable suspicions of actual or potential violations that have occurred or may occur within public authorities, public institutions, other legal entities of public law, or private legal entities with which the whistleblowers have been in contact during their professional activities.

If the reported individual is a direct or indirect superior, or a person with control, inspection, or evaluation responsibilities over the whistleblower, the disciplinary investigation committee will protect the whistleblower's identity. Whistleblowers benefit from presumption of good faith as per legal provisions, until proven otherwise. According to the [Code of Ethics and Business Conduct](#), Romgaz management prohibits any form of retaliation against anyone, including management members and employees, who in good faith report violations of the law, professional conduct standards, ethics, and integrity within their professional context, regardless of whether the violations are known or suspected.

Any act of retaliation will lead to disciplinary measures against those responsible. Additionally, the same disciplinary measures will be applied to individuals who intentionally provide false information in reports or complaints.

The results reported to the CEO will be forwarded for information to the Monitoring and Coordination Committee for the Implementation and Development of the Managerial Internal Control System and to the Audit Committee of the Board of Directors within the first two months of 2025.

#### **Depogaz**

Depogaz complies with the requirements of Law no. 361/2022 on the protection of whistleblowers, with subsequent amendments and additions, ensuring alignment with the national legislation transposing Directive (EU) 2019/1937. In this regard, the system procedure

"Reporting Irregularities by Whistleblowers" regulates reporting methods, necessary steps, involved documents, and protection against discrimination for individuals reporting irregularities. Any person can use the dedicated whistleblower e-mail address - [avertizor@depogazploiesti.ro](mailto:avertizor@depogazploiesti.ro) - for reporting, benefiting from confidentiality and a prompt and fair resolution.

Depogaz employees receive periodic training on the "Reporting Irregularities by Whistleblowers" procedure, and the Ethics Advisor, responsible for receiving reports, attended a professional course in 2024 on integrity and decision-making transparency. Additionally, measures are in place to protect whistleblowers from retaliation, encouraging the reporting of any violations of the law or the Code of Conduct. The procedure ensures whistleblower confidentiality and the proper resolution of reports. Regarding investigations of corruption incidents, including bribery and extortion, Depogaz adheres to legislative regulations and internal procedures to ensure prompt, independent, and objective investigations. Furthermore, the organization has established a Corruption Risk Register and an internal list of sensitive functions.

At this moment, RBS has adopted Romgaz's policies on whistleblowers.

The Ethics Advisor plays an active role in educating and raising awareness among employees regarding ethics and integrity.

The 2024 Ethics Advisors' Report highlights potential deviations from the norms of conduct established in the Code of Ethics, Internal Regulations, and the Collective Labor Agreement. As part of advisory activities, one employee sought assistance regarding the application of norms of conduct, while 24 employees involved in disciplinary investigations received counselling, in accordance with the responsibilities of the Ethics Advisor.

#### **Romgaz**

At Romgaz, annual evaluations of employees' adherence to professional conduct, ethics, and integrity norms are conducted and presented in the semi-annual reports of the Ethics Advisor.

In 2024, these evaluations took place in December, using a questionnaire designed to measure employees' awareness and compliance with the Code of Ethics and Business Conduct. The questionnaire assessed knowledge of the Ethics Advisor's role, employees' perceptions, and their understanding and adherence to the Code of Ethics and Business Conduct within S.N.G.N. Romgaz SA. It was distributed through available IT applications, with support from the IT Directorate and the Communication Service, reaching all employees with company e-mail addresses.

The results reported to the General Director will be forwarded for review to the Monitoring and Coordination Commission for the Implementation and Development of the Internal Managerial Control System and the Audit Committee of the Board of Directors in the first two months of 2025.

Internal resources were used for these actions. For the reporting year, the company set a target to train all new employees on corporate culture, which was successfully achieved. Since the company establishes annual targets regarding corporate culture, long-term targets cannot be presented.

#### **Depogaz**

At Depogaz, in 2024, the Ethics Advisor trained a sample of employees, including heads of organizational units, as per the organizational chart, as well as employees in executive positions, totaling 170 people. Internal resources were used for this training. Depogaz did not set specific targets and has not established a measurable long-term target.

#### **RBS**

At this stage of development for this subsidiary, no specific actions have been implemented, and no measurable targets have been set for the reporting year or the long term.

RBS, in 2024, from the perspective of professional conduct, aligned itself with Romgaz's Code of Ethics and Business Conduct, by adopting it by the organization.

### 9.2.2 G1-3: Prevention and detection of corruption and bribery

During the year there was no specific anti-corruption policy, but a document is in preparation and is expected to be approved in the first semester of 2025.

Through Government Decision no. 1269/2021 the National Anti-corruption Strategy 2021-2025 was adopted. This national strategy is aligned with international frameworks, such as GRECO and the Cooperation and Verification Mechanism, as well as their associated objectives. In this context, ROMGAZ Group has adopted the Declaration on the Commitment to the Organizational Integrity Agenda within the framework of the National Anti-Corruption Strategy 2021-2025, as well as the Integrity Plan 2022-2025. These documents, publicly available on the Company website, reinforce the company's stance on condemning all forms of corruption, conflicts of interest, and incompatibilities, recognizing them as factors that undermine the company's objectives and public trust.

Provisions relating to corruption and bribery are included in the Code of Ethics and Business Conduct, under Subchapter III 2. Anti-corruption and anti-fraud.

#### **Romgaz**

Since August 2023, the company has implemented an operational procedure for identifying, analyzing, and managing corruption risks.

Romgaz employs an integrated system for corruption prevention and detection, which includes internal procedures such as:

- Identification, analysis and managing corruption risks;
- Managing reports and ensuring whistleblower protection;
- Preventing potential conflicts of interest.

Additionally, the company applies the Code of Ethics and Business Conduct, provides confidential reporting mechanisms, offers training programs and periodic employee awareness sessions, and conducts internal audits of critical processes (e.g., procurement, contracting, contract monitoring, etc.). Romgaz's leadership remains committed to establishing adequate and effective financial and non-financial controls to ensure the identification, monitoring, and mitigation of fraud and corruption risks.

Furthermore, Romgaz conducted a corruption vulnerability assessment for each operation. An operation is considered an organizational unit within Romgaz, as defined by the Organization and Functioning Regulation, and may include branches, divisions, departments, centers, offices, services, teams, workshops, sections, agencies, and storage facilities, according to internal organizational documents and decisions. The assessment covered 100% of Romgaz's organizational units. At the Company level, the system procedure "Inventory of Sensitive Functions" is applied. Following the analysis, out of 134 activities, 20 activities representing 14.92% were identified as having a corruption risk. The assessment highlighted several risks, with high-risk areas including: procurement, investment, human resources, information technology and telecommunications, financial, legal, drilling, exploration, production, land formalities and commercial operations.

Regarding the independence of investigators or the Inquiry Committee from the management chain involved, the Disciplinary Investigation Committee is appointed by decision of the CEO and consists of 3-5 members, including a Chairperson and a Secretary. To ensure the objectivity of the process, disciplinary investigations are conducted crosswise between branches and headquarters, avoiding the direct involvement of individuals from organizational structures that may have connections to the case under review. Additionally, the committee includes a legal advisor and a union representative as observers to help ensure the impartiality of the investigations.

The Disciplinary Investigation Committee's report is submitted to the CEO, who decides whether to approve it. The report is then forwarded to the Anti-Fraud and Ethics Department or the Ethics Advisor, who is responsible for drafting the decision to establish the committee. In cases involving conflicts of interest, the Ethics Advisor informs the CEO and proposes forming a mixed committee, including representatives from legal services, human resources, the Ethics



Advisor, and the affected organizational unit, to assess the impact and propose corrective measures.

In 2024, Romgaz adopted the [Integrity Plan of S.N.G.N. Romgaz S.A.](#), with the general objective of preventing corruption and integrity-related incidents. The plan includes four specific objectives, with 18 actions identified for their implementation, along with associated risks, responsible parties, deadlines, performance indicators, and budget allocations.

To support this, Romgaz launched an internal campaign to prevent, inform and raise employees' awareness of the importance of combating any corruption that may occur within the Company. Thus, the "International Anti-Corruption Day" was organized, aiming to promote ethical principles, integrity, transparency and accountability within Romgaz. The information material on "Fraud and Corruption", as well as the booklet on Understanding and Prevention of Fraud, has been promoted internally with the support of the Communication Service. In December 2024, these materials were e-mailed to all employees.

Within the informational material, various perspectives on defining corruption were described, aspects regarding the applicable legislation were mentioned, as well as the forms, causes, and effects of the corruption phenomenon, accompanied by practical examples. Additionally, measures for preventing and combating corruption were presented.

Also, in accordance with the Integrity Plan, Romgaz conducts information and professional training sessions on anti-corruption, specifically targeting personnel involved in high-corruption-risk areas. These sessions, carried out by ethics advisors, cover topics such as anti-corruption, bribery, gifts and invitations, as well as conflicts of interest. The provisions of the Code of Ethics and Business Conduct (Section III.2 Anti-Corruption and Anti-Fraud) are reiterated during these sessions to emphasize the importance of business ethics.

All employees in leadership positions, according to the organizational charts valid as of 31.12.2024 (582 employees), have been informed of the fundamental principles and values of the National Anti-Corruption Strategy (SNA). In turn, employees in leadership positions, in accordance with the internal regulations in force, are required to train their subordinates on the provisions of the SNA and the System Procedure "Inventory of Sensitive Functions."

Throughout 2024, Romgaz developed an informational material for the personnel involved in public procurement activities, which was distributed via e-email to all employees (100%) within the Procurement Department.

### **Depogaz**

Within Depogaz, the Ethics Advisor trained a sample of employees consisting of the heads of organizational units, according to the organizational chart, as well as employees in executive positions, totaling 170 people, representing 33% of the total number of Depogaz employees. Another 29 employees, representing 5.6% of the total number of Depogaz employees, also attended professional development courses on "Ethics and Organizational Integrity" and "Aspects regarding Integrity, Decisional Transparency and Access to Information" provided by external trainers.

To manage and reduce the likelihood of identified risks, ROMGAZ GROUP implements measures to increase awareness of anti-corruption policies and procedures, as outlined in the following table.



2024		
Indicator		%
The number and percentage of members of the Board of Directors who were informed about the anti-corruption policies and procedures of the Company	All, by publishing the following documents on Depogaz's website: <ul style="list-style-type: none"> <li>The Declaration regarding the assumption of an organizational integrity agenda for the 2022-2025 period adopted by SNGN Romgaz SA - Natural Gas Storage Subsidiary DEPOGAZ Ploiești SRL, registration no. 3332/23.03.2022;</li> <li>SNGN Romgaz SA - FÎGN DEPOGAZ Ploiești Srl 2022-2025, approved by Decision of General Director No. 162/14 June 2022;</li> <li>The Integrity Plan adopted at the level of SNGN Romgaz SA - Natural Gas Storage Subsidiary Depogaz Ploiești SRL in application of the National Anti-Corruption Strategy 2021-2025, approved by Decision of the General Director no. 104/14.06.2024;</li> <li>The Code of Ethics and Integrity of SNGN Romgaz SA-Filiala de Filing Gaz Depogaz Ploiești SRL, no. Not applicable. 5968/8 May 2023.</li> </ul>	100
The number and percentage of employees who have received anti-corruption training	All Romgaz employees in management positions, according to the valid organizational charts valid as of 31.12.2024 (approximately 582 employees), were informed about the fundamental principles and values of the National Anti-corruption Strategy (SNA) as part of the methodological guidance for SCIM development. Efforts were made to raise employees' awareness of detecting, combating, and reducing corruption, correlating the SNA with standards 1 and 2 of OSGG 600/2018. For their part, the management employees, according to internal regulations in force, have the obligation to train their subordinates regarding the provisions of the SNA and the System Procedure "Inventory of Sensitive Positions". Depogaz 170 internal - trained by the Ethics Adviser, 29 trained externally too. RBS - 12 employees	10.67 Romgaz 33.00 Depogaz 100 RBS
The number and percentage of employees who have been informed of anti-corruption policy and procedures	5,450 Romgaz 515 Depogaz 12 RBS	100
The number and percentage of business partners who have been informed of anti-corruption policy and procedures	All ROMGAZ, by publishing the Ethics and Integrity Code and the Declaration of Accession of Romgaz to the SNA 2021-2025 on the website <a href="http://www.romgaz.ro">www.romgaz.ro</a> All Depogaz, by publishing on the Depogaz website ( <a href="http://www.depogazploiesti.ro">www.depogazploiesti.ro</a> ) the following documents: <ul style="list-style-type: none"> <li>The Declaration regarding the assumption of an organizational integrity agenda for the 2022-2025 period adopted by SNGN Romgaz SA - Natural Gas Storage Subsidiary Depogaz Ploiești SRL, registration no. 3332/23.03.2022;</li> <li>The Integrity Plan of SNGN Romgaz SA - FÎGN Depogaz Ploiești SRL 2022-2025, approved by Decision of the General Director no. 162/14.06.2022;</li> <li>The Integrity Plan adopted at the level of SNGN Romgaz SA - Natural Gas Storage Subsidiary Depogaz Ploiești SRL in application of the National Anti-Corruption Strategy 2021-2025, approved by Decision of the General Director no. 104/14.06.2024;</li> <li>The Code of Ethics and Integrity of SNGN Romgaz SA - Natural Gas Storage Subsidiary Depogaz Ploiești SRL, no. 5968/08.05.2023.</li> </ul>	100

### 9.3 Metrics and targets

#### 9.3.1 G1-4: Confirmed incidents of corruption or bribery

During the reporting period, no acts of corruption or fraud were identified, and no fines related to this issue were paid.

No specific actions were required to address violations of procedures and standards related to the fight against corruption and bribery during this period. To prevent such incidents, the company implemented additional measures, including employee training sessions and periodic internal audits.

During the reporting period, no cases of bribery or corruption were recorded.

There were no confirmed incidents where employees were dismissed or subject to disciplinary procedures for corruption or bribery incidents.

There were no confirmed incidents related to contracts with business partners that were terminated or not renewed due to corruption or bribery violations.

No public cases of corruption or bribery were reported against the company and its employees during the reporting period.

No incidents of corruption or bribery involving actors in our value chain were reported, where the organization or its employees were directly involved.

Total number and nature of confirmed incidents of corruption or bribery	0
Number of confirmed incidents in which own workers were made redundant or were subject to disciplinary proceedings for corruption incidents or incidents relating to giving or taking of bribes	0
Number of confirmed incidents relating to contracts with business partners that have been terminated or not renewed due to breaches of corruption or bribery policies	0



**Annex No.2 Table on compliance with BVB (Bucharest Stock Exchange) Code of Corporate Governance**

BVB CCG Provisions		Compliance	Non-compliance /partial compliance	Reason for non-compliance/ Explanation on compliance
1		2	3	4
A.1	All companies should have in place a set of Internal Rules of the Board of Directors that provides terms of reference / responsibilities of the Board and the company's key management positions, and which apply, among others, the General Principles in section A.	x		
A.2	The BoD Regulation shall include provisions for the management of conflict of interest. The members of the Board should notify the Board on any conflicts of interest which have arisen or may arise, and should refrain from taking part in the discussion (including by absence, except where such absence prevents quorum to be attained) and from voting on the adoption of a resolution on the issue which gives rise to such a conflict of interest.	x		
A.3	The BoD consists of at least five members.	x		
A.4	The majority of BoD members should be non-executive. The number of independent non-executive BoD members shall not be less than two.  Each independent BoD member shall submit a statement upon his/her nomination for election or re-election, as well as whenever a change in his/her status occurs, indicating the elements on which he/she is deemed independent in terms of his/her character and his/her judgment.	x		
A.5	Other rather permanent professional commitments and engagements of BoD members, including executive and non-executive Board positions in companies and non-profit organizations, shall be disclosed to shareholders and potential investors prior to his/her nomination and during his/her mandate.	x		
A.6	Any BoD member shall submit to the Board information on any relationship with a shareholder who, directly or indirectly, holds shares representing more than 5% of all voting rights. This also applies to any relationship, which may affect the member's position on matters decided by the Board.	x		
A.7	The company shall appoint a Board secretary responsible for supporting the work of the Board.	x		
A.8	The Corporate Governance Statement shall inform on whether an evaluation of the Board has taken place under the leadership of the chairperson or the nomination committee and, if so, it shall summarize key actions and changes resulting from it.  The company should have a policy/guideline on	x		

<b>BVB CCG Provisions</b>		<b>Compliance</b>	<b>Non-compliance /partial compliance</b>	<b>Reason for non-compliance/ Explanation on compliance</b>
<b>1</b>		<b>2</b>	<b>3</b>	<b>4</b>
	<i>the BoD evaluation, containing the purpose, criteria and frequency of the evaluation process.</i>			
A.9	<i>The Corporate Governance Statement shall contain information on the number of meetings of the Board and the committees during the past year, attendance by directors (personally and in their absence) and a report of the Board and committees on their activities.</i>	x		
A.10	<i>The Corporate Governance Statement shall contain information on the precise number of independent members of the Board of Directors.</i>	x		
A.11	<i>The BoD shall set up a nomination committee comprised of non-executive members, which will lead the nomination process for new Board members and will make recommendations to the Board.</i>  <i>Most of the members of the nomination committee shall be independent.</i>	x		
B.1	<i>The Board shall set up an Audit Committee where at least one member should be an independent non-executive member.</i>  <i>The Audit Committee shall consist of at least three members and the majority shall be independent.</i>  <i>Most of the members, including the chairperson, shall have proven an adequate qualification relevant to the functions and responsibilities of the Committee. At least one member of the Audit Committee shall have a proven and appropriate auditing and/or accounting experience.</i>	x		
B.2	<i>The Chairperson of the Audit Committee shall be an independent non-executive member.</i>	x		
B.3	<i>Among its responsibilities, the Audit Committee shall perform an annual assessment of the internal control system.</i>	x		
B.4	<i>The assessment in section B.3 shall take into consideration the effectiveness and scope of the internal audit function, the adequacy of risk management and internal control reports submitted to the BoD Audit Committee, the promptness and effectiveness with which the executive management addresses deficiencies and weaknesses identified during the internal control and submission of relevant reports to the Board.</i>	x		

<i>BVB CCG Provisions</i>		<i>Compliance</i>	<i>Non-compliance /partial compliance</i>	<i>Reason for non-compliance/ Explanation on compliance</i>
<i>1</i>		<i>2</i>	<i>3</i>	<i>4</i>
<i>B.5</i>	<i>The Audit Committee shall review conflicts of interests in connection with the transactions of the company and its branches with affiliated parties.</i>		<i>x partial</i>	<i>This provision is already mentioned at Article 8, paragraph 2 of Romgaz CCG.  the Internal Rules of the Audit Committee approved by the BoD in the meeting of May 14, 2018, revised and approved on October 10, 2022 includes provisions on such obligation.  Moreover, a Policy on affiliated party transactions was drafted by Romgaz and approved by the BoD on March 20, 2019. Following approval, it was published on company website.</i>
<i>B.6</i>	<i>The Audit Committee shall evaluate the effectiveness of the internal control system and risk management system.</i>	<i>x</i>		
<i>B.7</i>	<i>The Audit Committee shall monitor the application of legal and generally accepted standards of internal auditing. The Audit Committee shall receive and evaluate the reports of the audit team.</i>	<i>x</i>		
<i>B.8</i>	<i>The Audit Committee shall report periodically (at least annually) or ad hoc to the BoD on the reports or analyses initiated by the committee.</i>	<i>x</i>		
<i>B.9</i>	<i>No shareholder may be given preferential treatment over other shareholders regarding transactions and agreements concluded by the company with shareholders and their affiliates.</i>	<i>x</i>		
<i>B.10</i>	<i>The BoD shall adopt a policy ensuring that any transaction of the company with any of the companies it has a close relationship amounting to at least 5% of the company's net assets (as stated in the latest financial report) is approved by the Board, based on a mandatory opinion of the Audit Committee, and it is fairly disclosed to the shareholders and potential investors, to the extent such transactions represent events which are subject to reporting requirements.</i>	<i>x</i>		
<i>B.11</i>	<i>The internal audits shall be carried out by a separate structural division (internal audit department) within the company or by hiring an independent third-party entity.</i>	<i>x</i>		



<b>BVB CCG Provisions</b>		<b>Compliance</b>	<b>Non-compliance /partial compliance</b>	<b>Reason for non-compliance/ Explanation on compliance</b>
<b>1</b>		<b>2</b>	<b>3</b>	<b>4</b>
B.12	<p><i>The Internal Audit Department shall functionally report to the BoD via the Audit Committee. For administrative purposes and as part of the management obligations to monitor and mitigate risks, the Internal Audit Department shall report directly to the CEO.</i></p>	x		
C.1	<p><i>The company shall publish the Remuneration Policy on its website. The Remuneration Policy should be formulated to allow the shareholders to understand the principles and arguments underlying the remuneration of the BoD members and the CEO. Any significant change occurred in the Remuneration Policy shall be published, in due time, on company website.</i></p> <p><i>The company shall include in its Annual Report a statement on the implementation of the Remuneration Policy during the annual period under review.</i></p> <p><i>The Report on Remuneration shall present the implementation of the Remuneration Policy for persons identified in such Policy during the annual period under review.</i></p>	x		
D.1	<p><i>The company shall establish an Investors Relation Department - informing the public on the responsible person/persons or the organizational unit.</i></p> <p><i>Besides the information required by the legal provisions, the company shall also include on its website a dedicated Investor Relations section, both in Romanian and English, with all the relevant information of interest for investors, including:</i></p>	x		
D.1.1	<i>Main corporate regulations: the Articles of Incorporation, procedures on general meeting of shareholders;</i>	x		
D.1.2	<i>Professional CVs of members of company governing bodies, other professional commitments of BoD members, including executive and non-executive Board positions in companies and non-profit organizations;</i>	x		
D.1.3	<i>Current reports and periodic reports (quarterly, half-year and annual reports) - at least those specified at item D.8 - including current reports with detailed information on non-compliance with Bucharest Stock Exchange Code of Corporate Governance;</i>	x		
D.1.4	<i>Information related to GMS: the agenda and supporting materials; the Board of Directors election procedure; the arguments in support of the proposal of candidates to the Board of Directors together with their professional CVs;</i>	x		

<b>BVB CCG Provisions</b>		<b>Compliance</b>	<b>Non-compliance /partial compliance</b>	<b>Reason for non-compliance/ Explanation on compliance</b>
<b>1</b>		<b>2</b>	<b>3</b>	<b>4</b>
	<i>shareholders' questions related to the agenda and the answers of the company, including decisions taken;</i>			
D.1.5	<i>Information on corporate events (such as payment of dividends and other distributions to shareholders, other events leading to the acquisition or limitation of rights of a shareholder) including deadlines and principles applicable to such operations.  Such information shall be published in due time to allow investors to take investment decisions;</i>	x		
D.1.6	<i>The name and contact data of the person who can provide knowledgeable information upon request;</i>	x		
D.1.7	<i>Corporate presentations (e.g. presentations for investors, presentations on quarterly results, etc.), financial statements (quarterly, half-year, annual), audit reports and annual reports.</i>	x		
D.2	<i>The company shall have a policy for the annual distribution of dividends or other benefits to shareholders, proposed by the CEO and adopted by the BoD as guidelines on net profit distribution. The principles of the annual policy of distribution to shareholders shall be published on company website.</i>	x		
D.3	<i>The company shall adopt a policy with respect to forecasts, whether they are made public or not. The Policy on forecasts shall determine the frequency, period and content of the forecasts and shall be published on company website.</i>	x		
D.4	<i>GMS rules should not restrict the participation of shareholders in general meetings and should not limit the exercise of their rights. Changes in the rules shall become effective no sooner than the next shareholders meeting.</i>	x		
D.5	<i>The external auditors shall attend those shareholders meetings where their reports are presented.</i>	x		
D.6	<i>The BoD shall submit to the GMS a brief assessment of the internal control and significant risk management systems, as well as opinions on matters to be submitted to the GMS for decision.</i>	x		
D.7	<i>Any professional, consultant, expert or financial analyst may participate in the shareholders meeting upon prior invitation from the BoD. Accredited journalists may also attend the GMS, unless the Chairperson of the Board decides otherwise.</i>	x		



<i>BVB CCG Provisions</i>		<i>Compliance</i>	<i>Non-compliance /partial compliance</i>	<i>Reason for non-compliance/ Explanation on compliance</i>
<i>1</i>		<i>2</i>	<i>3</i>	<i>4</i>
<i>D.8</i>	<i>The quarterly and half-year financial reports shall include information, in the Romanian and English languages, on the key drivers influencing the change in sales, operating profit, net profit and other relevant financial indicators, from one quarter to the next as well as from year to another.</i>	x		
<i>D.9</i>	<i>The company shall organize meetings/conference calls with analysts and investors at least twice a year. Information presented on such occasions shall be published on company website in the Investors Relation section at the date of the meetings/conference calls.</i>	x		
<i>D.10</i>	<i>If the company supports various forms of artistic and cultural expression, sport activities, educational or scientific activities, and considers that their impact on the innovativeness and competitiveness of the company is part of its business mission and development strategy, the company shall publish the policy concerning its activity in such field.</i>	x		

**Abbreviations:**

*GMS = General Meeting of Shareholders*

*BVB = Bucharest Stock Exchange*

*BoD = Board of Directors*

*CCG = Code of Corporate Governance*

*ROMGAZ CCG = Code of Corporate Governance of S.N.G.N. ROMGAZ S.A., as approved on January 28, 2016*

*CV = Curriculum Vitae*

*ToR = Terms of Reference*