Rompetrol Rafinare S.A. and affiliated entities

2025 Consolidated Sustainability Statement

ROMPETROL RAFINARE SA
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GENERAL INFORMATION

1 GENERAL INFORMATION PRESENTATIONS

1.1 Basis for Preparation

1.1.1 General basis for preparation of the sustainability statement

BP-1

The Rompetrol Rafinare Group consists of Rompetrol Rafinare S.A and its subsidiaries: Rompetrol Downstream SRL, Rompetrol Quality Control SRL, Rompetrol Gas SRL, Rompetrol Logistics SRL, Rom Oil SA, Rompetrol Petrochemicals SRL (operational activities have been taken over and integrated into Rompetrol Rafinare, while Rompetrol Petrochemicals continues to exist solely as a legal entity).

This Consolidated Sustainability Statement for the **fiscal year 2025** has been prepared based on the requirements of Section 7^1.3 of OMF no. 2844/2016, which approves the Accounting Regulations in accordance with the 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 set out in Annex 1 to Delegated Regulation (EU) 2023/2772 of 31 July 2023, supplementing Directive 2013/34/EU of the European Parliament and of the Council, being transposed into local legislation by OMF no. 85/2024. The report also includes the information provided for in Article 8 of the EU Taxonomy Regulation 2020/852. In 2025, Rompetrol enters its second year of reporting in accordance with CSRD and ESRS requirements, also taking into account Delegated Regulation (EU) 2025/1416 ("Quick Fix"). This statement presents the activity data of the **Rompetrol Rafinare SA and its subsidiaries (hereinafter "Rompetrol" /"Group")** for the period 01.01.2025 – 31.12.2025, in accordance with the period used for financial reporting. Reporting is not limited to companies' own operations, as information from the upstream and downstream value chain is also included.

Rompetrol Rafinare S.A. and its subsidiaries are members of the group KMG International.

The double materiality assessment analysis, conducted in 2024 and validated in 2025, includes the analysis of the impacts related to its own operations and the value chain of Rompetrol, including its products and services, as well as its direct business relationships. Within each chapter, the specific presentation requirements are addressed for each topic that resulted as material, respectively the relevant impact, risks and opportunities are identified. Once an impact, risk or opportunity has been identified as material, the relevant information to be considered for reporting under the ESRS is identified. Information about the value chain (customers and suppliers of the company) is mentioned in the chapters dedicated to the topical standards.

The scope of the Statement covers Rompetrol Rafinare SA and its subsidiaries aligned to the consolidated financial statements prepared in accordance with the International Financial Reporting Standards, as adopted by the European Union.

Rompetrol did not omit information corresponding to intellectual property, know-how or innovation results. During the preparation of this Statement, the option to omit any applicable specific piece of information corresponding to intellectual property, know-how or the results of innovation in accordance with ESRS 1 section 7.7 has not been used.

The Consolidated Sustainability Statement for FY 2024 has also been prepared and audited in accordance with the requirements of the CSRD and the applicable ESRS standards, while the report for the baseline used FY 2022 — was prepared and independently assured in line with the GRI Standards (exception Scope 3 – 2024 restated shall be considered as base year). All baseline figures were considered for comparability in line with the ESRS requirements.

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1.1.2 Disclosures in relation to specific circumstances

BP-2

1.1.2.1 Time horizons

We define our medium-term horizon as 2-5 years and our long-term horizon as over 5 years.

1.1.2.2 Sources of estimation and outcome uncertainty

Regarding the sources of each of the estimates used and outcome uncertainty, if applicable, we disclosed the sources contributing to such uncertainty for each quantitative metric and monetary amount. Furthermore, we defined the assumptions and judgments made in measuring the estimation sources and outcome uncertainty. We disclosed information about the sources of measurement uncertainty for each applicable quantitative metric and monetary amount. We also presented the assumptions and judgments in measuring each quantitative metric and monetary amount.

1.1.2.3 Disclosures stemming from other generally accepted sustainability reporting standards

In addition to the mandatory disclosures required under the European Sustainability Reporting Standards (ESRS), the Group has selectively incorporated limited supplementary information derived from other internationally recognised sustainability reporting and industry standards, strictly where such information was assessed as material, decision-useful and directly relevant to the nature of our operations.

In this context, reference has been made to GRI 11: Oil and Gas Sector 2021 (effective as of 1 January 2023), the IPIECA 2020 voluntary guidance for the oil and gas industry, and selected guidance issued by the International Association of Oil & Gas Producers (IOGP), primarily to support the identification, assessment and contextualisation of sector-specific impacts, risks and opportunities, as well as to reflect established industry practices in areas such as environmental performance, safety and operational integrity.

Any such supplementary information is clearly identified as additional to the ESRS requirements and does not replace or override mandatory ESRS disclosures. It has been included in a manner consistent with the qualitative characteristics set out in ESRS 1, paragraph 114, including relevance, faithful representation, comparability and verifiability, and only where it enhances the understanding of material sustainability matters for users of the report. The ESRS framework remains the primary and authoritative basis for the Group's sustainability reporting.

Reporting errors in prior periods

The group restated the following data points presented in the table. The respective changes and the reasons for them, as well as the restated comparative figures and the difference between the previous reporting period and the restated comparative figures, are reported in the topical subchapters ESRS 2 GOV-1, S1 -6, S1- 16, E1- 5 , E1-6, E1- Scope 3, E3-4

ESRS disclosure requirement	Disclosure	Description
ESRS- 2 Gov1	Gender diversity	According to the standard, the board's gender diversity is calculated as an average ratio of female to male board members. Last year, the indicator was computed as an average ratio of female to total number of Board members.
S1-6	S1- Characteristics of own workforce	The calculation previously considered the number of men and women in 2024 in two tables referring to number of employees (headcount), number of permanent and number of temporary employees and the second table referring to number of employees by contract and by gender
S1-16	Unadjusted gender pay gap	The 2024 calculation for gender pay gap was based on gross salaries and did not include all categories of compensation (such as bonuses, benefits in cash and kind, and long-term incentives) as required by ESRS.

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ESRS disclosure requirement	Disclosure	Description
E1-Scope 3	Scope 3	In 2024, downstream emissions (Cat. 11) for quantities sold to related parties outside Rompetrol Rafinare's consolidation were omitted, and upstream emissions (Cat. 1) for quantities purchased from Petromidia to Vega were included although they should have been eliminated since they are intercompany transactions.
E1-6	GHG Emissions intensity	In 2024, the ratio of GHG emissions intensity was calculated inversely, with net revenue used as the numerator and GHG emissions as the denominator in kilotons and not tons. The intensity also changed due to the Scope 3 error mentioned above.
E3-4	Water intensity	In 2024, the water consumption intensity was computed only for the refineries Petromidia and Vega. The indicator should have been calculated at consolidated level, using total water consumption for all entities divided by consolidated net revenue.

1.2 Company, business model and stakeholder engagement

1.2.1 Information on the market position and strategy of the company

SBM-1

Rompetrol's consolidated reporting includes the following companies: Rompetrol Rafinare SA, Rompetrol Downstream SRL, Rompetrol Quality Control SRL, Rompetrol Gas SRL, Rompetrol Logistics SRL, Rom Oil SA, and Rompetrol Petrochemicals SRL (shell company, whose operations are integrated within Rompetrol Rafinare SA, specifically Petromidia refinery).

Rompetrol Rafinare SA actively carries out refining, petrochemical production, trading, transport activities and all its production facilities are located in Romania, mainly through two refineries: Petromidia and Vega.

The Petromidia refinery, located on the Black Sea coast, processes imported crude oil and produces fuels that meet European Union standards, other petroleum products and some petrochemical products. The Vega refinery is located in Ploiesti and is one of the oldest refineries in Romania. The Vega Refinery is a niche refinery specialized in the production of solvents, hexane and bitumen.

Internationally, sales were distributed between the European Community (EC) and non-European Community areas; the main international destinations for Rompetrol Rafinare's products included Gibraltar, Georgia, Moldova, Turkey, Lebanon, Italy, Serbia and Albania for gasoline; Moldova, Bulgaria, Georgia, Serbia, Greece and Turkey for diesel; Georgia, Moldova, Bulgaria, Hungary and Lebanon for jet fuel; Turkey, Moldova and Egypt for petroleum coke; Morrocco, Egypt and Lebanon for sulphur; Hungary for carbon black feedstock; Gibraltar for raffinate; and France and Spain for naphtha.

Key external markets for polymers included Romania, Bulgaria, Italy, and the Republic of Serbia.

Rompetrol Rafinare's Petrochemicals division exhibited a balanced distribution between domestic sales and exports, with 56% of its total sales catered to the domestic Romanian market and 44% directed towards international markets. A notable trend is reflected by the current needs of the medical sector that created the context for our specialists to innovate and produce a special type of polypropylene dedicated to protective medical masks.

Rompetrol entities are registered and operate on the territorial **geographical area of Romania,** and at the end of 2025 they had a total number of 1,859 employees. Regarding the distribution of employees on the territory of Romania, on 31.12.2025, the following aspects can be noted:

- 7% of employees are allocated to headquarters (Bucharest).
- 72% are at the industrial platforms Vega (Ploiesti) and Petromidia (Navodari)
- 14% work at warehouses and fuel-stations across the country
- 7% offer other services across the country.

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In 2025 we did not experience changes with regards to new/removed markets and/or changes customer groups.

Rompetrol Downstream operated a total of 1,217 retail points, comprising company-owned stations, partner stations, and mobile stations (including Express units and loading points at clients' premises).

More detailed information on the financial performance of Rompetrol Downstream is available in the Rompetrol Rafinare consolidated financial statements, published on the company's website.

Strategy - Key elements of our general strategy that relate to or affect sustainability matters.

The European Commission presented on December 11, 2019, the "European Green Deal", the most ambitious package of measures containing actions aimed at encouraging the efficient use of resources by moving to a clean circular economy and managing climate change, to reverse the decline of biodiversity and reduce pollution. This Deal accelerates the achievement of the objectives established by the Paris Treaty on decarbonization.

As the oil and gas sector is subject to increased scrutiny due to its climate impact, the Group has adjusted its strategy to reflect an enhanced approach to climate-related challenges, with the objective of supporting long-term business resilience and sustainability. In this context, the Group has assessed its strategy from the perspective of future value creation and has defined a set of decarbonisation measures aimed at the gradual adaptation and enhancement of its product portfolio.

The implementation of these measures may entail changes in capital allocation, operational expenditure and asset utilisation over time. Where relevant, such aspects are considered in the Group's financial planning and investment decision-making processes and are reflected, as applicable, in the financial statements in accordance with the relevant accounting standards.

At the reporting date, no material immediate impacts on the Group's financial statements have been identified as a direct result of the decarbonisation measures described; however, potential medium- to long-term financial implications are monitored as part of the Group's climate risk and opportunity assessment. The actions related to the key elements of the Group's strategy, together with the sustainability-related decarbonisation targets, are presented in section E1 – Climate Change of this report.

Other strategic targets are an integral part of our ESG related policies as presented in material topics chapters in this report. Rompetrol Rafinare SA management teams oversee the setting of targets related to material impacts, risks and opportunities and monitor the progress towards these targets for all Rompetrol entities. There are no established additional sustainability-related goals in terms of significant groups of products and services, customer categories, geographical areas and relationships with stakeholders.

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1.2.2 Description of business model(s) and value chain

SBM 1

We engage with internal and external stakeholders, including experts, to gather a wide range of perspectives and insights relevant from a sustainability point of view to our business.

To gather, develop and secure the inputs for our business, we regularly engage with four broad stakeholder groups relevant to our activities: regulatory authorities, market actors, industry peers, and society. Our stakeholders include individuals or groups significantly impacted by our operations, those with a vested interest in our sustainability or environmental, social, and governance (ESG) performance, and public figures who influence our activities.

Below we provide the total Rompetrol consolidated revenue derived from our financial statements.

- Total revenue: 4,404,155,168 USD (net, consolidated RRC & affiliates)
- Revenue from significant ESRS sectors, as follows: 4,404,155,168 USD (net, including refining, petrochemicals, marketing and distribution, with the consolidation adjustments)
- Revenue from fossil fuels: 4,404,155,168 USD (net, consolidated RRC & affiliates, including refining, petrochemicals, marketing and distribution of oil products)
- Revenue from coal: 0 USD
- Revenue from oil (including condensate):0 USD
- Revenue from natural gas: 0
- Revenue from EU Taxonomy-aligned economic activities related to fossil gas:0
- Revenue from chemical products: 95,273,250 USD (net, petrochemicals sector, out of the total net revenue presented above)
- Revenue from controversial weapons: 0 USD
- Revenue from tobacco cultivation and production: 0 USD

Also, Rompetrol generated no revenue aligned with the EU Taxonomy requirements, as defined under Article 8(7)(a) of Commission Delegated Regulation (EU) 2021/2178.

During the reporting period, the Group's revenue-generating activities were primarily related to the fossil fuel value chain, including crude oil refining and the production of petroleum-based products, as well as chemical and petrochemical activities. These economic activities are either not covered by the EU Taxonomy eligibility criteria or do not meet the technical screening criteria for Taxonomy alignment applicable for the reporting period.

Description of business model(s) and value chain

According to ESRS Annex II (Table 2. Terms defined in the ESRS), the value chain includes all activities, resources, and relationships related to a company's business model and its external environment. This encompasses everything from the initial concept to delivery, consumption, and the end-of-life stage of products or services.

Rompetrol's business relies on several key activities within its value chain, including the extraction of raw materials (Rompetrol Rafinare's processed crude originates from Kazakhstan and in a limited proportion from the international markets), the processing of raw materials, as well as related activities and services such as transport. The upstream value chain involves supply of goods and services, including both national and international operators that provide essential products and equipment for our operations. The downstream value chain consists of transporters and business customers, respectively consumers and end users of our products. The table shows the schematic upstream/downstream value chain for Rompetrol.

UPSTREAM				OWN OPERATIONS		DOWNSTREAM	
Raw Material Extraction	**Processing of raw materials**	**Transport of goods and raw materials**	**Services contracted**	**Crude processing/ Refining activities**	**Transport**	**Transport & processing of products**	**End use of products – distribution through a network of stations**

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The main features in our upstream and downstream value chain and our position in the value chain are of strategic importance to Rompetrol. We are dependent on imported crude oil and all the extensive logistics alongside it, while also relying on a complex export system to send our products to customers (businesses or individual consumers). There are also several key entities in our value chain which contribute to our performance and position, and these are included in the below points.

As such, as part of our upstream value chain the following are included:

- The import of mainly Kazakh **crude oil,** from the Tengiz and Kashagan oilfields,
- The reliance on the **Midia Marine Terminal** (MMT), part of KMG International, to safely unload the crude oil imports destined for the Petromidia Refinery; MMT has in its portfolio all the facilities related to the Petromidia platform logistics. Through a pipeline system of over 10,000 meters (8,600 meters underwater and 1,500 meters on land), the crude oil is transferred directly to the 390,000 m3 capacity tank farm, also operated by Midia Marine Terminal.

In the downstream side of our value chain:

- **Rompetrol's partnerships** with independent filling stations all over Romania to develop the Rompetrol Partner Network that ensure the fuel distribution flow countrywide, for our customers and
- KMGI entities: **Rompetrol Georgia, Rompetrol Moldova, Rompetrol Bulgaria** for storage and distribution at fuel stations outside Romania.

1.2.3 Interests and views of stakeholders

Our key stakeholders encompass employees, clients, public authorities, regulatory authorities, shareholders, business partners, media, suppliers, trade unions, local communities, NGOs and financial institutions. The purpose of engaging with our stakeholders is to understand the material effects of their interests and points of view (applicable to Rompetrol Rafinare and affiliated – Rompetrol Downstream and the other entities), so that they can be accurately reflected in our reporting, but also inform our business decisions.

We engage with them for our materiality assessment during consultations as well as within our day-to-day business activities in various capacities including as follows:

Stakeholder group	Engagement channel
Employees	Regularly, virtually and physically through internal systems or on-site
Clients	In-person visits or via online channels
Public authorities	Whenever the occasion arises for permits or other issues, in-person visits or via online channels
Regulatory authorities	Whenever the occasion arises for permits or other issues, in-person visits or via online channels
Shareholders	Regularly, virtually and physically on-site
Business partners	Regularly, virtually or in-person visits
Media	Occasionally, virtually via online channels
Suppliers	Regularly, virtually and physically through internal systems or on-site
Trade unions	Occasionally, virtually via online channels or on-site
Local communities	Whenever the occasion arises for permits or other issues, in-person visits or via online channels
NGOs	Whenever the occasion arises, in-person visits or via online channels, common community development projects
Financial institutions	Whenever the occasion arises for loans, investments or other issues, in-person visits or via online channels

We factor in the outcomes of our stakeholder engagement by including the results of the double materiality analysis in the sustainability report. We understand the interests and perspectives of our key

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stakeholders concerning our strategy and business model as more impactful in certain areas than others (i.e. climate change), hence we make efforts to integrate all perspectives into our strategies.

Our administrative, management, and supervisory bodies are informed about the views and interests of affected stakeholders concerning our sustainability-related impacts through the double materiality workshop and by approving the results stemming from this as well and regularly updates on this part.

1.3 Governance and business practices

1.3.1 The role of the administrative, management and supervisory bodies

GOV-1

Rompetrol Rafinare SA is administered in a unitary system by a Board of Directors and is constituted in accordance with the provisions of the Articles of Incorporation of the Company. Its composition, organization, attributions and responsibilities are established by the Company's Constitutive Act that could be consulted at the following link: https://rompetrol-rafinare.kmginternational.com/.

The Directors are elected by the Ordinary General Meeting of Shareholders, at the proposal of the Board of Directors or the shareholders, and currently all members are non-executive ones. The Board of Directors consists of 7 members who elect from among themselves the Chairman of the Board (the year concluded with six members serving on the Board of Directors, with the seventh member expected to be appointed in 2026). The Chairman coordinates the work of the Board and report thereon to the General Meeting of Shareholders. The Chairman supervises the good functioning of the Board, convene it, establish the agenda of the meetings, ensure that the members of the Board are properly informed of the items on the agenda and chair the meetings of the Board.

The administrative, management and supervisory bodies have oversight responsibilities for sustainability-related impacts, risks and opportunities, ensuring that these are appropriately identified, assessed and managed. The bodies oversee the decarbonisation objectives into the Company's strategy to support long-term value creation and business resilience. Progress against sustainability-related targets (safety, environmental etc.) is monitored through regular reporting from management, covering performance, implementation of action plans and corrective measures where necessary, thereby ensuring effective governance, accountability and continuous improvement in business performance.

The members of the Board of Directors (as of December 31, 2025) possess experience relevant to the sectors, products and geographic locations of the undertaking as follows:

Yedil Utekov - Chairman of the Board of Directors

Appointed starting with 01.02.2025. Mr. Utekov has 25 years of experience in the oil and gas industry, managing operational activities of several production units, including refineries, power generation and petrochemical plants. Mr. Yedil Utekov held important roles within the KMG International Group, including General Manager of Rompetrol Rafinare, Managing Director of Refining and Petrochemicals or Director of Production Block and Industrial Services.

Adrian Tohănean – Member of the Board of Directors

Experience in Business Administration, Budget & Reporting, Planning & Performance Management, Financial Management.

Nazar Mukhametkali – Member of the Board of Directors

Appointed on 25.11.2025. Mr. Mukhametkali has 18 years of professional experience in areas of corporate communication, digitalization, employee safety, and workplace environment improvement, coordination, analysis, and project management.

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Bogdan Cătălin Steriopol - Member of the Board of Directors

Experience in marketing, media, communication, and the energy sector. Currently is the representative of the Ministry of Energy in the Board of Directors of Rompetrol Rafinare SA.

Tamila Mikulich - Member of the Board of Directors

Experience in business productivity improvement, business analysis, human resource management and brand management in various companies including KazakhstanTemirZholy, Ernst & Young, KazMunayGas, Samruk Kazyna - National Fund of Kazakhstan. Holds a CIPD certificate (Chartered Institute of Personnel and Development) from the Bradfield Group, Dubai.

Constantin Saragea - Member of the Board of Directors

Experience in quality control, project management, public offices, digitalization. Until August 2025, he was Secretary General with the Ministry of Energy, then General Manager with the Ministry of Ministry of Investments and European Projects.

At the end of December - The Board consisted of 6 members, of which 1 member (16.7%) is female and 5 members (83.3%) are male, with a ratio for gender diversity of 20%.

In 2024, the Board was composed of 7 members, out of which 1 member is female and 6 Board members male. The Group computed by error a gender diversity of 14.28% as an average ratio of female to total number of Board members instead the average ratio of female to male Board members. The restated ratio for diversity gender for 31st December 2024 is 16.67%.

The oversight of sustainability related impacts, risks, and opportunities is the responsibility of all BOD members. Rompetrol Rafinare SA BOD members oversee the setting of targets related to material impacts, risks and opportunities and monitor the progress towards these targets for the Company.

The administrative, management and supervisory bodies, and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, based on annual performance results as well as their knowledge of stakeholder views, foreseeable legislation, peers performance and industry trends. Progress towards such targets is monitored annually in the framework of the sustainability statement and individual KPIs.

In its activity, the BOD is supported by two advisory committees namely: Audit Committee and Strategy Committee. The two advisory committees are charged with carrying out analyses and developing recommendations for the Board of Directors, in the specific fields, having the obligation to periodically submit activity reports to the members of the Board of Directors.

The audit committee assists the Board of Directors in fulfilling its responsibilities regarding the integrity of the Company's financial statements, the financial reporting process, the internal control system and risk management, the internal and external audit process, the qualifications and independence of the internal and external auditor and the company's performance, as well as and the process of monitoring compliance with laws and regulations and any code applicable to the company.

Besides the two already mentioned committees, the Board of Directors could establish advisory committees that have a role in conducting investigations and developing recommendations for the Board of Directors, in its fields of activity.

Sustainability reporting of Rompetrol Rafinare SA (RRC) and subsidiary entities, which includes stakeholder engagement, risk assessments, target setting, KPI progress, and compliance with regulatory frameworks (e.g., EU Taxonomy, CSRD), is reviewed and approved at the BOD level. Through this process, the Board ensures transparency, accountability, and alignment with corporate strategy. Additionally, based on performance evaluations and risk analyses, the BOD may provide strategic recommendations to enhance sustainability initiatives, mitigate emerging risks, and drive continuous improvement in ESG performance, reinforcing long-term resilience and value creation.

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Subsidiaries of Rompetrol Rafinare SA -

Rom Oil SA is administered in a unitary system by a Board of Directors and is constituted in accordance with the provisions of the Articles of Incorporation of the Company. Its composition, organization, attributions and responsibilities are established by the Company's Constitutive Act.

The Directors are elected by the Ordinary General Meeting of Shareholders and currently one of them hold executive function. The Board of Directors consists of 3 members. The President coordinates the work of the Board and report thereon to the General Meeting of Shareholders. The President/ Chairman supervises the good functioning of the Board, convene it, establish the agenda of the meetings, ensure that the members of the Board are properly informed of the items on the agenda and chair the meetings of the Board.

The members of the Board of Directors possess experience relevant to the sectors, products and geographic locations of the undertaking as follows:

Baurzhan Nurgaliyev – Chairman/ President of the Board of Directors

He joined Rompetrol Group in 2023 and has over 20 years of professional expertise in management, negotiation and jurisprudence. He held several top management positions in various multinational companies from Kazakhstan.

Ovidiu Cristian Ilie – Member of the Board of Directors

He joined the Rompetrol Group in 2012 and he had a high professional experience in managing and optimizing the supply and trading activity with petroleum products. He currently holds the position of Group Logistics Director at KMGI.

Lilian Alexandru – Member of the Board of Directors

He joined Rompetrol in 2008 and acting over 25 years in Trading and Management positions, out of which last 13 years in LPG business having a deep knowledge of LPG markets and business in Balkans and in the Black Sea and Mediterranean Sea basins. He currently holds the positions of Sole Director of Rompetrol gas

The oversight of sustainability related impacts, risks, and opportunities is the responsibility of all BoD members.

The administrative and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, based on annual performance results as well as their knowledge of stakeholder views, foreseeable legislation, peers performance and industry trends. Progress towards such targets is monitored annually in the framework of the sustainability statement and individual KPIs.

Rompetrol Downstream SRL is administered by a Board of Directors and is constituted in accordance with the provisions of the Articles of Incorporation of the Company. Its composition, organization, attributions and responsibilities are established by the Company's Constitutive Act.

The Directors are elected by the Ordinary General Meeting of Shareholders and currently one of them hold executive function. The Board of Directors consists of 4 members. The President coordinates the work of the Board and report thereon to the General Meeting of Shareholders. The President supervises the good functioning of the Board, convene it, establish the agenda of the meetings, ensure that the members of the Board are properly informed of the items on the agenda and chair the meetings of the Board.

The members of the Board of Directors possess experience relevant to the sectors, products and geographic locations of the undertaking as follows:

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Abi Zivs – Chairman/ President of the Board of Directors

Mr. Zivs has joined our company as **Chief Officer Trading and Supply Chain.** Until the appointment of the new Chief Officer Marketing and Retail, Abi Zivs will also fulfil the responsibilities for this position as Acting as Chief Officer Marketing and Retail.

In this role, Abi will contribute to defining the strategy and ensuring the operational management for the Trading and Supply Chain Business Unit, in compliance with KMG International strategy, to fulfil the business objectives and to achieve the established operational and financial performance.

Abi is a graduate of the Faculty of Physics and Mathematics at Latvian State University. He has also completed advanced training in Port and Ship Management at Lloyd's Maritime Academy in London and currently is pursuing an MBA in Marketing. With over 30 years of professional experience, Abi has held managerial positions such as General Manager, Executive Director, and LPG & Sulphur Sales Manager within companies from Latvia, Turkey, and Kazakhstan, including Nostrum Oil & Gas, CSA Elektrik Elektronic AS, and Fresh Ltd Aktau.

Nazar Mukhametkali – Member of the Board of Directors

Adrian Tohanean – Member of the Board of Directors

Saniya Sadykova-Ibatullina - Member of the Board of Directors

The oversight of sustainability related impacts, risks, and opportunities is the responsibility of all BoD members.

Rompetrol Logistics SRL is administered by a Sole Director in accordance with the provisions of the Articles of Incorporation of the Company. Its attributions and responsibilities are established by the Company's Constitutive Act.

The Director is elected by the Ordinary General Meeting of Shareholders.

The Sole Director possess experience relevant to the sectors, products and geographic locations of the undertaking as follows:

Ovidiu Cristian Ilie - Sole Director

He joined the Rompetrol Group in 2012 and holds extensive professional experience in managing and optimizing the supply and trading activity with petroleum products. He currently holds the position of Group Logistics Director at KMG International.

The oversight of sustainability related impacts, risks, and opportunities is the responsibility of the Sole Director.

The administrative and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, based on annual performance results as well as their knowledge of stakeholder views, foreseeable legislation, peers performance and industry trends. Progress towards such targets is monitored annually in the framework of the sustainability statement and individual KPIs.

Rompetrol Quality Control SRL is administered by a Sole Director in accordance with the provisions of the Articles of Incorporation of the Company. Its attributions and responsibilities are established by the Company's Constitutive Act.

The Director is elected by the Ordinary General Meeting of Shareholders.

The Sole Director – Alexandru Stavarache

Rompetrol Petrochemicals SRL is administered by a Sole Director in accordance with the provisions of the Articles of Incorporation of the Company. Its attributions and responsibilities are established by the Company's Constitutive Act.

The Director is elected by the Ordinary General Meeting of Shareholders.

The Sole Director possess experience relevant to the sectors, products and geographic locations of the undertaking as follows:

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Alexandru Stavarache - Sole Director

He joined Rompetrol Group in 2007 and has extensive professional experience in various functions within KMG International Group, including: Budgeting and Reporting Analyst, Capital Investment Analyst, Senior Business Analyst, and Planning and Performance Management Director. He currently holds the position of CFO of Rompetrol Rafinare SA.

The oversight of sustainability related impacts, risks, and opportunities is the responsibility of the Sole Director.

The administrative and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, based on annual performance results as well as their knowledge of stakeholder views, foreseeable legislation, peers performance and industry trends. Progress towards such targets is monitored annually in the framework of the sustainability statement and individual KPIs.

Rompetrol Gas SRL is administered by a Sole Director in accordance with the provisions of the Articles of Incorporation of the Company. Its attributions and responsibilities are established by the Company's Constitutive Act.

The Director is elected by the Ordinary General Meeting of Shareholders.

The Sole Director possess experience relevant to the sectors, products and geographic locations of the undertaking as follows:

Lilian Alexandru - Sole Director

He joined Rompetrol in 2008, holds extensive knowledge of LPG markets and business in Balkans and in the Black Sea and Mediterranean Sea basins.

The oversight of sustainability related impacts, risks, and opportunities is the responsibility of the Sole Director.

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

GOV-2

In line with the definition set out in ESRS Annex II, the administrative, management and supervisory bodies (AMSB) of Rompetrol Rafinare SA include the Board of Directors and senior management responsible for the strategic direction, oversight and supervision of the Company.

Throughout the year, the AMSB of Rompetrol Rafinare SA are informed on sustainability-related matters through a combination of internal reporting from management and Group-level coordination. Internally, management provides updates to the Board of Directors on the sustainability situation of the Company, including material impacts, risks and opportunities (IROs), climate- and environment-related risks, updates to the risk register, mitigation measures, and progress on policies, action plans, metrics and targets. These topics are addressed as part of regular Board discussions and whenever material developments occur, without a predefined fixed reporting calendar.

In addition, Rompetrol Rafinare SA receives information from its parent company, KMG International, through the Group Sustainability Director. This information covers sustainability matters relevant at Group level, including consolidated material impacts, risks and opportunities, due diligence implementation and the effectiveness of policies, actions, metrics and targets across the Group. The Group Sustainability Director ensures alignment and consistency by informing the AMSB of all Group entities, including Rompetrol Rafinare SA and its affiliates, while allowing for entity-specific assessments and decisions.

The AMSB of Rompetrol Rafinare SA actively address sustainability matters by considering identified impacts, risks and opportunities when overseeing the Company’s strategy, business model and risk management framework. During the reporting period, the Board of Directors specifically addressed material climate and environmental topics through updates to the Company’s risk register.

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Sustainability-related targets are defined at entity level, reflecting the specific business profile, operational characteristics, objectives and developments of Rompetrol Rafinare SA and of each subsidiary. These entity-level targets are subsequently consolidated at the level of Rompetrol Rafinare and KMG International, ensuring coherence at Group level while maintaining relevance and proportionality for each entity.

The Board of Directors of Rompetrol Rafinare SA performs oversight of sustainability matters, including the assessment and evolution of the strategy and business model, the identification and assessment of material IROs, the supervision of sustainability-related policies, targets, action plans and allocated resources, as well as sustainability reporting. A detailed list of material impacts, risks and opportunities addressed by the AMSB or their relevant committees during the reporting period is presented in the section Material impacts, risks and opportunities and their interaction with strategy and business model.

The Chairman of the Board of Directors has primary responsibility for coordinating the activity of the Board and reporting to the General Meeting of Shareholders. The President ensures the effective functioning of the Board, convenes meetings, sets agendas, ensures that Board members are adequately informed on agenda items and presides over Board meetings.

The BOD performs oversight of sustainability aspects, including assessment and changes to our strategy and business model, identification and assessment process of material IROs, supervisory of policies, targets, action plans and resources, as well as sustainability reporting. A list of the material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies, or their relevant committees during the reporting period is presented below in section **Material impacts, risks and opportunities and their interaction with strategy and business model.**

1.3.3 Integration of sustainability-related performance in incentive schemes

GOV-3

The current Remuneration Policy does not take into account ESG factors nor any sustainability-related aspects. The performance criteria are based on financial performance, efficiency and stakeholder management. The performance evaluation includes no specific sustainability-linked targets nor impacts, and such metrics are not utilized as performance benchmarks, at the end of FY 2025.

We do not yet integrate climate-related considerations into our remuneration strategies for members of our administrative, management and supervisory bodies. Climate-related considerations are not yet included in their assessment on an ongoing basis to ensure alignment with the company's targets to reduce GHG emissions. Our aim is to do so in the future.

1.4 Risk management and control systems

1.4.1 Description of the due diligence on sustainability matters

GOV-4

Our sustainability due diligence process guides our assessment of key identified risks and opportunities (IROs). This ongoing process, performed at Group level – KMG International (and implicitly Rompetrol Rafinare and affiliated entities) involves identifying, preventing, mitigating, and addressing actual and potential negative impacts on the ESG topics linked to our business activities, where we have a series of internal policies, controls, and guidelines that support our formal system of governance and decision making. We also integrate key elements of due diligence concerning people and the environment into our governance, strategy, and business model.

Our sustainability reports showcase essential components, including risk identification and assessment, implementation of mitigation strategies, and monitoring their effectiveness. Stakeholder engagement is also emphasized as a crucial part of the due diligence process, ensuring a comprehensive approach.

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However, identifying and assessing negative impacts or monitoring the effectiveness of these efforts and communication are included within the companies' ISO systems that come with relevant action plans (ISO 9001, 14001 and 45001).

The Group has publicly committed to conducting its business in an ethical, transparent and responsible manner, in line with applicable laws, international standards and good corporate governance practices. These commitments are formalised through internal policies and codes of conduct, which are approved by the administrative, management and supervisory bodies and apply across the Group's operations. The commitments address key areas such as business ethics, anti-corruption and bribery, conflicts of interest, compliance with laws and respect for human rights. They are communicated to employees and relevant business partners and are supported by implementation measures, including internal procedures, awareness activities and monitoring mechanisms, to ensure their effective application in practice.

The outcome of our sustainability due diligence process contributes to the assessment of significant impacts, risks and opportunities. The due diligence process is aimed at identifying, preventing, mitigating and explaining the approach to negative environmental impacts and people associated with the business of the company. This process is in line with international instruments, such as the UN Business and Human Rights Guidelines and the OECD guidelines for multinational undertakings. The stages of the due diligence process include identification and evaluation of negative impacts from the operations and value chain of the company/ Group KMG International, prioritization of actions according to severity and probability, and support the identification of significant sustainability risks and opportunities.

Rompetrol has a structured sustainability due diligence process approach that integrates stakeholder engagement, value chain oversight, and impact assessment. The company actively engages with key stakeholders—including employees, suppliers, communities, regulators, and investors—through consultations, supplier sustainability assessments. To assess sustainability-related impacts, risks, and opportunities (IROs), the company conducts climate risk assessments, safety performance monitoring, and environmental impact studies, ensuring responsible operations. Mitigation measures, such as GHG emissions reduction strategies, workplace safety improvements, and anti-corruption policies, are embedded into corporate governance. Additionally, Rompetrol provides grievance mechanisms, including whistle-blower programs and stakeholder feedback channels, to address human rights concerns, environmental risks, and ethical violations. The company continuously monitors sustainability performance through KPIs, regulatory compliance tracking, and ESG reporting, aligning disclosures with CSRD to ensure transparency and accountability.

1.4.2 Risk management and internal controls over sustainability reporting

GOV-5

Risk management and internal controls related to sustainability reporting are implemented at the Group level (KMG International), ensuring a macro-level perspective that enhances oversight and consistency across Rompetrol Rafinare S.A. and its affiliated entities. This centralized approach enables better management, streamlined governance, and strengthened data integrity, aligning with the Group's sustainability commitments and regulatory requirements.

To ensure a holistic ESG reporting approach, our internal sustainability reporting team includes key functions across KMG International: Operational, Accounting & Finance, Legal, Procurement, QHSE, Human Resources, Compliance, etc.

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Our core elements of the due diligence process includes:

1. Identifying and Assessing Risks & Impacts
    - Evaluating GHG emissions, climate risks, and environmental impacts (e.g., air and water pollution, biodiversity loss).
    - Monitoring health and safety risks for workers, contractors, and communities near operations.
    - Assessing social and governance factors, such as human rights, fair labor practices, and anti-corruption efforts.
2. Integrating and Acting on Findings
    - Implementing measures to reduce environmental impact, such as low-carbon fuel production, energy efficiency improvements, and spill prevention protocols.
    - Strengthening supply chain oversight through ESG screening processes.
    - Enhancing community engagement to address concerns related to emissions, and local economic impact.
3. Monitoring and Reporting
    - Conducting environmental impact assessments and sustainability audits to track compliance with national and EU regulations.
    - Aligning sustainability disclosures with ESG frameworks
    - Implementing grievance mechanisms and stakeholder feedback loops to address concerns in real time.
4. Remediating and Communicating
    - Establishing clear corrective actions for sustainability violations or incidents (e.g., oil spills, emissions breaches).
    - Publicly disclosing sustainability performance and progress on decarbonization efforts.
    - Engaging with regulators, investors, and communities to ensure transparency and continuous improvement.

The mitigation strategies incorporate a range of internal controls to effectively manage environmental, social, and governance (ESG) risks. Governance and compliance controls include internal policies and a Code of Ethics, prohibiting unethical practices such as corruption and environmental violations. Environmental risk controls focus on ISO 14001-certified Environmental Management Systems (EMS), monitoring GHG emissions etc. Social risk controls involve human rights due diligence for suppliers, whistleblower mechanisms, and adherence to ISO 45001 health and safety standards to ensure workplace well-being. Financial and anti-corruption controls include strict fraud prevention aligned with the OECD Anti-Bribery Convention, transaction monitoring, and investment screening to meet “Do No Significant Harm” (DNSH) criteria under the EU Taxonomy. Together, these controls ensure transparency, accountability, and the effective mitigation of ESG risks, as detailed below and across this current report.

To respond to increased unpredictability it has faced in recent years, Rompetrol Rafinare SA and KMG International as a Group of companies owning the majority of shares in Rompetrol Rafinare SA, implemented the Corporate Risk Management System (CRMS), incorporating structured and standardized practices, principles and tools to manage risks across the entire organisation.

The Risk Management Department coordinates the development and implementation of the abovementioned framework and performs periodic reassessment of risks and mitigation measures at the level of each entity. ERM framework and methodologies is exhaustive, targeting all types of risks, including market, financial risks, operational risks or strategic risks.

For a more comprehensive approach, ESG Risk Management Policy has been developed to manage risks related to Environmental, Social and Governance across KMG International, due to intrinsic particularities of these topics.

The scope of the ESG Risk Management Process is to define and standardize the goals, objectives, terminology, and core principles for managing Environmental, Social, and Governance (ESG) risks within KMGI Group.

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The Policy details the methodologies, workflows, tools and responsibilities for identifying, assessing, mitigating, monitoring, and reporting ESG risks, including climate related risks.

The objective of the Policy is to integrate ESG risks into the current risk management framework, Group strategy and operations, ensuring compliance with regulatory requirements and meeting stakeholder expectations.

The ESG risk management process follows similar methodologies as the established Corporate Risk Management System steps, including risk identification, risk assessment, risk mitigation, risk monitoring, and risk reporting to various stakeholders.

In order to identify and assess ESG risks across Rompetrol Rafinare SA and its affiliates companies. We have defined first the entities in scope and analysis parameters, starting with the material topics determined through DMA process.

ESG risk assessment process aims to evaluate the likelihood and severity of identified ESG risks through both quantitative and qualitative analysis. This involves using a structured approach that integrates risk scoring, scenario analysis, and prioritization methodologies to identify, assess, and mitigate ESG risks effectively while aligning with ESRS and CSRD standards.

In the sustainability reporting process, Rompetrol proactively manages risks by conducting internal verifications, pre-calculations, and data validations before disclosure and the audit process. Where information is unavailable, this is transparently stated in the report. In case of any identified errors, corrections are published in the subsequent reporting cycle, ensuring accuracy, accountability, and continuous improvement in sustainability disclosures.

Each identified ESG risk is assessed based on its likelihood, potential impact, and relevance to stakeholders. Following this process a score is assigned that helps the prioritization of risks, focusing on those with higher impacts and likelihoods.

A variety of tools, including risk registers, risk matrixes, and Key Risk Indicators (KRIs), are employed to create a more standardized and systematic method for assessing and centralizing risk assessment results. This approach encompasses all business processes, areas, and activities, addressing all types of emerging risks, from environmental, safety, and operational risks to financial, legal, and compliance risks.

The results of the risk assessment process are submitted to the Business and Risk Owners and the relevant level of authority, for review and mitigation. Given the specifics of the refining business, Rompetrol Rafinare SA in particular is exposed to a wide variety of risks, and operates in a highly volatile, complex and dynamic industry, widely influenced by the macroeconomic and geopolitical contexts. The objectives of the ESG risk management activities are to enhance decision-making, to protect the assets and financial performance of our company and subsidiaries and to ensure their stability. To mitigate these risks, corresponding mitigation actions are proposed by business owners

Under the 2025 ESG risk assessment, the most material challenges identified for Rompetrol Rafinare and its affiliated companies remain associated with climate transition factors. These are largely influenced by evolving regulatory frameworks and the ongoing adoption of lower-carbon technologies.

The priority areas in which work will continue are implementation of EU and national decarbonization requirements, the continuous adaptation of strategy with the energy transition necessities, key exposures being related to potential cost impacts linked to environmental compliance. In 2025, work in these areas included monitoring relevant regulatory developments, reviewing the approach to decarbonization initiatives, and further developing internal ESG governance practices. Over the next year, attention will remain on maintaining alignment with upcoming regulatory milestones and continuing implementation of these measures.

Medium-rated risks, mainly connected to physical climate impacts and environmental performance, were also identified as relevant. The assessment noted potential exposure of assets to extreme weather events and the continued importance of managing air emissions, water quality, and wastewater discharges. In 2025, actions included measures intended to support operational resilience, strengthen monitoring and control systems for emissions and effluents, and review preventive and emergency arrangements. These areas will continue to be monitored and adjusted as needed, with performance

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tracked against applicable requirements and any deviations addressed in line with established processes.

Going forward, monitoring of energy efficiency, emissions, water discharge parameters, and climate-related operational indicators will remain part of ongoing management activities. The organization will also continue internal capability development and engagement with regulators and stakeholders, with the objective of supporting compliance, operational continuity, and an orderly transition consistent with relevant sustainability and decarbonization expectations.

Oversight of higher-rated climate transition risks will continue, alongside support to operational teams in monitoring and reviewing ESG performance indicators.

1.5 Materiality analysis and results according to the concept of double materiality

1.5.1 Description of the processes to identify and assess material impacts, risks and opportunities

IRO-1

The double materiality assessment is conducted through our comprehensive process that aims to identify, assess, prioritize and monitor both potential and actual impacts on people and the environment, as well as risks and opportunities that may in turn have a financial effect on the company. Our assessment follows a systematic approach. To meet the requirements of the ESRS standards for 2024, KMG International/ Rompetrol followed the below steps in order to identify the level of materiality:

A Workshop was held to identify stakeholders and material topics. The workshop is organized by the person responsible for sustainability and corporate social responsibility, attended by representatives of several departments of KMG International and affiliated companies, as experts in their respective fields and the team that is responsible for the preparation of the Rompetrol Sustainability Report. The workshop included an assessment of the impact of material topics1 through internal consultation, which include topics, sub-topics and sub-sub-sub-topics, as well as their relevance. For the subjects identified as relevant, the workshop included a session to establish financial materiality.

For each topic, sub-topic and sub-sub-topic identified, an external consultation was carried out in the form of questionnaires. When identifying material topics along the Rompetrol value chain, different types of relevant internal and external stakeholders are consulted to gather a more diverse perspective on the most significant material topics to include in the report. In the consultation process, if and/or when personal data is collected, the contact list comply with all GDPR requirements.

Determining the final list of material topics is based on an assessment of the materiality of impacts, risks and opportunities. Every year the materiality will be complemented by a legal requirements analysis, materiality analysis of other industry operators (peer analysis), top-management interviews, strategic documents prepared by the company, expert opinions, and benchmarking on global trends in the literature, as well as data collected on the history of Rompetrol entities or other relevant sources. The materiality analysis for 2024 was completed at the data point level, in relations with the above-mentioned consultations and studies.

[1] We considered ESRS 2, Disclosure Requirement IRO-1, paragraph 53(b)(iv) mandating that undertakings provide a detailed description of how their processes prioritize negative impacts based on their relative severity and likelihood, and positive impacts based on their relative scale and likelihood.

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For the financial materiality assessment, KMG International conducted a workshop with representatives from financial and risks departments and a series of interviews for senior management to identify the risks and opportunities of Rompetrol's activities and determine the likelihood of occurrence and the potential magnitude of financial effect the sustainability topics may have on the company. For identification and assessment of impacts, risks and opportunities, we used internal and external assessments, while ensuring coverage of all relevant operations, including value chain aspects according to ESRS guidance. The evaluation of criteria used in the double materiality assessment for the financial materiality is focusing on KMGI activities. It guides the assessment of the financial impact and the likelihood of risks or opportunities. The scale for the level of financial impact, ranging from minimal effects (less than 0.1% of turnover) to very large impacts (over 3.0% of turnover), with defined percentage thresholds for each level. The scale of the occurrence probability of risks and opportunities, spanning from very small (occurring only once in the next 10 years) to very large (within less than one year). These scales serve as a basis for evaluation and decision-making, with the option to align with KMGI's internal risk thresholds where applicable. The thresholds for the financial materiality is described in the below table:

Potential Extent of Financial impact		
Explanation	Estimated financial impact based on descriptions regarding continued resource use, relationship dependency, and other effects on future cash flow	
5	Very large financial effect	Over 3.0% turnover
4	Large financial effect	Over 2.0% but under 3.0% turnover
3	Significant financial effect	Over 0.7% but under 2.0% turnover
2	Moderate financial effect	Over 0.1% but under 0.7% turnover
1	Minimal financial effect	Under 0.1% turnover

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), remediability (for negative impacts) and likelihood (for positive and potential negative impacts). Quantitative thresholds were set to determine the relevance of the themes, and qualitative criteria provided context for interpreting the results. The following table shows the description of the impact materiality:

Impact extent, possibility of mitigation and probability of occurrence on other topics		
Scale assessment of the extent of physical impact		
5	Large-scale subject-topic physical impact	
4	Medium-high scale physical impact	
3	Medium-scale physical impact	
2	Local physical impact	
1	Small-scale negligible impact	
Scale assessment possibility for irremediability (only for negative impact)		
5	Non-remediable or irreversible	Negative impacts could not be remediated
4	Partially remediable	KMGI's negative impacts could be only partially remediated
3	Mostly remediable	KMGI's negative impacts could be mostly remediated
2	Relatively easy to remedy in the short term	KMGI's potential negative impacts can be partially prevented or can be immediately remediated
1	Fully preventable	KMGI's potential negative impacts can be fully prevented
Scale assessment of the occurrence of impact probability		
5	Very high	In less than 1 year
4	Large	In the next 1-2 years
3	Average	In the next 2-5 years
2	Small	In the next 5-10 years
1	Very small	One time in the next 10 years

For the 2025 reporting year, working sessions were organized with internal stakeholders, the same ones that were also involved in the 2024 analysis process. During these meetings, the following objectives were pursued:

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- Validating and maintaining existing IROs, confirming their relevance and applicability;
- Validating the grades awarded for material impact and financial impact;
- Verifying the existence of possible new IROs, as a result of changes in the internal or external context – an aspect that was not confirmed;
- Reviewing existing IROs to identify possible themes that are no longer applicable – a situation that was not found.

Furthermore, the IROs validated in the previous year were reconfirmed, and two new IROs were identified and agreed during the meeting for the material S1 – Own Workforce and E3 – Water Discharge. Based on the updated analysis and meeting discussion, 2 additional material impacts and 2 material risks (IROs) have been identified as applicable for FY2025. This reflects new IROs identified for the FY25 reporting period and were below materiality in prior year.

S1 – Own Workforce:

- Negative impact – Despite the existence of a comprehensive legislative framework, supported by internal policies, procedures, and controls designed to protect employee health and safety, the nature of industrial operations entails inherent occupational risks. As a result, the possibility of incidents or accidents cannot be entirely eliminated.
- Risk – A residual, through limited, liability risk remains associated with sporadic workplace incidents or accidents, despite the preventive and mitigation measures implemented by the Company.

E3 – Water discharge:

- Negative impact – Despite continuous efforts to reduce water consumption and improve water discharge management, significant volumes of water are still abstracted and discharged at industrial sites. These activities may contribute to local water stress and have potential impacts on aquatic ecosystems and nearby communities, even though operations are conducted in compliance with applicable regulations and recognized best practices.
- Risk – There is a limited financial risk associated with the potential need for additional investments in water efficiency measures and advanced treatment technologies in response to evolving regulatory requirements and increasing stakeholder expectations. We established a process to identify and assess climate-related impacts, risks, and opportunities, particularly in relation to our GHG emissions (See further details in dedicated chapter - E1). Rompetrol is actively engaging in initiatives that not only address short-term risks but also unlock long-term value through the development of new products and services. Our complex metric system for managing environmental aspects, encompassing water and energy consumption, emissions, and waste management, reflects our dedication to environmental stewardship and climate change mitigation. Environmental issues, including the process of obtaining permits, certifications, and post-audit follow-up measures, are communicated through various channels such as weekly management meetings, monthly Group Management reports, quarterly Risk Register updates, and yearly Integrated Management System Analyses. This multi-faceted reporting structure ensures that environmental considerations remain at the forefront of our management's decision-making processes.

The following table presents the topics resulting from the double materiality assessment for which material IROs were identified.

ESRS Topics	Sustainability topics covered by the ESRS		
	Topic	**Sub-topic**	**Sub-sub-topic**
ESRS E1	Climate change	Climate change adaptation	
		Climate change mitigation	
		Energy	
ESRS E2	Pollution	Pollution of air	
		Pollution of water	
		Pollution of soil	
		Substances of concern	

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ESRS Topics	Sustainability topics covered by the ESRS		
	Topic	**Topic**	**Topic**
ESRS E3	Water and marine resources	Water	Water consumption
			Water withdrawals
			Water discharges
		Marine resources	Extraction and use of marine resources
ESRS E5	Resource use and circular economy	Waste	
ESRS S1	Own workforce	Working conditions	Secure employment
			Working time
			Adequate wages
			Social dialogue
			Freedom of association, the existence of works councils and the information, consultation and participation rights of workers
			Collective bargaining, including rate of workers covered by collective agreements
			Work-life balance
			Health and safety
		Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value
			Training and skills development
			Employment and inclusion of persons with disabilities
			Measures against violence and harassment in the workplace
			Diversity
		Other work-related rights	Privacy
			Freedom of expression
			Access to (quality) information
ESRS S4	Consumers and end-users	Information-related impacts for consumers and/or end-users	Privacy
			Freedom of expression
			Access to (quality) information
		Personal safety of consumers and/or end-users	Health and safety
			Security of a person
ESRS G1	Business conduct	Corporate culture	
		Protection of whistle-blowers	
		Management of relationships with suppliers including payment practices	
		Corruption and bribery	Prevention and detection including training
			Incidents

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In the table below we present the topics, sub-topics and sub-sub-topics that will not be addressed in the 2025 Sustainability Report, as well as a brief justification as to why they are being omitted.

ESRS Topics	Sustainability aspects that are not material, therefore not covered by the 2025 Sustainability Report				
	Topic	**Sub-topic**	**Sub-subtopics**	**DR**	**Explanations**
ESRS E2	Pollution	Pollution of living organisms and food resources	-	There are not specific DRs related only to this topic	Not applicable – the activity does not affect crops or other food sources
		Substances of very high concern	-	ESRS E2_23 (d)[2] ESRS E2_35	Not applicable – only RQC uses 5 substances from the list: phenolphthalein, potassium dichromate, potassium chromate, boric acid, lead II acetate trihydrate. Special permits of use are not required; lab limited usage, low quantities.
		Microplastics	-	There are not specific DRs related only to this topic	Not applicable – the activity does involve the addition of micro plastics into products
ESRS E4	Biodiversity and ecosystems	Direct impact drivers of biodiversity loss	Climate Change	ESRS E4_35 ESRS E4_36 ESRS E4_38 (a) ESRS E4_38 (b) ESRS E4_38 (c) ESRS E4_38 (d) ESRS E4_38 (e) ESRS E4_39 ESRS E4_40 (a) ESRS E4_40 (b) ESRS E4_40 (c) ESRS E4_40 (d)i. ESRS E4_40 (d)ii. ESRS E4_41 (a) ESRS E4_41 (b)i. ESRS E4_41 (b)ii. ESRS E4_41 (b)iii.	Not applicable – Rompetrol does not carry out activities that have a direct impact on biodiversity or ecosystems. Furthermore, the wood used in production has FSC certifications. Also, the subsidiaries have environmental permits for operation.
			Land-use change, fresh water-use change and sea-use change		
			Invasive alien species		
		Impacts on the state of species	Species population size		Not applicable – no such risks were identified in the authorization studies
			Species global extinction risk		
		Impacts on the extent and condition of ecosystems	Desertification		Not applicable – there is no direct activity on areas at risk of desertification
			Soil sealing		Not applicable – the activity is not associated with the footprint in protected areas
		Impacts and dependencies on ecosystem services	-		This topic was not identified as relevant in the authorization studies.
ESRS E5	Resource use and circular economy	Resources inflows, including resource use	-	ESRS E5 28; 29; 30; 31 (a); 31 (b); 31 (c); 32	Not material – the activity is not associated with significant input of resources other than petroleum.
		Resource outflows related to products and services	-	ESRS E5 33; 34 (a); 34 (b); 35; 36 (a); 36 (b); 36 (c); 37 (a); 37 (b) i; 37 (b) ii; 37 (b) iii; 37 (c) i; 37 (c) ii; 37(c) iii; 37 (d); 38 (a); 38 (b); 39; 40	Not material – the activity is not associated with significant outflow of resources other than petroleum.
ESRS S1	Own workforce	Other rights related to work	Child labour	ESRS S1_14 (f) i. ESRS S1_14 (f) ii. ESRS S1_14 (g) i. ESRS S1_14 (g) ii. ESRS S1_22 ESRS S1_104 (a) ESRS S1_104 (b)	This is not applicable in Romania where the companies carry out manufacturing activities.
			Forced labour		
			Adequate housing		

[2] This DR refers to both substances of concern and substances of very high concern

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ESRS Topics	Sustainability aspects that are not material, therefore not covered by the 2025 Sustainability Report				
	Topic	**Sub-topic**	**Sub-subtopics**	**DR**	**Explanations**
ESRS S2	Workers in the value chain	Working conditions	Secure employment	ESRS S2 9 10(a) i.; 10 (a) ii.; 10 (b); 11 (a) i.; 11 (a) ii.; 11 (a) iii.; 11 (a) iv.; 11(a) v.; 11 (b); 11 (c); 11 (d); 11 (e); 12; 13 14; 15; 16; 17 (a); 17(b); 17(c); 18; 19; 20; 21; 22 (a); 22 (b); 22 (c); 22 (d); 22 (e); 23; 24; 25; 26; 27 (a); 27 (b); 27 (c); 27 (d); 28; 29;30; 31 (a); 31 (b); 32 (a); 32 (b); 32 (c); 32 (d); 33 (a); 33 (b); 33 (c); 34 (a); 34 (b); 35; 36; 37; 38; 39 (a); 39 (b); 39 (c); 40; 41; 42 (a); 42 (b); 42 (c)	The Group considers the Health and safety sub-sub-topic as relevant for Workers in the value chain. Phase-in transitional provision is applied in line with Appendix C of ESRS 1 and simplified disclosure is provided on this matter.
			Working time		
			Adequate wages		
			Social dialogue		
			Freedom of association, including the existence of work councils		
			Collective bargaining		
			Work-life balance		
			Health and safety		
		Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value		There are no significant IROs above materiality thresholds.
			Training and skills development		
			The employment and inclusion of persons with disabilities		
			Measures against violence and harassment in the workplace		
			Diversity		
		Other rights related to work	Child labour		There are no significant IROs above materiality thresholds.
			Forced labour		
			Adequate housing		
			Water and sanitation		
			Privacy		
ESRS S3	Affected communities	Communities' economic, social and cultural rights	Adequate housing	There are not specific DRs related only to this topic	Not applicable – not a relevant aspect subject of the Rompetrol activity. All such potential aspects screened and managed in the EIA permitting process.
			Adequate food		
			Water and sewer		
		Rights of indigenous populations	Free, prior and informed consent	ESRS S3_9 (a) iv. ESRS S3_15 ESRS S3_16 (a) ESRS S3_17 ESRS S3_23	Not applicable – not material to the activity. There are no indigenous populations in Romania where the companies carry out activities
			Self-determination		
			Cultural rights		
ESRS S4	Consumers and end-users	Social inclusion of consumers and/or end-users	Non-discrimination	There are not specific DRs related only to this topic	Not applicable – not material to Rompetrol activities in Romania. Marketing aspects are related to information.
			Access to products and services		
			Responsible marketing practices		
ESRS G1	Business conduct	Animal welfare	-	ESRS G1_10 (f)	Not applicable as Rompetrol does not conduct animal experiments or does not raise animals to be used in the production activities
		Political engagement and lobbying activities	-	ESRS G1_29 (a) ESRS G1_29 (b) i. ESRS G1_29 (b) ii. ESRS G1_29 (c) ESRS G1_29 (d)	Not applicable as Rompetrol has no political interests or affiliations

Last year (for FY 2024) it was the first DMA the company conducted, as per ESRS; prior to this process we conducted materiality assessments as per GRI. We will conduct DMAs every 3 years, or more often if significant changes occur.

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1.5.2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

IRO-2

In our sustainability statement, we have adhered to the Disclosure Requirements stipulated by ESRS as displayed in the table below.

List of all datapoints that derive from other EU legislation as listed in Appendix B of ESRS 2.

Table ESRS 2_IRO-2_56

Disclosure Requirement and related datapoint	Reference to respective legislation	
	Benchmark Regulation reference	EU Climate Law reference
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Commission Delegated Regulation (EU) 2020/1816(5), Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Delegated Regulation (EU) 2020/1818(7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv	Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14		Regulation (EU) 2021/1119, Article 2(1) Directive (EU) 2024/1760, Article 1 (1c)
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2	
ESRS E1-4 GHG emission reduction targets paragraph 34	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56		Regulation (EU) 2021/1119, Article 2(1)
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	
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69	Delegated Regulation (EU) 2020/1818, Annex II	

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ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-14 Number of fatalities and number and rate of work- related accidents paragraph 88 (b) and (c)	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS S2-1Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Delegated Regulation (EU) 2020/1816, Annex II)	

1.5.3 Overview of all reported disclosure requirements identified as material

IRO-2

Based on our materiality assessment we have concluded that certain topics are not material (not applicable either to our company or in Romania), and accordingly, we have not included DR from the corresponding Topical Standards.

To align with ESRS requirements, the list of Disclosure Requirements adhered to during the preparation of the sustainability statement is disclosed in our sustainability statement. The following content index illustrates the locations where the lists of Disclosure Requirements can be found.

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Standard	Cross-cutting / Topic	Nr.	Reporting Area	Designation of the DRs	DR no.	Page
ESRS 2	General disclosures	BP-1	General	General basis for preparation of the sustainability statement	5 (a) 5 (b) i. 5 (c) 5 (d)	P 6
ESRS 2	General disclosures	BP-2	General	General basis for preparation of the sustainability statement	9 (a) 9 (b) 10 (a) 10 (b) 10 (c) 10 (d) 11 (a) 11 (b) i. 11 (b) ii. 16	P 6
ESRS 2	General disclosures	GOV-1	General	Governance	21 (a) 21 (b) 21 (c) 21 (d) 21 (e) 22 (a) 22 (b) 22 (c) i. 22 (c) ii. 22 (c) iii. 22 (d) 23 (a) 23 (b)	P 12 P 145
ESRS 2	General disclosures	GOV-2	General	Governance	26 (a) 26 (b) 26 (c)	P 16
ESRS 2	General disclosures	GOV-3	General	Governance	29 (a) 29 (b) 29 (c) 29 (d) 29 (e)	P17
ESRS 2	General disclosures	GOV-4	General	Governance	32	P 17
ESRS 2	General disclosures	GOV-5	General	Governance	36 (a) 36 (b) 36 (c) 36 (d) 36 (e)	P 18
ESRS 2	General disclosures	SBM-1	General	Strategy	40 (a) i. 40 (a) ii. 40 (a) iii. 40 (a) iv. 40 (e) 40 (f) 40 (g) 41 42 (a) 42 (b) 42 (c)	P 8
ESRS 2	General disclosures	SBM-2	General	Strategy	45 (a) i. 45 (a) ii. 45 (a) iii. 45 (a) iv. 45 (a) v. 45 (b) 45 (c) i. 45 (c) ii. 45 (c) iii. 45 (d)	P 11

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ESRS 2	General disclosures	IRO-1	General	Impact, risk and opportunity management	53 (a) 53 (b) i. 53 (b) ii. 53 (b) iii. 53 (b) iv. 53 (c) i. 53 (c) ii. 53 (c) iii. 53 (d) 53 (e) 53 (f) 53 (g) 53 (h)	P 19
ESRS 2	General disclosures	IRO-2	General	Impact, risk and opportunity management	56 57 59	P 27
ESRS 2	General disclosures		General		62	P 46
ESRS 2	General disclosures	MDR-P	General	Minimum disclosure requirement on policies and actions	65 (a) 65 (b) 65 (c) 65 (d) 65 (e) 65 (f)	P 46
ESRS 2	General disclosures	MDR-A	General	Minimum disclosure requirement on policies and actions	68 (a) 68 (b) 68 (c) 68 (d) 68 (e) 69 (a) 69 (b) 69 (c)	P 46
ESRS 2	General disclosures		General	Minimum disclosure requirement on policies and actions	72	P 46
ESRS 2	General disclosures	MDR-M	General	Metrics and targets	75 76 77 (a) 77 (b) 77 (c)	P 46
ESRS 2	General disclosures	MDR-T	General	Metrics and targets	80 (a) 80 (b) 80 (c) 80 (d) 80 (e) 80 (f) 80 (g) 80 (h) 80 (i) 80 (j) 81 (b) i. 81 (b) ii.	P 47

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Standard	Cross-cutting / Topic	Nr.	Designation of the DRs	DR number	Page
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ESRS E1	Climate change	E1-1	Strategy	16 (a) 16 (b) 16 (c) 16 (d) 16 (e) 16 (f) 16 (g) 16 (h) 16 (i) 16 (j) 17 AR 4 AR 5	P 49
ESRS E1	Climate change	SBM-3	Strategy	19 (a) 19 (b) 19 (c) AR 6 AR 7 (a) AR 7 (b) AR 7 (c) AR 8 (a) AR 8 (b)	P 49
ESRS E1	Climate change	IRO-1	Impact, risk and opportunity management	20 (a) 20 (b) i. 20 (b) ii. 20 (c) i. 20 (c) ii. 21 AR 9 (a) AR 9 (b) AR 11 (a) AR 11 (b) AR 11 (c) AR 11 (d) AR 12 (a) AR 12 (b) AR 12 (c) AR 12 (d) AR 13 (a) AR 13 (b) AR 13 (c) AR 13 (d) AR 15	P 50
ESRS E1	Climate change	E1-2	Impact, risk and opportunity management	24 25 (a) 25 (b) 25 (c) 25 (d) 25 (e)	P 54
ESRS E1	Climate change	E1-3	Impact, risk and opportunity management	29 (a) 29 (b) 29 (c) i. 29 (c) ii. 29 (c) iii. AR 21 AR 22	P 55

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ESRS E1	Climate change	E1-4	Metrics and targets	32 33 34 (b) 34 (c) 34 (d) 34 (e) 34 (f) AR 24 AR 25 (a) AR 25 (b) AR 25 (c) AR 25 (d) AR 26 AR 29 AR 30 (a) AR 30 (b) AR 30 (c)	P 57
ESRS E1	Climate change	E1-5	Metrics and targets	37 (a) 37 (b) 37 (c) i. 37 (c) ii. 37 (c) iii. 38 (a) 38 (b) 38 (c) 38 (d) 38 (e) 39 40 42 43 AR 32 (h) AR 32 (i) AR 33	P 64
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ENVIRONMENT					
ESRS E1	Climate change	E1-7	Metrics and targets	58 (a) 58 (b) 59 (a) 59 (b) 60 61 (a) 61 (b) 61 (c) AR 56 AR 57 (a) AR 57 (b) AR 57 (c) AR 57 (d) AR 58 (c) AR 58 (d) AR 58 (e) AR 58 (g) AR 59 AR 62 (a) AR 62 (b) AR 62 (c) AR 62 (d) AR 62 (e) AR 63 (b)	P 75
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ESRS E3	Water and Marine Resources	E3-3	Metrics and targets	22 23 (a) 23 (b) 23 (c) 25	P 103
ESRS E3	Water and Marine Resources	E3-4	Metrics and targets	28 (a) 28 (b) 28 (c) 28 (d) 28 (e) 29 AR 28 AR 29	P 105
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ESRS E5	Resource use and circular economy	E5-3	Metrics and targets	23 24 (a) 24 (b) 24 (c) 24 (d) 24 (e) 24 (f) 25 27 AR 18	P 119
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ESRS E5	Resource use and circular economy		Resource outflows – Waste	33 34 (a) 34 (b) 35 36 (a) 36 (b) 36 (c) 37 (a) 37 (b) i 37 (b) ii 37 (b) iii 37 (c) i 37 (c) ii 37 (c) iii 37 (d) 38 (a) 38 (b) 39 40	P 112

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ESRS S1	Own Workforce	S1-1	Impact, risk and opportunity management	19 20 (a) 20 (b) 20 (c) 21 22 23 24 (a) 24 (b) 24 (c) 24 (d) AR 11 AR 13	P 124
ESRS S1	Own Workforce	S1-2	Impact, risk and opportunity management	27 (a) 27 (b) 27 (c) 27 (d) 27 (e) 28 29	P 125
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SOCIAL					
ESRS S1	Own Workforce	S1-8	Metrics and targets	60 (a) 60 (b) 60 (c) 63 (a) 63 (b) AR 69 AR 70	P 141
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ESRS S1	Own Workforce	S1-16	Metrics and targets	97 (a) 97 (b) 97 (c) 99 AR 99 AR 100 AR 101 (a)	P 144
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ESRS S4	Consumers and end-users	S4-1	Impact, risk and opportunity management	15 16 (a) 16 (b) 16 (c) 17 AR 9 AR 10	P 164

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SOCIAL					
ESRS S4	Consumers and end-users	S4-2	Impact, risk and opportunity management	20 (a) 20 (b) 20 (c) 20 (d) 21 22	P 165
ESRS S4	Consumers and end-users	S4-3	Impact, risk and opportunity management	25 (a) 25 (b) 25 (c) 25 (d) 26 27	P 168
ESRS S4	Consumers and end-users	S4-4	Impact, risk and opportunity management	30 31 (a) 31 (b) 31 (c) 31 (d) 32 (a) 32 (b) 32 (c) 33 (a) 33 (b) 34 35 37	P 169
ESRS S4	Consumers and end-users	S4-5	Metrics and targets	40 41 (a) 41 (b) 41 (c)	P 168
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ESRS G1	Business Conduct	G1-1	Impact, risk and opportunity management	9 10 (a) 10 (b) 10 (c) i. 10 (c) ii. 10 (d) 10 (e) 10 (f) 10 (g) 10 (h)	P 171
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ESRS G1	Business Conduct	G1-3	Impact, risk and opportunity management	18 (a) 18 (b) 18 (c) 19 20 21 (a) 21 (b) 21 (c)	P 175
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ESRS G1	Business Conduct	G1-6	Metrics and targets	33 (a) 33 (b) 33 (c) 33 (d)	P 177

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

SBM-3

We conducted at Group level – KMG International - a double materiality assessment to identify our material impacts, risks, and opportunities. Their interaction with strategy and business model is further detailed in our topical chapters for each material topic. The following table shows the summarized results.

IMPACTS

Climate change		**Value chain**	**Actual / Potential**	**Time horizon**	**Strategic approach**
Climate change mitigation	**Negative impact -** Despite efforts to reduce emissions, oil and gas refining and marketing operations still generate significant direct greenhouse gas emissions, contributing to climate change concerns. Process emissions, fugitive emissions from leaks, venting and flaring, and emissions from non-routine events like equipment maintenance continue to pose environmental risks and contribute to the overall carbon footprint of the industry. The implementation of product specifications and renewable fuel blends by some regulatory jurisdictions in response to climate change presents significant compliance and operational risks for R&M companies, potentially affecting Rompetrol's operations and market competitiveness. Emissions specifically the GHG emissions contribute to climate change on a global scale which has in turn serious consequences such as extreme weather events, floods, as well as health effects and other indirect impacts on people and biodiversity.	Upstream, own operations, downstream	Actual	Short, medium, long	Decarbonization Strategy in place
Climate change adaptation	**Negative impact** - The potential negative impact at a small scale (local impact) if Rompetrol facilities are depleting water resources needed in case of extreme climate events – such as drought or wildfires, which can have a serious local impact on environment and people.	Upstream, own operations, downstream	Potential	Medium, Long	Climate risk assessments according to DNSH
Energy	**Positive impact -** Rompetrol is a large supplier or energy in the region, contributing to energy security of the area, and KMGI's energy production leverages innovative sustainable technologies, such as cogeneration and hydrogen production, to enhance energy efficiency and diversity, contributing to a cleaner energy supply.	Upstream, own operations, downstream	Actual	Short, medium, long	ISO 50000 system

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Pollution		Value chain	Actual / Potential	Time horizon	Strategic approach
Pollution of air	**Negative impact -** The potential for negative impact from air pollution is substantial. KMGI employs Best Available Techniques (BAT) and adheres to European pollution standards, successfully avoiding any exceedances. The emissions comprise pollutants that could significantly affect local human health and the environment. Air emissions from oil and gas operations, include hazardous air pollutants, criteria air pollutants, and volatile organic compounds (VOCs), which have significant, localized impacts on human health and the environment. Sulfur dioxide, nitrogen dioxide, and VOC emissions are of particular concern due to their potential health and environmental effects. Non-greenhouse gas air emissions from oil and gas midstream and downstream operations, including criteria air pollutants, VOCs, and hazardous air pollutants, can also have significant, localized impacts on human health and the environment.	Upstream, own operations, downstream	Actual	Short, medium, long	Alignment with legislation and permits. ISO 140001
Pollution of water	**Negative impact -** The operations of Refining & Marketing companies entail numerous hazards, including the handling of flammable and volatile substances, the utilization of highly reactive chemicals, and the processing of fluids under high temperature and pressure conditions. Potential releases of hydrocarbons or other hazardous substances resulting from accidents can lead to significant consequences for the company's workforce, as well as external social and environmental impacts.	Upstream, own operations	Actual	Short, medium, long	Alignment with legislation and permits. ISO 140001
Pollution of soil	**Negative impact -** Oil and gas production activities often result in habitat destruction, fragmentation, and loss, leading to declines in biodiversity and ecosystem services. The storage and transportation of crude oil, natural gas, and related products pose risks of spills and leaks, which can contaminate soil, water bodies, and surrounding ecosystems, harming wildlife and ecosystems. The operation of refineries, oil and gas infrastructure, such as pipelines and refineries, can disrupt natural habitats, fragment ecosystems, and contribute to air and water pollution, negatively impacting biodiversity and ecosystem health.	Upstream, own operations	Actual	Short, medium, long	Alignment with legislation and permits. ISO 140001
Substances of concern	**Negative impact - Production upstream and refining** at Rompetrol result in the generation of various forms of waste derived from the processing and storage of petroleum products. Non-greenhouse gas (GHG) air emissions from these operations include criteria air pollutants, Volatile Organic Compounds (VOCs), and hazardous air pollutants. These substances can have significant, localized impacts on human health and the environment. Specifically, they can contribute to air pollution, leading to respiratory issues and other health problems for nearby communities. Additionally, they can contaminate soil and water bodies, posing risks to ecosystems and wildlife. Efforts to mitigate these impacts are essential to ensure the health and safety of both human populations and the environment.	Upstream, own operations	Potential	Medium, Long	Alignment with legislation and permits. ISO 140001

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Water and Marine Resources		Value chain	Actual / Potential	Time horizon	Strategic approach
Water (as a resource)	**Negative impact -** Production of oil upstream and refineries can use relatively large quantities of water depending on their size and the complexity of the refining process. The amount of water withdrawn and consumed by an O&G company and the quality of its discharges can have impacts on ecosystems and people. Water discharge - Negative Impact – Despite continuous efforts to reduce water consumption and improve water discharge management, significant volumes of water are still abstracted and discharged at industrial sites. These activities may contribute to local water stress and have potential impacts on aquatic ecosystems and nearby communities, even though operations are conducted in compliance with applicable regulations and recognized best practices.	Upstream, own operations	Actual	Short, medium, long	Alignment with legislation and permits. ISO 140001
Resource use and circular economy		**Value chain**	**Actual / Potential**	**Time horizon**	**Strategic approach**
Waste	**Negative impact -** In operations of Rompetrol facilities, companies generate various forms of waste derived in particular from the processing and storage of petroleum products. These wastes need to be further processed, because they pose a threat to human health and the environment during storage, transport, processing or disposal.	Upstream, own operations	Actual	Short, medium, long	Alignment with legislation and permits. ISO 140001

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Own workforce		Value chain	Actual / Potential	Time horizon	Strategic approach
Working conditions	Positive impact - Rompetrol offers good working conditions under the worker union engagement, positively impacting KMGI's employee wellbeing, thereby fostering a positive societal development. Effective communication and negotiation between employees and management has a positive impact on employees' wellbeing, H&S, trainings, work-life balance aspects and adequate wages, and job security. KMGI supports the use of open communication channels, enabling employees to voice concerns and allegations, t strengthening transparency and trust among employees, reinforcing its dedication to fair compensation. Own workforce - Negative impact Despite the existence of a comprehensive legislative framework, supported by internal policies, procedures, and controls designed to protect employee health and safety, the nature of industrial operations entails inherent occupational risks. As a result, the possibility of incidents or accidents cannot be entirely eliminated. Risk – A residual, though limited, liability risk remains associated with sporadic workplace incidents or accidents, despite the preventive and mitigation measures implemented by the Company.	Own operations	Actual	Short, medium, long	Maintain good working conditions under the worker union engagement
Equal treatment and opportunities of all employees.	Positive impact - Rompetrol offers good working conditions under the worker union engagement, positively impacting KMGI's employee wellbeing, thereby fostering a positive societal development. Effective communication and negotiation between employees and management has a positive impact on employees' wellbeing, H&S, trainings, work-life balance aspects and adequate wages, and job security. KMGI supports the use of open communication channels, enabling employees to voice concerns and allegations, t strengthening transparency and trust among employees, reinforcing its dedication to fair compensation.	Own operations	Actual	Short, medium, long	Maintain equal treatment and opportunities of all employees
Other work-related rights	Positive impact - Rompetrol supports the use of open communication channels, enabling employees to voice concerns and allegations for work-related rights, specifically to ensure the welfare of our workers and the protection of their human rights.	Own operations	Potential	Short, medium long	Maintain open communication channels to ensure the protection of human rights.
Consumers and end-users		**Value chain**	**Actual / Potential**	**Time horizon**	**Strategic approach**
Information-related impacts	**Positive impact - Rompetrol applies strict own rules on** labelling, marketing information, aligned with local legislation and communication is not restricted to anyone to ensure social inclusion.	Downstream	Actual	Short, medium long	Policies in place for information, labelling, marketing
Personal safety	Negative impact - Human health risks and broad environmental risks, such as those associated with climate change, have raised concerns about the end use of products such as gasoline from the Oil & Gas Downstream. A primary objective of KMGI is our safety culture to reduce the probability of accidents and other health and safety incidents, including for our customers. The sale operation at fuel stations may pose hazards to customers if instructions on the use of products are not followed.	Downstream	Actual	Short, medium, long	Maintain quality personal safety information for products and services and safety measures in place

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Business Conduct		Value chain	Actual / Potential	Time horizon	Strategic approach
Corporate culture	**Positive impact -** KMGI has a Code of Ethics in place that applies to all KMG International activities and business relationships equally. This Code reflects core values and behavioural rules, aligning with the Universal Declaration of Human Rights and ensuring the highest integrity standards, to safeguard their own health, safety, and well-being and prevent accidents	Own operations	Actual	Short, medium, long	Policies and Procedures in place, ISO 9001, ISO 45000
Protection of whistle-blowers	**Positive impact -** KMGI offers a very high level of protection to whistle-blowers, all employees and stakeholders are protected from repercussions, all complaints/concerns are evaluated, registered and investigated in a professionally manner, maintaining the confidentiality of the information. Concerns can relate to transactions or events suspected of breaching laws, internal regulations, or integrity and ethics standards. Our policies in place protects the wellbeing of any potential claimant.	Upstream, own operations	Actual	Short, medium, long	Policies in place
Management of relationships with suppliers	**Negative impact -** There is a potential impact on suppliers if they do not receive timely payments for their goods and services, as well as no the security of supply for KMGI. The suppliers may suffer from financial instability which in turn can affect the wellbeing of their employees, while KMGI and its employees may suffer from consequences related to loosing critical suppliers.	Upstream, own operations	Potential	Medium, Long	Procurement policies
Avoiding corruption and bribery	**Negative impact -** Incidents of corruption are harmful to society, therefore all companies face pressure to address corruption and prevent involvement in illegal or unethical payments or gifts to government officials or private individuals.	Own operations	Potential	Medium, Long	Policies in place

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RISKS AND OPPORTUNITIES

Climate change		Value chain	Source	Time horizon
Climate change mitigation	**Risk -** Climate change mitigation in the oil and gas sector poses a high risk of significant greenhouse gas emissions from operations, leading to potential regulatory penalties. Despite EU-ETS compliance and KMGI's ongoing efforts to reduce emissions, stringent environmental regulations and global climate policies imply high operational and reputational risk. The company acknowledges that the impact is not severe enough to cause widespread destruction, however the significance of this issue remains unchanged. Regulatory jurisdictions may introduce product specifications and renewable fuel blends in response to climate change, presenting significant compliance and operational risks for refining and marketing (R&M) companies like KMGI. **Opportunity -** Opportunities are in the area of investment in low carbon technologies, carbon storage, and hydrogen.	Upstream, own operations, downstream	Risk sourced from both impact and dependencies Opportunity sourced from actions to address impact	Short, medium, long
Climate change adaptation	**Risk -** Inability to adapt to hazards from climate change may pose physical risks, such as potential disruptions to safety of production processes within KMGI, potentially resulting in a breach of legal requirements for risk prevention with negative financial consequences.	Upstream, own operations, downstream	Risk sourced from impact	Medium, Long
Energy	**Opportunity -** As an energy producer and distributor, KMGI recognizes a significant opportunity in the market dynamics, marked by the rising demand for electricity and the potential for investments in innovative technologies for low CO_2 emission energy production.	Upstream, own operations, downstream	Opportunity sourced from impact	Short, medium, long
Pollution			**Source**	**Time horizon**
Pollution of air	**Potentially significant risk -** Although KMGI adopts the best available techniques (BAT) and complies with the EU Standards on pollution without having recorded exceedances of air pollutant limits, the risks of exceeding these thresholds are taken into account, which can have significant financial consequences by suspending the activity by the authorities.	Upstream, own operations, downstream	Risk sourced from impact	Short, medium, long
Pollution of water	**Risk -** There is a **moderate risk** associated with the potential for authorities to suspend activities, while fines for violations are not considered significant.	Upstream, own operations	Risk sourced from impact	Short, medium, long
Pollution of soil	**Risk -** There is a **moderate risk** associated with Rompetrol's operations that may impact soil quality. All operations that could affect soil are regularly monitored and reported. The risk specifically pertains to the 14 lagoons at the Vega Refinery, covering an area of approximately 82,450 m2. These tanks are waterproofed with layers of compacted soil and bentonite. Currently, the refinery is undergoing a remediation project for the tanks, where existing waste is treated and deposited in waterproof cells according to Government Ordinance 757/2004.	Upstream, own operations	Risk sourced from impact	Short, medium, long
Substances of concern	**Risk -** Risks are associated with substances from accidental releases: Releases of hazardous substances can severely impact workforce health and the environment.	Upstream, own operations	Risk sourced from impact	Medium, Long

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Own workforce		Value chain	Source	Time horizon
Working conditions	**Opportunity -** By prioritizing worker safety and cultivating a safety culture, KMGI minimizes financial risks from litigations, reduces costs from employee turnover, decreases downtime, and enhances productivity.	Own operations	Opportunity sourced from dependencies	Short, medium, long
Equal treatment and pportunities of all mployees	**Opportunity - Reduced turnover costs and positive brand reputation contribute to KMGI financial stability, given that** KMGI has policies against forced labour, negotiation through the union, implemented occupational health and safety measures, and other policies and measures in place.	Own operations	Opportunity sourced from dependencies	Short, medium, long
Other work-related rights	**Opportunity -** Reduced turnover costs and positive brand reputation contribute to KMGI financial stability, given that KMGI has policies in place that ensure no forced labor, negotiation through the union, implemented occupational health and safety measures, flexible working arrangements, and aims to simplify employees' lives. Additionally, these policies ensure confidentiality of its employees and their union participation. Policies are regularly revised and enhanced.	Own operations	Opportunity sourced from dependencies	Short, medium, long
Consumers and end-users		**Value chain**	**Source**	**Time horizon**
Information-related impacts	**Opportunity -**There is a medium-level opportunity associated with information-related impacts, including labeling and marketing communications. Communication is unrestricted, fostering social inclusion, with potential financial impacts on brand awareness, loyalty, and sales. Additionally, maintaining market integrity and transparency in product pricing can mitigate regulatory risks and liabilities for Oil & Gas - Midstream & Downstream undertakings, while also safeguarding consumers from unfair pricing practices.	Downstream	Opportunity sourced from impacts	Short, medium, long
Personal safety	**Risk** - The low-level risk associated with personal safety is particularly important in petrol stations where safety is critical. Due to the safety measures put in place by KMGI there have been no reported fire incidents. Local regulatory measures pose additional compliance and legal risks with financial consequences.	Downstream	Risk sourced from impacts	Short, medium, long
Water and Marine Resources		**Value chain**	**Source**	**Time horizon**
Water as resource	**Risk** – Companies in the oil and gas industry may face risks related to limited water availability, depending on their location, which can lead to increased costs. Water withdrawal from water-stressed areas or potential water contamination may also create tensions with local communities. For KMGI, there are currently no significant concerns regarding water availability (medium–low risk) that would have a material financial impact; however, potential regulatory restrictions imposed by authorities may represent a medium-level risk in the future.	Upstream, own operations	Risk sourced from impact	Short, medium, long
Resource use and circular economy		**Value chain**	**Source**	**Time horizon**
Waste	**Risk -** There is a **significant risk associated** with our operations that may impact soil quality. All operations that could affect soil are regularly monitored and reported. The risk specifically pertains to the 14 lagoons at the Vega Refinery, covering an area of approximately 82,450 m2. These lagoons are waterproofed with layers of compacted soil and bentonite. Currently, the refinery is undergoing a remediation	Upstream, own operations	Risk sourced from impact	Short, medium, long

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Business Conduct		Value chain	Source	Time horizon
Corporate culture	**Opportunity -** A culture that engages and empowers employees and contractors to work with management to safeguard their own health, safety, and well-being and prevent accidents is likely to help maintain financial stability.	Own operations	Opportunity sourced from impact	Short, medium, long
Protection of whistle-blowers	**Opportunity -** KMGI's Protection of Whistle-blowers policy empowers employees, suppliers, clients, and collaborators or any other third party to raise concerns or complaints in good faith. This policy ensures confidentiality and protects individuals from retaliation is likely to help maintain financial stability.	Upstream, own operations	Opportunity sourced from impact	Short, medium, long
Management of relationships with suppliers	**Risk -** There is a low-level risk associated with the management of relationships with suppliers, as KMGI aims to maintain positive relations and avoid supplier loss. Undertakings must effectively balance these priorities to sustain favorable relationships with customers, regulators, and shareholders while ensuring operational efficiency and profitability. In the case where relations are interrupted with a supplier, there are contractual clauses in place to mitigate significant financial impacts.	Upstream, own operations	Risk sourced from dependencies	Medium, Long
Avoiding corruption and bribery	**Risk -** The risk associated with bribery and corruption at KMGI is not significant. Furthermore, the potential reputational risks can lead to the loss of relationships with suppliers. It affects the reputation of KMGI and breaches legal requirements.	Own operations	Risk sourced from impact	Medium, Long

Notes on IROs:E4 – **Biodiversity** – Based on the environmental studies conducted and the permits issued for Rompetrol's operations, no significant impacts on biodiversity have been identified across our own operations or downstream activities. With regard to the value chain, crude oil procurement is through an oil terminal supplied by multiple upstream sources, predominantly located in Kazakhstan. Detailed biodiversity-related information at specific extraction or drilling sites remains limited due to the structure of the supply chain. Our main contractual supplier has not reported any biodiversity loss or related environmental issues associated with the extraction areas of its upstream suppliers. In addition, given the diversified upstream sourcing base and the availability of alternative supply options, no material biodiversity-related risks or opportunities have been identified at this stage.

E5 – Raw Materials - Crude oil represents the Group's primary raw material (feedstock) and is supplied by multiple upstream sources, predominantly originating from Kazakhstan. While the use of crude oil inherently contributes to the depletion of a non-renewable natural resource, this impact is not considered significant at the geographical level of Kazakhstan, given the availability and scale of proven reserves. From a business perspective, sufficient supply availability and diversified sourcing arrangements mitigate potential constraints related to resource scarcity. As a result, no material financial risks or opportunities have been identified in relation to crude oil or other resource inflows. The potential depletion of crude oil resources is not considered material to Rompetrol's operations or strategic outlook. Following internal consultation and the outcomes of the Double Materiality Assessment, this topic has not been identified as a material impact, risk, or opportunity for the Group, given current market conditions, resource availability, and sourcing structure.

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1.5.2 Policies MDR-P – Policies adopted to manage material sustainability matters.

Rompetrol manages material topics through a series of internally approved policies and processes either within each subsidiary or at the Group level, based on the specific subject. These policies and processes might differ based on each company's readiness in terms of sustainability. However, the goal is to implement a structured approach across the entire Group and to develop specific policies and procedures tailored to each material topic.

Some relevant policies are included in the companies ISO management systems and ensure compliance with legal requirements and alignment with international best practices. The policies and necessary actions for each material topic are presented in the sections of the ESRS report.

If there are no adopted policies or actions included in internal documents, the company has stated this and may provide a timeframe in which it intends to adopt them.

1.5.3 Actions MDR-A – Actions and resources in relation to material sustainability matters

The necessary actions for each material topic are presented in the sections of the ESRS report. If applicable, it specifies whether implementing an action plan requires significant operational expenditures (OPEX) and/or significant capital expenditures (CAPEX) under the appendix related to taxonomy, where the amount of current financial resources is provided, and it is explained how these relate to the most relevant values presented in the financial statements.

1.5.4 Metrics MDR-M – Metrics in relation to material sustainability matters

The metrics and targets for significant sustainability aspects are detailed in the statement sections, allocated for each material topic (relevant ESRS subject). If no metrics and targets have been adopted, Rompetrol provides reasons for this and may offer a timeline for their adoption.

1.5.5 Targets MDR-T – Tracking effectiveness of policies and actions through targets

Rompetrol tracks the effectiveness of its actions to address significant impacts, risks, and opportunities through annual performance monitoring and sustainability reporting, including performance on the indicators used for this purpose as presented in the statement section - Information Disclosure Requirements from ESRS covered by the Group's sustainability report.

The performance, indicators, and targets for each material topic (relevant ESRS subject) of Rompetrol are detailed in the ESRS statement sections. If there are no measurable, outcome-oriented, and time-bound targets adopted, the timeline for adoption is presented in the relevant statement sections, including if such targets will not be set and the reasons why the company does not intend to establish them. It is indicated whether and how the effectiveness of policies and actions related to each material topic is monitored.

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Environmental targets Rompetrol Rafinare S.A. and affiliated entities

Indicator	Base year 2022	Actual 2024	Actual 2025	Target 2026	Target 2030	Target 2040	Target 2050
GHG emissions - Scope 1 emissions tCO2	927,010	721,916	1,014,513	-16.7	-12.8	-16.3	-18.4
GHG emissions - Scope 2 (location-based), tCO2	6,563	66,964	228,382	-1	-2%	-5%	-5%
GHG emissions - Scope 2 (market-based), tCO2	-	116,974	149,166	-1%	-2%	-5%	-5%
GHG emissions - Scope 3 emissions tCO2	base year is 2024 restated	16,172.135*	16,511,222				TBD
Energy - Total energy consumption, MWh(RRC)	4,698,263	3,920,718	4,731,141	-1%	-2%	-3%	-3%
Water consumption, million liters (RRC)	2,781	2,515	3,616	-7%	-13%	-21%	-21%
Waste recovery rate, % (RRC)	92%	81%	93%	>90%			
Significant spills	0	0	0	0	0	0	0
Environmental grievances	0	0	0	0	0	0	0

Notes

*2024 Scope 3 restated emissions come from recomputation of category 1 quantity based in line with 2025 approach for comparability and additional category 11 - 4.3m tCO2e from related party transactions, previously excluded.

2022 is the base year for the measurements, our first year with audited Sustainability Statement (however, for Scope 3 the base year shall be 2024 calculations, restated).

In 2024, between March 8 and May 12, General Turnaround was carried out at the Petromidia Refinery, which translates into lower quantities of processed raw materials

2025 total throughput of the Refinery was maintained at a high level in 2025 (5.89 mil.t vs 5.26 mil.t in base year 2022) due to increased market demand and attractive prices, contributing to the optimization of the production unit's economic performance.

Notes on the targets setting:

- It is assumed that no significant increase in CO_2 emissions will occur during the 2026–2050 period. Scope 1 reduction targets for 2026–2030 were calculated based on the five-year business plan, assuming the implementation of energy efficiency measures and the commissioning of the co-processing project starting in 2028. Scope 1 targets for 2040 and 2050 were established considering the implementation of energy efficiency measures, biofuel co-processing, the Green Hydrogen project, and the new SAF unit. For Scope 2, it is assumed that all affiliated entities will source electricity from green power providers. The company is committed to addressing and reducing material Scope 3 CO_2 emissions through value-chain engagement and targeted decarbonization measures (supplier engagement, low-carbon procurement, logistics optimization, and the development of lower-carbon products).
- The company is committed to reducing energy consumption through energy efficiency projects and unit-level optimization, with a particular focus on Petromidia refinery, the Group's largest energy-consuming entity.
- RRC is committed to reducing water consumption and achieving a 21% reduction in raw water use by 2050. To support this target, planned initiatives at Rafinare - the Group's largest water-consuming entity- include a new pump in the reusable water system, a new raw water pumping station at Carasu, replacement of the fire-fighting water main, and upgrades to the potable and raw water distribution pipelines.

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- RRC is committed to maintaining a waste recovery rate above 90%, ensuring that the majority of operational waste is reused, recycled, or recovered. This commitment is aligned with Best Available Techniques (BAT) principles, which emphasize waste minimization, segregation, recycling, and resource efficiency. Waste management practices are regularly monitored, reviewed, and improved to maximize recovery, reduce landfill disposal, and support a circular economy approach.
- The company is committed to achieving zero significant spills, supported by robust monitoring, reporting, and mitigation processes. Continuous improvement measures are implemented to drive a year-over-year reduction in the total volume of spills.
- Spills are defined as unintended or accidental releases of oil, chemicals, fuels, wastewater, or other hazardous or polluting substances arising from operational activities and released into the environment, including land, surface water, groundwater, or air, with the potential to cause environmental harm, health or safety risks, or regulatory non-compliance. Under IOGP guidance, hydrocarbon and chemical spills of 1 barrel (approximately 159 liters) or more must be reported for performance indicators, with further severity categories at 10 and 100 barrels.
- We aim to maintain zero environmental grievances by proactively preventing and addressing environmental impacts related to its operations. Environmental grievances include complaints or concerns raised by external stakeholders regarding issues such as pollution, spills, waste management, emissions, noise, or impacts on land and water. This objective is supported by formal grievance mechanisms, ensuring that all concerns are promptly recorded, investigated, and resolved, alongside ongoing stakeholder engagement, effective environmental management systems, and regular monitoring of environmental performance.

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ENVIRONMENTAL INFORMATION

2 CLIMATE CHANGE

ESRS E1

2.1 Strategic orientation and concepts for climate protection

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

ESRS 2 SBM 3, IRO-1

Risks within Rompetrol operations

The **Rompetrol Rafinare SA and its subsidiaries** (**Rompetrol**) risks are included in the KMGI Group's Risk Profile, which includes the ESG Risk Management process governed by a dedicated procedure. This procedure incorporates climate risk section covering both physical risks (e.g., heatwaves, flooding, storm events) and transition risks (e.g., carbon pricing, regulatory change), assessed using a standardized scoring methodology aligned with ESRS E1. Central to our strategic resilience is an Enterprise Risk Management (ERM) process which offers support in identification, assessment, monitoring and reporting different identified ESG related risks through internal tools and methodologies, aligned with ISO31000.

Material impacts, risks and opportunities

Initiatives to integrate sustainability considerations into existing risk management systems have started, alongside the development of policies and regulations to address climate-related risks. In 2025 all entities in scope have developed ESG risk registers which are capturing material climate risks (physical and transition), other environmental topics, social and governance chapters as well. These risks have been discussed, evaluated with business owners and are at different stages of assessment and development of mitigation actions. Across Rompetrol Rafinare and its affiliates these registers capture around 204 topics which are under monitoring and evaluation. Considering that both internal and external environments are very dynamic, the risk identification, assessment and monitoring is a continuous process that will be performed also in the following years and will be updated and improved on a regular basis according to our procedures.

Rompetrol Rafinare is included in KMGI's strategy, which is focused on decarbonisation measures and transition from being a traditional oil & gas downstream company into a diversified downstream player.

An initial assessment performed on Rompetrol Rafinare and affiliate companies, identified impacts on operations, prompting a more comprehensive analysis to identify and address both physical and transition risks and opportunities.

The double materiality assessment covered a structured process that included: identification and mapping of relevant internal and external stakeholders; an internal workshop with representatives from key operational and functional areas to evaluate each ESRS topic in terms of environmental and social impacts as well as potential financial effects; review and confirmation of previous external stakeholder consultation results; peer analysis within the industry; analysis of strategic corporate documents and relevant sectoral benchmarks and final validation/ approval from the top management. The final list of material topics was determined based on the assessed significance of impacts, risks and opportunities, in line with the ESRS double materiality principles

Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the material climate change IROs from the double materiality analysis conducted.

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Recognizing the climate change risks

A climate risk and vulnerability assessment was conducted for Rompetrol's main production sites—namely, the two refineries in Romania - which represent the core of the Group's operational activities. The analysis also considered aspects across the value chain, including distribution and product use. The purpose of this assessment was to understand the current and future evolution of risk factors that may influence Rompetrol's operations. This assessment was carried out using climate projections within a series of future scenarios, in accordance with an expected lifetime of the activity at these refineries of approximately 25 years.

Future scenarios included several Representative Concentration Pathways (RCPs) established by the Intergovernmental Panel on Climate Change (IPCC), namely **RCP2.6** (the lowest in terms of radiative forcing among the four representative concentration pathways)**, RCP4.5** (Representative Concentration Pathway 4.5 is a scenario that stabilizes radiative forcing at 4.5 Watts per meter squared in the year 2100 without ever exceeding that value), **RCP6.0** (uses a high greenhouse gas emission rate and is a stabilisation scenario where total radiative forcing is stabilised after 2100 by employment of a range of technologies and strategies for reducing greenhouse gas emissions) and **RCP8.5** (refers to the concentration of carbon that delivers global warming at an average of 8.5 watts per square meter across the planet. The RCP 8.5 pathway delivers a temperature increase of about 4.3˚C by 2100, relative to pre-industrial temperatures). These trajectories describe different future climate scenarios, all of which are considered possible based on the volume of greenhouse gases (GHG) in the coming years.

According to the TCFD Handbook, **there are two primary types of climate** risks: risks related to the transition to a lower-carbon economy and risks related to the physical impacts of climate change. Transition risks – regulatory, market, technology, and reputational risks – related to the challenges of transitioning to a low-carbon (or zero-carbon) economy. Physical risks are related to the direct impact of climate change on activity and can be event driven (acute) or longer-term shifts (chronic) in climate patterns.

Physical risks and opportunities

Based on the physical risks (acute or chronic) defined by TCFD, those climate risks that can affect the performance of Rompetrol's economic activity over its anticipated lifespan were identified.

In the analysis, **climate risks and vulnerabilities were evaluated and structured according to the probability and intensity of the impact**. The vulnerability of a Group is a combination of two aspects:

1. Sensitivity - how sensitive are the components of Rompetrol's activity to climate hazards and
2. Exposure - the likelihood that these hazards will occur at the location now and in the future.

These two aspects can be evaluated, in detail, separately or together. Depending on the location of the entities, some of the specific climate hazards may be considered relevant or not in terms of sensitivity analysis. In general, Romania is vulnerable to several natural climatic and geological hazards: floods, landslides, droughts, extreme temperatures, as well as earthquakes. Given that climate change contributes to increased disaster risk, disaster risk management becomes a vital and urgent component.

The climate variables and hazards that were included in the climate vulnerability studies and risk assessments conducted are:

- Droughts & Heatwaves
- Systematic long-term changes in climate patterns
- Estimated sea levels rise
- Cold waves
- Extreme weather
- Wind
- Water stress
- Changes in precipitation, soil moisture and air humidity
- Forest and vegetation fires
- Landslides and earthquakes

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Due to the geographical characteristics of the country analysed – Romania, as well as climate projections, these physical **climate hazards were assessed as medium risks.** While some countermeasures are already in place, there are multiple opportunities for development to combat the increasingly worrying forecasts of the future climate.

Climatic vulnerability was assessed by considering both the exposure and sensitivity of KMGI Group's activities and locations to several climate risk factors. The most notable climate risk factors concluded through the study were landslides, earthquakes flooding and cloudbursts, droughts and heatwaves, and estimated sea level rise.

Vulnerability assessment summary

		Exposure (current + future climate)		
		High	Medium	Low
Sensitivity	High			Forest fires
	Medium		Landslides, Earthquakes	Estimated sea level rise Floods & Cloudbursts
	Low			Changes in average precipitation, soil moisture and air humidity Drought/Heat waves

low	Medium	High

Based on the sensitivity, exposure and vulnerability analyses, there are no significant potential hazards following the measures already implemented on individual sites.

A potential acute risk identified and assessed at the entity level in Rompetrol Rafinare SA relates to hazards such as landslides and earthquakes, which represent concrete manifestations of the broader climate-related physical risk identified at Group level—namely, the potential inability to adequately adapt to evolving climate-related hazards, with possible impacts on the safety and continuity of production processes and potential non-compliance with risk-prevention requirements.

The risk is currently mitigated through measures implemented from the early construction stages of site buildings, where seismic requirements and stability considerations were integrated into the design standards, and by equipping the facilities with appropriate safety and fire-fighting systems. These measures ensure that the physical risk described at entity level is managed in alignment with the Group-level climate procedures.

In **Romania**, the acute risk of forest fires is mitigated by the measures imposed by Law 48/2008 on the sustainable management of forests, which obliges to apply and respect specific fire protection norms, approved by order of the leader of the central public authority responsible for forestry. These measures (emergency procedures, firefighting system, ISU procedures and provisions) reduce the final risk (forest vulnerability to fires) to medium.

Identified physical risks are categorized in both acute and chronic, described and analysed in more detail each entity's ESG Risk Register. Mitigation measures are presented and prepared for each related risk.

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Transition risks and opportunities and potential financial risks

An analysis geared towards evaluating our positioning in relation to transition risks and dissecting how various categories of these risks could potentially affect us was performed. Transition risks examined included regulatory changes, market shifts, technological advancements, supply chain disruptions, financial factors, operational challenges, reputational issues, legal ramifications, and implications for our employees and workforce. We identified carbon pricing, primary energy sources, and the volume of purchased allowances as critical indicators demanding particular attention for our Group.

The estimated financial effects were assessed, resulting from the following scenario analysis performed for transition risks for the short, medium and long terms, for the period between 2023 to 2060:

- NDC (Nationally Determined Contributions) - This action plan aims to reduce emissions and adapt to climate impacts. NDC sets country-specific emissions reduction targets for adapting to climate impacts.
- Below 2C - This scenario assumes a gradual tightening of climate regulation. In this scenario, the likelihood of limiting global warming to 2°C is estimated at 67%.
- Delayed transition - This scenario assumes that annual emissions will not decrease until 2030, followed by a sharp tightening of carbon regulation.
- Net zero - This scenario aims to limit global warming to 1.5°C through stringent climate regulation and achieving net-zero CO2 emissions by approximately 2050.

ESG risk management process is a continuous process subject to ongoing review and improvement.

As per the risk assessment performed, a series of transition risks were identified in relation to our operations:

Risk type	Risk name	Risk description
Regulatory	Non-Compliance with emerging regulatory requirements	Risk of non-compliance with evolving decarbonization laws issued by EU and local governments where the company operates (e.g., CSRD, ETS2, RED III, SAF mandates in Romania).
Strategic	Risk of insufficient strategic and technological adaptation to energy transition and low-carbon innovation requirements	Risk of inability to implement carbon-pricing mechanisms to reduce GHG emissions, shifting energy use toward lower emission sources, adopting energy-efficiency solutions, encouraging greater water efficiency measures, and promoting more sustainable land-use practices.
Strategic	Risk of increased costs for environmental compliance and disruptions standard business operating model	Traditional fossil fuel models are threatened by the development and use of emerging technologies such as: renewable energy, battery storage, energy efficiency, and carbon capture and storage.
Operational	Increased energy consumption with impact in decreasing energy efficiency	Risk of rising energy use within Group's operations, especially in refinery—whether due to aging infrastructure, suboptimal process controls, or delayed upgrades—which results in a decrease of the overall energy efficiency. As energy-intensive units (e.g., distillation columns, hydrocrackers, reformers) consume more fuel or electricity without proportional output gains, the refinery's energy performance may deteriorate. This may lead to process inefficiencies, equipment degradation, regulatory pressure and carbon cost exposure.

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Operational	Risk of climate-related litigation exposure	Recent years have seen an increase in climate-related litigation claims being brought before the courts by property owners, municipalities, states, insurers, shareholders, and public interest organizations. As the value of loss and damage arising from climate change grows, litigation risk is also likely to increase.
Market	Risk of increasing competitiveness energy market from renewables	The increasing demand for economic operators to use energy from renewable sources encourages potential new operators to offer clean energy solutions and challenge traditional players.
Financial	Credit risk from transition to green energy	Risk of decreased creditworthiness resulting from climate transition impacts such as business interruption, property damage, stranded assets, and rising compliance costs. These factors can erode profitability, reduce revenues, and weaken the financial position of affected entities—ultimately increasing the probability of default and exposure to credit losses.

Key climate-related risks and their potential impact on our medium and long-term financial performance are identified, analysed and described in the ESG Risk Register. The purpose of the results and data recorded in the register, regularly reviewed and updated, drives decisions on future capital expenditure and operational directions, ensuring our resilience against climate volatility.

This bottom-up and top-down approach ensures that risks, including political, legal, financial, technological, market and acute climate-related risks, are fully monitored and documented at all levels of our operations. The scope of the risk analyses and assessment is to define and establish specific mitigation and adaptation strategies. These strategies aim to improve operational resilience, protect assets against climate damage and ensure business continuity in the face of climate volatility.

Transitioning to a lower-carbon economy may entail extensive policy, legal, technology, market and reputational changes to address mitigation and adaptation requirements related to climate change. Depending on the nature, speed, and focus of these changes, transition risks may pose varying levels of financial and reputational risk to organizations.

Rompetrol is actively engaging in initiatives that not only address short term risks but also unlock long term value through the development of new products.

Type	**Project**
Hydrogen	Hydrogen production facility
EV charging infrastructure	EV chargers on CNAIR1 (reference period 15 years)
Biofuel	HVO/SAF production unit
Biofuel	Advanced Biodiesel co-processing at Petromidia Plant
Renewable energy	Photovoltaic Projects at Petromidia and Vega Refineries

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2.1.2 Policies

ESRS E1-2

Our KMGI Group ESG and Climate Change Risk Management Policy is designed to guide our actions in a way that aligns with best practices and industry standards, applicable to all Group companies including Rompetrol Rafinare SA and its subsidiaries. This policy outlines our approach for incorporating ESG into our investment process and describes the ESG practices.

We are committed to reducing our climate and environmental impact, promoting social responsibility, and ensuring good governance practices in all aspects of their operations.

Core principles guiding our approach include:

- **Compliance with regulations and standards** We strictly adhere to all relevant environmental regulations and industry standards, striving to surpass these benchmarks whenever feasible to ensure the highest level of environmental protection.
- **Risk management** By identifying, assessing, and managing environmental risks associated with our operations, we've established comprehensive processes to safeguard against potential negative impacts on the environment.
- **Continuous improvement** Our dedication to enhancing environmental performance is evident through regular monitoring, the adoption of new technologies, and the implementation of best practices aimed at reducing our ecological footprint.
- **Stakeholder engagement** We maintain open lines of communication with local communities, environmental groups, and regulators to address concerns, integrate feedback, and foster collaborative efforts towards sustainable environmental practices.
- **Transparency** Rompetrol is committed to clear communication regarding our environmental performance, regularly reporting on our progress towards sustainability goals and informing the public about potential risks and safety measures.

At group level, as well as entity level, within each Rompetrol entity, the management established, implemented policies and rules in the fields of QHSE, security and energy, during the reporting year. The establishment of the policies considered:

- the national and international situation
- suitability to the purpose and context of Rompetrol Rafinare S.A and subsidiaries
- compliance obligations and applicable legislation
- the requirements imposed by the interested parties
- the sustainability requirements for products
- the requirements for evaluating the fulfilment of compliance obligations and the correction of non-conformities
- the necessary resources
- the desired level of satisfaction of the client's requirements
- the nature and types of risks and opportunities identified, to ensure environmental protection and pollution prevention, protection, participation and consultation of workers and ensuring energy efficiency measures
- the opportunities and requirements for continuous improvement of the effectiveness of the implemented system.

Company policies are communicated to all employees and available to interested parties. Policies are reviewed periodically to ensure they remain relevant and appropriate.

There is a policy developed at each company level (QHSE Policy) which promotes the adoption of necessary practices for the identification, evaluation and management of processes and associated risks, as well as the periodic evaluation of environmental aspects, the constant concern regarding the minimization of their impact on the environment and promoting the adoption of sustainability principles in the activity carried out by minimizing their impact on the environment (preventing pollution, reducing emissions, efficient use of resources, efficient waste management, etc.)

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In particular, Rompetrol Rafinare SA has also an Energy Policy, which promotes a responsible attitude towards the environment and supports the concept of sustainable development by improving processes in all fields of activity, including the field of energy management.

2.1.3 Actions

ESRS E1-3

The key actions applied in the reporting year and plan to tackle climate change are presented below. Thus, our transition plan is embedded in and aligned with our overall business strategy and financial planning. As we continue to report in line with the provisions of Commission Delegated Regulation (EU) 2021/2139, we expect our transition to a sustainable economy to evolve over time by rising the amount of funds that are invested in sustainable activities. To support this transition, we are actively tracking our progress and how our activities develop.

A package of **decarbonization projects** was developed to support the transitions to renewable energy production and align with sustainability goals. This package includes the following projects:

- co-processing of biodiesel;
- co-processing of sustainable aviation fuel (SAF);
- green hydrogen;
- biodiesel and SAF production (standalone plant);
- photovoltaic parks;
- carbon capture and storage.

In accordance with the MDR-A, the key actions undertaken during the reporting year, along with plans to address climate change, include the following:

- **Production of Renewable Energy and Biofuels (Biodiesel/Sustainable Aviation Fuel Co-Processing)** Co-processing projects represent the initial phase of our decarbonization strategy. We are actively investigating advanced biodiesel and sustainable aviation fuel (SAF) co-processing solutions at the Petromidia Refinery. To support these efforts, we have contracted two technical solution studies—one focused on advanced biodiesel co-processing and the other on SAF co-processing. Additionally, biodiesel co-processing remains a priority, with an annual throughput of approximately 60,000 tons of feedstock. Co-processing projects are currently the primary focus of our investments in renewable energy and biofuels. These initiatives align with our commitment to delivering value and advancing Romania's sustainability objectives.
- **CCS – Carbon Capture and Storage** The CC-S project is is currently in the assessment phase: the technical and financial viability of implementing carbon capture for Petromidia refinery emission sources and transport routes, while also identifying the most appropriate carbon capture technology for the existing Petromidia
- **Production of Sustainable Aviation Fuel (SAF)** The Feasibility Study for the construction of a Sustainable Aviation Fuel (SAF) and Hydrotreated Vegetable Oil (HVO) production plant has been successfully completed, confirming the technical feasibility and positive economic outlook of the project. The feasibility results demonstrate promising project fundamentals, supporting the investment decision to advance toward the next development phase. The project aligns with EU Renewable Energy Directive (RED III) and ReFuelEU Aviation regulations and will enable Rompetrol to meet the upcoming advanced biofuel blending obligations for both road and aviation sectors.
- **Photovoltaic Projects at Petromidia and Vega Refineries** To enhance energy efficiency and increase the share of renewable energy for self-consumption, the company is evaluating the construction of photovoltaic power plants at both sites. Petromidia Refinery - construction of a 9.4 MW photovoltaic power plant dedicated to self-consumption and Vega Refinery-development of a 4.8 MW photovoltaic park with a battery storage system for self-consumption. Feasibility studies for both projects have been completed, and internal approvals are in progress to advance to the design and implementation phase.

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Significant monetary amounts of CapEx and OpEx required to implement the actions taken or planned are presented in Annex 1 prepared in accordance with EU Taxonomy.

Refining operations - Climate change mitigation actions include:

- GHG emissions management: Implementation of technologies and practices to reduce greenhouse gas (GHG) emissions in own operations and in the value chain
- Emission reduction projects.
  - Energy efficiency improvement initiatives and Capex projects implemented during the general turnaround of the Refinery were:
    - optimization of steam consumption in the stripping and separation columns produced from Catalytic Cracking, Vacuum Distillate Hydrodesulfuration, Gas Fractionation and the propane-propylene separation column in Petrochemicals section;
    - Capex projects with an impact on reducing CO2 emissions: the purchase and installation of new reactors in the vacuum distillate Hydrodesulfurization installation, the transformation of the CO Boiler from a natural circulation boiler to one with forced multiple circulation and the replacement of the drilling/cutting system in the installation of Delayed Coking.

Other general mitigation measures implemented in refining operations are:

- Energy efficiency, by implementing measures to reduce energy consumption, such as upgrading equipment and optimizing production processes.
- Use of energy from renewable sources, by increasing the use of energy from renewable sources, such as solar, wind or hydropower, in the company's operations.
- Other measures include education and awareness such as promoting education and awareness among employees and the community regarding the importance of environmental protection, as well as regular training of all employees with the energy objectives, energy aspects, performance achieved, set targets.

Refining operations - Climate change adaptation actions include:

- **Physical climate risk management:** Developing action plans to deal with the impacts of climate change on infrastructure and operations. In particular, risk assessment related to the location and mitigation actions taken in alignment with applicable legislation.

Rompetrol Downstream (DWS), affiliated company of Rompetrol Rafinare SA - Climate change mitigation actions include:

- GHG emissions management: Implementation of technologies and practices to reduce greenhouse gas (GHG) emissions in own operations and in the value chain, including internal workshops to optimize the CO2 calculation, documenting/reviewing procedures for the correct and complete reporting of emissions to the environmental authorities, and
- Emission reduction projects (CAPEX) and projects for the purchase and installation of electric charging stations, as well as contracts with suppliers of green power.
- Energy efficiency:
  - Energy consumption monitoring, such as keeping records of electricity consumption and optimizing electricity consumption.
  - Installation of photovoltaic panels in 2 fuel distribution stations: Vistea and Mogosoaia and the installation of 44 electric charging stations in 31 stations and planned to install 11 electric stations during the year 2025.
- Use of energy from renewable sources, by increasing the use of energy from renewable sources, such as solar, wind or hydropower, in the company's operations. There are solar energy (photovoltaic panels) in 2 fuel distribution stations: Vistea and Mogosoaia.

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- Other measures include education and awareness such as promoting education and awareness among employees and the community regarding the importance of environmental protection, as well as regular training of all employees with the energy objectives, energy aspects, performance achieved, set targets.
- There is an annual training program and monthly program for consumption efficiency.

Rompetrol Gas - Climate change mitigation actions include:

- GHG emissions management: Implementation of technologies and practices to reduce greenhouse gas (GHG) emissions in own operations and in the value chain, including internal workshops to optimize the CO2 calculation, documenting/reviewing procedures for the correct and complete reporting of emissions to the environmental authorities, and
- Emission reduction projects – capital investments (CAPEX), as well as contracts with suppliers of green power.
- Energy efficiency:
  - Energy consumption monitoring, such as keeping records of electricity consumption and optimizing electricity consumption
- Use of energy from renewable sources, by increasing the use of energy from renewable sources, such as solar, wind or hydropower, in the company's operations.
- Other measures include education and awareness such as promoting education and awareness among employees and the community regarding the importance of environmental protection,

Rompetrol Gas - Climate change adaptation actions include:

- **Physical climate risk management:** Developing action plans to deal with the impacts of climate change on infrastructure and operations. In particular, risk assessment related to the location and mitigation actions taken in alignment with applicable legislation.

For the actions where OPEX/CAPEX or impact on GHG emissions are not disclosed, the initiative is still at an early stage of development, and the detailed design, scope and financial implications have not yet been finalised, preventing the preparation of consistent and reliable quantitative estimates at this point.

2.1.4 Targets

ESRS E1-4

Our Environmental Performance Targets are rooted in a deep understanding of our operational impact and the broader environmental context in which we operate. These targets encompass a broad spectrum of focus areas, including greenhouse gas (GHG) emissions reduction, energy efficiency improvements, waste management optimization, water conservation, and the integration of renewable energy sources into our operations.

Starting from 2030, we will update the base year or the GHG emission reduction targets at five-year intervals.

Rompetrol Rafinare S.A - PEM	2022*	2024	2025	2026	2030	2040	2050	
Scop1: CO2e emissions (t), var. from base year	881,633	688,729	967,872	782,395	-13%	-16%	-18%	1) 2) 3) 4)
Energy Intensity Index	96.25	97.49	92.5	85.90	85.90	85.7	85	
Reduction of energy consumption (GJ/t)	3.38	3.25	3.07	2.99	2.99	2.98	2.95	5)

*2022 is the base year for measurements
1) 2024 General turnaround
2)Target for 2026 was established considering production and utilities Budget for 2026
3)Target for 2030 was established considering implementation of the energy efficiency, co processing biofuels
4)Target for 2040 and 2050 was established considering implementation of the energy efficiency, co-processing biofuels, Green H2 project and New SAF unit
5) At BU level according to Budget forecast (GJ/tons of throughput processed)

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During 2025 operational year we registered an increase of Scop1 CO2 emission by 9% vs 2022 coming mainly from an increased quantity of feedstock processed 5.89 mil. tons in 2025 vs 5.26 mil. tons 2022. The total throughput was maintained at a high level in 2025 due to increased market demand and attractive prices, contributing to the optimization of the production unit's economic performance.

These emission reduction targets are not science-based or compatible with limiting global warming to 1.5°C. They are not derived using a sectoral decarbonisation pathway, but with current legislation applicable to each one of our companies, the targets have not been externally assured.

Subsidiary entities (DWS, Rompetrol Gas) targets are aligned to full compliance with the GHG Protocol (and for Scope 1 where applicable the EU ETS 2 requirements), as well as in terms of monitoring. The targets are to be disclosed in the next reporting cycles.

Rompetrol Gas has submitted its monitoring plans for ETS2, which are to be approved in accordance with the requirements of the National Agency for Environmental Protection and Protected Areas (ANMAP). Draft procedures for ETS2 and sampling plans have also been drawn up and are to be approved after verification by ANMAP. Rompetrol Downstream has drafted the monitoring plans for ETS2, now their stage is to be completed according to the requirements of the National Agency for Environmental Protection.

KMG International Group-wide numerical targets have been established (E1-6). Moreover we have set entity-by-entity targets considering the operational activity of each company and the ESG specificities. When setting critical assumptions for GHG emission reduction targets, we are considering future developments, such as changes in sales volumes, shifts in customer preferences and demand, regulatory factors, and new technologies available at the moment of targets setting.

According to current local (GEO 80/2018 and GEO 163/2022) and EU regulations (REDII 2001/2018 and revised RED III 2413/2023), fuel suppliers are obligated to ensure a supply of renewable energy in the market. This means that by 2030, fuel suppliers must guarantee a minimum share of 29% renewable energy or a reduction of at least 14.5% in greenhouse gas intensity in the transport sector.

Fuel suppliers shall ensure that the energy value derived from the quantity of renewable fuels of non-biological origin ("RFNBO" or green hydrogen) supplied to the market in Romania and used in the transport sector over the period of one year is at least 5.5% of the energy content of all fuels supplied for consumption or use on the market starting with 2030. For RRC, this requirement will result in the consumption or supply of advanced biofuels and green hydrogen.

Failure to meet these targets will result in fines of at least USD 6.8 per kilogram for each unrealized megajoule (MJ) of green hydrogen and the purchase of green hydrogen certificates.

The targets for the energy efficiency indicators that directly influence CO2 emissions, these were established for the next 5 years, taking into account the operation of the installations provided for in the 2026-2030 budget exercise as well as the commissioning of the Cogeneration installation in 2025 (to be operated by Rompetrol Energy – a KMGI company).

Energy efficiency indicators - Targets	UM	2026	2027	2028	2029	2030
BU Refining Energy Indicator	GJ/tons of throughput processed	2.99	2.99	3.04	2.99	2.99
Energy Intensity Index (EII) for Petromidia Refinery	% (Actual energy in GJ/ Standard energy in GJ)	85.90	85.76	87.57	87.12	85.90
Energy Consumptions in Petromidia Refinery	GJ/tons of throughput processed	2.74	2.75	2.81	2.77	2.77
Energy index for polymers (EIP)	GJ/tons of polymers production	17.30	17.39	16.55	16.32	16.38
Energy Consumptions in Vega Refinery	GJ/tons of throughput processed	2.28	2.19	2.28	2.18	2.26

*2028 General turnaround -55days of total shutdown

**Target for 2026 was established considering production and utilities Budget for 2026

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2.1.5 Transition Plan

ESRS E1-1

Rompetrol's transition plan, designed to mitigate climate change and support the Paris Agreement's climate neutrality goal, is currently in progress and set for completion in 2026-2027, in line with the evolving legislation. In the meantime, we have successfully initiated projects and activities under our Decarbonization Plan, as outlined below.

A preliminary assessment of CO_2 emissions has been conducted as part of our decarbonisation planning process, based on the feasibility studies currently available. These assessments have been taken into consideration when estimating the potential future emission reductions and in defining the targets presented in this report. However, it should be noted that the current emission reduction targets have not yet been validated as Science-Based Targets (SBTi).

The Group is assessing the requirements and methodology for alignment with internationally recognised frameworks, including the Science Based Targets initiative, with a view to strengthening the robustness and credibility of its decarbonisation pathway over time.

❖ **The co-processing of biodiesel initiatives**

This project aims to align with the requirements for renewable energy. Fuel suppliers, besides blending requirements of biofuels, must comply with advanced biofuel quotas, which state that the combined energy share of advanced biofuels and biogas produced from advanced renewable bio-feedstock should be at least 1% by 2025 and 5.5% by 2030, of which at least 1% must be renewable fuels of non-biological origin from the overall energy content.

Name	Unit	2025	2026	2027	2028	2029	2030
Advanced biofuel mandate	%	1%	1%	1%	1%	1%	5.5%
of which RFNBO minimum							1%

The aim of the project is to upgrade the existing Diesel Hydrotreater Unit to co-process renewable feedstock within current operations. This modification will enable the production of 5-10% renewable diesel in the Diesel Hydrotreater Unit, thereby ensuring compliance with the renewable energy advanced biofuels mandate, transitioning to sustainable fuel production, and gaining profits from biodiesel production.

The co-processing of biodiesel project includes two phases of implementation.

- **Phase I**: Solution Study.

Following the completion of *Phase I - Solution Study*, an extensive engineering evaluation was conducted to assess the feasibility of co-processing renewable feedstock within the existing Diesel Hydrotreater. The study confirmed that co-processing up to 7 vol% of pre-treated renewable feedstock is feasible within the current configuration, requiring only minor equipment adaptations. Results indicate that the unit can achieve all EN 590 diesel product specifications and sustain the catalyst cycle, with limited adjustments to the equipment. Overall, the technical feasibility study has been validated, confirming that renewable feedstock can be successfully incorporated into the existing operations with minimal modifications.

- **Phase II**: Implementation

More detailed information on the implementation of the unit modification will be available following the completion of the engineering studies and the subsequent approval of the project by the Investment Committee. The estimated timeline for the completion of Phase II will likewise be defined after the engineering studies are finalized and the project receives Investment Committee approval. The biodiesel co-processing project is expected to generate additional cost efficiencies compared to the procurement of first- and second-generation biodiesel, while also supporting regulatory compliance by avoiding potential penalties, meeting advanced biofuel mandates, contributing to biodiesel blending requirements and renewable energy share targets, and facilitating the transition toward more sustainable fuel production practices.

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❖ Co-processing Sustainable Aviation Fuel (SAF)

As per the ReFuelEU Aviation regulations, the aviation fuel suppliers are required to ensure that all fuel made available to aircraft operators at EU airports contains a minimum share of Sustainable Aviation Fuel (SAF). This means that the aviation fuel suppliers must guarantee a minimum share of SAF at 2% starting from 2025 and progressively increase the minimum shares of SAF every 5-year period until 2050, reaching 70% of SAF shares. Additionally, starting in 2030, aviation fuel suppliers must ensure synthetic sustainable aviation fuel to aircraft operators.

Name	Unit	2025	2030	2035	2040	2045	2050
SAF mandates	%	2%	6%	20%	34%	42%	70%
of which synthetic SAF			2%	5%	10%	15%	35%

**synthetic SAF volume calculation may change upwards when the calculation algorithms for shares are clarified by the EU Commission*

The Co-processing of SAF project analyzes the possibility to produce 5% SAF in the Kerosene Hydrotreater Unit, support transitioning to sustainable fuel production, and gaining profits from SAF production.

The Sustainable Aviation Fuel (SAF) co-processing project is structured into two main implementation phases.

Phase I: Solution Study

Following the completion of Phase I – Solution Study, a comprehensive engineering assessment was carried out to evaluate the technical feasibility of co-processing renewable feedstock within the existing Kero Hydrotreater Unit. The study confirmed the feasibility of co-processing up to 5 vol% pre-treated used cooking oil (UCO) feedstock to produce renewable kerosene fully compliant with ASTM D1655 and DEF STAN 91-091 specifications. The engineering evaluation further demonstrated that all major process equipment is technically suitable and capable of operating under the revised operating conditions, requiring only minor modifications. Overall, the study concluded that the existing unit can accommodate SAF co-processing with limited capital investment, thereby enabling compliance with the ReFuelEU Aviation blending mandates through 2030 and supporting the company's transition toward more sustainable fuel production.

Phase II: Implementation

More detailed information regarding the implementation of the unit modifications will be available upon completion of the detailed engineering studies and following approval of the project by the Investment Committee. The SAF co-processing project is expected to deliver multiple strategic and financial benefits, including cost efficiencies associated with in-house SAF production and distribution, avoidance of potential regulatory penalties, compliance with SAF blending mandates, contributions to renewable energy share requirements and biofuel obligations, and broader support for the company's transition toward sustainable fuel production practices.

❖ Green Hydrogen

In July 2023, the Romanian Parliament adopted Law No. 237/2023 on hydrogen (the "Hydrogen Law"), which establishes a national regulatory framework for the production, transport, storage and use of hydrogen, with a focus on hydrogen from renewable and low-carbon sources. The law introduces obligations for the gradual integration of hydrogen into industrial processes and the transport sector as well as the minimum shares of renewable hydrogen in the fuels placed on the Romanian market by fuel suppliers, in line with the long-term decarbonisation objectives of the European Union.

On 21 October 2025, Romania approved its new National Hydrogen Strategy, originally developed in 2023, which sets indicative deployment pathways and sectoral targets for the uptake of hydrogen. The Strategy foresees that the use of green hydrogen in refining activities for conventional transport fuels should account for approximately 1% of total transport energy consumption by 2030. For Rompetrol Rafinare, this would translate into an estimated consumption of around 11 kt of green hydrogen as an intermediate input in the production and supply of conventional fuels to the Romanian market.

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At present, certain quantitative provisions of the National Hydrogen Strategy are not fully aligned with the existing Hydrogen Law, while they are broadly consistent with the revised Renewable Energy Directive (EU) 2023/2413 ("RED III"), which was adopted and published in November 2025 and introduces updated EU-wide targets for renewable fuels of non-biological origin (RFNBOs), including renewable hydrogen. In this context, it is expected that the Hydrogen Law will be amended to align national hydrogen mandates with the RED III framework, including a recalibration of target levels and a potential deferral of binding implementation timelines to reflect market readiness, infrastructure availability and the pace of regulatory harmonisation at EU level.

Rompetrol is advancing its green transition program and is evaluating a strategic shift from conventional grey hydrogen toward the use of green hydrogen. Green hydrogen is envisaged to be deployed as an intermediate input in the production of conventional fuels, contributing to the decarbonisation of refining operations and supporting compliance with emerging EU regulatory requirements.

The project is expected to be developed in partnership with a specialized developer, investor or industrial partner, responsible for the design, financing, construction and operation of an electrolyser facility to be located on or in close proximity to the Petromidia Refinery. The green hydrogen produced would be supplied to the refinery via a dedicated pipeline. Electricity for the electrolyser is intended to be secured through a long-term Power Purchase Agreement (PPA) with a renewable energy provider, potentially sourced from wind, solar and/or hydro generation.

Rompetrol Rafinare would support the project by providing the necessary land, process water, and access to existing utilities and grid connections, as well as facilitating the integration of the hydrogen supply into refinery operations. This collaborative project structure is designed to optimise capital efficiency, mitigate development risks and accelerate the deployment of green hydrogen within the company's refining value chain.

The project is expected to ensure compliance with the 1% RFNBO mandate required as per REDIII and the National Hydrogen Strategy.

The project is currently in the development stage, focusing on completing the necessary steps to advance to the Final Investment Decision (FID) phase. Progress remains dependent on the forthcoming implementation of the RED III Directive in Romania, expected in November 2025, as the legal and regulatory framework is not yet fully defined.

Project impact in reduction of CO2 emission is estimated to be 80 kt CO2e considering Scope 1 and Scope 2 emission and assuring compliance with the 1% RFNBO mandate required by the Hydrogen Law.

- **SAF Standalone production plant**

The Feasibility Study for the development of a Sustainable Aviation Fuel (SAF) and Hydrotreated Vegetable Oil (HVO) production facility has been successfully completed, confirming both the technical feasibility and the positive economic fundamentals of the project.

The study assessed multiple capacity scenarios and technology configurations and validated the development of a stand-alone HEFA (Hydroprocessed Esters and Fatty Acids) plant to be located at the Petromidia Refinery. The recommended configuration enables flexible production of renewable diesel (HVO) and sustainable aviation fuel (SAF), allowing output to be adjusted in response to market demand, regulatory developments and blending mandates. The proposed project design integrates dedicated feedstock pre-treatment, hydrotreatment, isomerisation and product fractionation units, ensuring full compliance with EN 590, ASTM D1655 and DEF STAN 91-091 fuel specifications. The plant will be interconnected with the refinery's existing utilities and hydrogen network, supporting high operational efficiency, reliability and synergies with current refining operations.

The feasibility study results demonstrate strong project fundamentals and provide a sound basis for progressing toward the next development phase. The project is aligned with the requirements of the EU Renewable Energy Directive (RED III) and the ReFuelEU Aviation Regulation and will enable Rompetrol to meet forthcoming advanced biofuel blending obligations for both the road transport and aviation sectors.

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In parallel, Rompetrol is developing a sustainable feedstock sourcing strategy focused on waste-based lipids and low indirect land-use change (low-ILUC) energy crops, such as Camelina sativa and Carinata, cultivated in cooperation with local farmers and vegetable oil producers. These initiatives are intended to secure diversified, traceable and sustainable supply chains, minimize environmental impacts and support regional agricultural development.

Through this project, Rompetrol is strengthening its position as a regional contributor to Europe's decarbonisation objectives, expanding its product portfolio with advanced renewable fuels that support cleaner mobility and the long-term energy transition.

❖ **Photovoltaic Projects at Petromidia and Vega Refineries**

Rompetrol Rafinare S.A. (operator of the Petromidia and Vega refineries) is addressing rising electricity costs and aligning with EU and national CO_2 reduction targets. To enhance energy efficiency and increase the share of renewable energy for self-consumption, the company is evaluating the construction of photovoltaic power plants at both sites.

Proposed Projects:

- Petromidia Refinery: Construction of a 9.4 MW photovoltaic power plant dedicated to self-consumption. The project is expected to generate approximately 9,845 MWh/year, covering part of the refinery's electricity demand and reducing CO_2 emissions by around 6,000t/year.
- Vega Refinery: Development of a 4.8 MW photovoltaic park with a battery storage system for self-consumption, producing an estimated 6,271 MWh/year and cutting CO_2 emissions by approximately 3,800t/ year.

Feasibility studies for both projects have been completed, and internal approvals are in progress to advance to the design and implementation phase.

- Both projects were in the procedure of obtaining the regulatory act issued by the competent authority for environmental protection. The Prahova County Environmental Directorate issued the Decision of the Framing Stage, for the project to be implemented in the Vega refinery, on 24.11.2025. For the project to be implemented in the Petromidia refinery, the issuance of the Decision of the Framing Stage is expected.

❖ **Carbon Capture and Storage**

The European Union is tightening its carbon regulations by planning a gradual phase-out of free CO_2 emission allowances under the EU ETS, increasing pressure on emitters to adopt carbon capture and low-emission technologies. As a result, KMGI is evaluating the development of a Carbon Capture and Storage (CCS) project aimed at reducing CO_2 emissions from the refining sources. The project is currently in the assessment phase: the technical and financial viability of implementing carbon capture for Petromidia Refinery emission sources and transport routes, while also identifying the most appropriate carbon capture technology for the existing Petromidia infrastructure (e.g. amine-based, membrane separation).

In this respect, a carbon capture pre-feasibility study tender was launched this year, and the study is expected to be delivered in the first half of 2026.

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A series of investments in particular in refining are planned and include also multiple measures to reduce emissions through optimization, energy efficiency, new equipment and infrastructure.

Refining CAPEX Program, Mil USD	2026	2027	2028	2029	2030	2026-2030
Authorization for equipment	26.20	3.98	16.62	3.98	7.06	**57.83**
Catalyst	1.09	4.38	14.73	3.03	5.92	**29.15**
Dynamic equipment rehabilitation	1.91	1.87	3.39	7.69	7.80	**22.67**
Energy efficiency and utilities consumption optimization	1.76	3.68	0.49	0.59	0.65	**7.17**
Environmental compliance	2.66	1.56	1.00	0.70	2.58	**8.51**
Equipment and Infrastructure	1.02	1.20	1.40	4.01	3.13	**10.75**
Power System Rehabilitation	5.39	4.95	5.32	3.59	5.56	**24.81**
Process Optimization Systems	0.49	0.35	0.40	0.20	0.90	**2.34**
Production Process Optimization	16.14	4.73	7.17	7.09	15.39	**50.52**
Rehabilitation of civil infrastructure	0.14	1.22	0.40	0.50	1.62	**3.88**
Safety and Security projects	5.29	6.47	4.72	10.72	7.59	**34.79**
Shutdown & turnaround	26.06	2.68	47.43	1.50	28.93	**106.59**
Static equipment rehabilitation	2.22	0.50	1.00	1.07	2.49	**7.29**
Supply and delivery debottleneck	4.97	6.03	1.49	8.84	3.53	**24.86**
Tank Farm Rehabilitation	9.53	7.55	5.39	8.53	28.23	**59.23**
Urgent capital maintenance works	1.00	1.00	6.94	1.00	1.00	**10.94**
Grand total (million USD)	**105.9**	**52.1**	**117.9**	**63.0**	**122.4**	**461.3**

* a total of USD 461.3 million has been allocated to the Refining Business Unit for the 2026–2030 period, in line with refinery-level operational priorities and strategic objectives.

EU Taxonomy Regulation

As set out in Annexes 1-5 to Commission Delegated Regulation (EU) 2020/852 the reporting undertaking (**Rompetrol**) should present a consolidated CAPEX plan that should include the list of taxonomy-eligible economic activities in 2025 and should provide information on the planned Capex for their financing with the aim of increasing sustainability over the next 5 years. The CAPEX plan for eligible activities should be based on the most recent business plan approved by management, while the time horizon reflects the five-year period for a Capex plan. Planned Capex may be subject to revisions and changes. The CAPEX plan has been prepared to align eligible activities identified. **See Annex 1 for full EU Taxonomy Reporting.**

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2.2 Energy and emissions

2.2.1 Energy consumption & mix

ESRS E1-5

Energy consumption from conventional sources can have a notably adverse impact, with energy production being a major contributor to climate change. In the realm of crude oil refining, both the quantity and origin of consumed energy can significantly influence economic outcomes, as energy costs constitute a large portion of the operational expenses for refineries. Rising energy prices can elevate the higher production cost for petroleum products, potentially leading to higher prices for consumers. Moreover, energy consumption is subject to energy policies and regulations, which can further affect business costs.

Furthermore, the total energy consumption registered in 2025 was 4,742,994MWh out of which 3,214,712 MWh of energy (IPCC conversion factor used) are generated internally from non-renewable resources. The table shows the total energy consumption in energy intensity of net revenue for activities in high climate impact sectors:

The energy intensity (total energy consumption per net revenue) associated with activities in high climate impact sectors in which we operate are presented below. Information on energy intensity is obtained only from total energy consumption and net revenue from activities in economic sectors with a high climate impact. [3], **sectors with high** [4]**.** Those sectors are presented in sections A - H and L from Annex I to Regulation (CE) no. 1893/2006 of European Parlament and Council[3], sectors with a high climate impact.

Rompetrol's activity in O&G and petrochemicals (refining and sale) are identified as ESRS sectors with significant climate impact, used to determine energy intensity. The table below presents the portion of net revenue that relates to activities classified as high-climate-impact:

Net revenue from activities in high climate impact sectors used to calculate energy intensity	4,404,155,168 USD (net, consolidated RRC & affiliates)
Net revenue (other)	0
Total net revenue (Financial statements)	4,404,155,168 USD

Energy production from non-renewable sources and from renewable sources in MWh

Energy production from non-renewable sources (refinery fuel gas production, coke on catalyst, low calorific gases from pressure swing adsorption (MWh)	3,214,712
Energy production from renewable sources (MWh)	0

2025 - Energy intensity is calculated as total energy consumption divided by net turnover, providing an indication of energy efficiency relative to economic output.

Energy intensity = 0.001077 MWh/USD

Also expressed as MWh per million USD revenue

0.001077×1,000,000=1,077 MWh / million USD

(the functional currency of Rompetrol is USD; as of Dec. 31, 2025, closing rate of the National Bank of Romania - 1 USD = 0.852 EUR)

[3] https://eur-lex.europa.eu/legal-content/RO/TXT/?uri=CELEX%3A32022R1288

[4] https://ec.europa.eu/competition/mergers/cases/index/nace_all.html

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Correction: In 2024 the energy intensity per net revenue, using the same computation method was: 0.001052 MWh/ USD (net revenue in 2024 was 3,724,825,212 USD) or 1,052 MWh per USD million revenue.

(As of December 31, 2024, closing rate National Bank of Romania – 1 USD= 4.7768 RON; 1 EURO =1,0389 USD)

The table below shows total energy consumption in MWh and the breakdown by various categories in connection with Rompetrol Rafinare S.A. operations.

Energy consumption mix	Unit	2022	2024	2025
(1) Fuel consumption from coal and coal products	MWh	-	-	-
(2) Fuel consumption from crude oil and petroleum products	MWh	3,070,883	2,473,005	3,214,712
(3) Fuel consumption from natural gas	MWh	488,182	454,898	506,685
(4) Fuel consumption from other fossil sources	MWh	-	-	-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	687,226	642,201	588,494
(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)	MWh	4,246,291	3,570,104	4,309,891
Share of fossil sources in total energy consumption	%	90%	91%	91%
(7) Consumption from nuclear sources	MWh	36,681	50,389	2,226
Share of consumption from nuclear sources in total energy consumption	%	1%	1%	0%
(8) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0	0	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	415,291	300,225	430,877
(10) Energy consumption from renewable sources other than self-produced fuels	MWh	-	-	-
(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)	MWh	**415,291**	**300,225**	**430,877**
Share of renewable sources in total energy consumption	%	**9%**	**8%**	**9%**
Total energy consumption (calculated as the sum of lines 6, and 11)	MWh	**4,698,263**	**3,920,718**	**4,742,994**

Note:

(2) Fuel consumption from crude oil and petroleum products (MWh) - consist in refinery fuel gas, coke on catalyst, low calorific gases from pressure swing adsorption (PSA), quantities calculated on daily basis in metric tons in mass balance of Petromidia Refinery; transformed in MWh with following calorific value: a) refinery fuel gas - on line analysis, annual average value for 2025 being 41.75 GJ/ton * 0.277778 = MWh

b) coke on catalyst - 37.7 GJ/tons * 0.277778 = MWh

c) pressure swing adsorption (PSA) low calorific value gases- 26.37 GJ/tons * 0.277778 = MWh

(3) Fuel consumption from natural gas (MWh) - natural gas acquisition for energetic purpose (the invoices are in MWh) from OMV Petrom supplier

(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh) - consist in steam acquisition from Rompetrol energy supplier (in Gcal) + power acquisition in 2025 using the power label (fossil-nuclear) componence % from Hidroelectrica 2024

(7) Consumption from nuclear sources (MWh) - power acquisition in 2025 using the label nuclear component % from Hidroelectrica 2024

(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh) - power acquisition in 2025 using the power label renewable component % from Hidroelectrica 2024

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Refining operations - breakdown

In 2025, the total energy consumption recorded at the Refinery BU level (PEM, RPP, Vega) was 4.74 million MWh, 21% higher than the energy consumption recorded in 2024 (3.92 million MWh), being strongly influenced by operating days of the two refineries, the degree of loading of the installations as well as the operation of the installations in the Petrochemical area. We mention that in 2025 total throughput of the Refinery was higher with 1.3 mil tons (27%) vs 2024, when between March and May 2024 period, the installations on the platform were stopped for the planned general revision. The distribution of energy consumption is as follows:

- Petromidia Refinery: 4.10 million MWh ~ 87%
- Petrochemical area: 0.39 million MWh ~ 8%
- Vega Refinery: 0.25 million MWh ~ 5%

At the level of BU Refining there are more energy efficiency indicators, monitored on daily basis:

BU Refining Energy is a compressive indicator which shows the energy performance at the integrate level for PEM, Vega & RPP area. For 2025 it was achieved 3.07 GJ/t of total throughput, the lowest value achieved for this indicator

BU Refining Energy indicator formula = (PEM Energy consumption + Vega Energy consumption+ RPP Energy Consumption)/ (PEM Total Throughput+ Vega Total Throughput + RPP Total Throughput)

Energy Intensity Index (EII) for PEM Refinery shows how efficiently the Refinery utilizes energy and is equal with Actual Energy Consumption in GJ/day divided by Standard Energy in GJ/day multiplied by 100.

The year began with an EII of 94.0% in January and moved slightly lower to 93.5% in February, indicating early positive momentum. Although March recorded a temporary increase to 96.2%, April saw a notable improvement in energy efficiency, reaching 90.02%, one of the strongest results of the year. In May, an unplanned power interruption led to an EII of 93.66%, while June achieved the best performance of 2025 with an EII of 88.37%, demonstrating the refinery's strong capability to optimize energy use even under shifting operating conditions. During the summer months, July and August maintained stable levels of 93.85% and 94.90%, reflecting consistent operational efforts despite scheduled and unscheduled unit interventions. September's EII of 91.82% mirrored adjustments related to crude supply, and October held steady at 93.98% during a period of major unit maintenance activities in the MHC and FCC. In winter months November and December, the lowest EII for winter seasons 91.47% and 88.65% was mainly driven by the high charge of the units.

Overall, the year-to-date average EII of 92.5% highlights the refinery's continued focus on energy efficiency, showing resilience and adaptability throughout a dynamic operational year. Actual energy (GJ/day)– Σ (Steam consumption, Steam production, Fuel gas consumption, Power consumption, Coke on catalyst & flue gases from FH2) for units and Off sites area.

Standard energy (GJ/day)– Σ Standard energy for all units (Unit Capacity x Utilization x EII factor*) + Off Sites & Utilities Energy, where*EII factor - may either be a constant factor or a result of several variables describing the unit' feedstock and operating conditions and Off sites & Utilities energy; is a linear function of daily net throughput and complexity.

Energy Consumptions in Petromidia Refinery, GJ/t of throughput –Ratio between Total Energy Consumption and Refinery Total throughput – in 2025 the Energy Consumption was 2.85 GJ/t of throughput.

Energy index for polymers (EIP) –EIP shows how efficiently the Petrochemicals area utilizes energy and is equal with Actual Energy Consumption in GJ/day divided by total yield (polymer and propylene polymer grade) – for 2025 the Energy Index was 20.74 GJ/t of polymers productions being influenced by units' operation.

Energy Consumptions in Vega Refinery, GJ/t of throughput –Ratio between Total Energy Consumption and Refinery net Input – for 2025 the achieved value was 2.42GJ/t of throughput, being influenced by refinery operation.

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Rompetrol Downstream operations

In 2025, the total energy consumption recorded at the level of Rompetrol Downstream SRL was 32,457.13MWh

Rompetrol Gas operations

In 2025, the total energy consumption recorded at the level of Rompetrol Gas SRL was 1,147.06 MWh.

Rompetrol Quality Control

In 2025, the total energy consumption recorded at the level of Rompetrol Quality Control was 268.83MWh

In 2025, the total energy consumption of Rompetrol Rafinare and its affiliates amounted to 4,776,867 MWh. The largest share was recorded by Rompetrol Rafinare, with 4,742,994 MWh, of which 436,508 MWh represents electricity consumption.

2025 Energy consumption mix	Unit	Rompetrol Rafinare SA	Rompetrol Downstream	Rompetrol Gas	Rompetrol Quality Control	Total RRC & affiliates
(1) Fuel consumption from coal and coal products	MWh	-				-
(2) Fuel consumption from crude oil and petroleum products	MWh	3,214,712				3,214,712
(3) Fuel consumption from natural gas	MWh	506.685				506.685
(4) Fuel consumption from other fossil sources	MWh	-				-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	588,494	11,146	8.947	2.097	599,651
(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)	MWh	4,309,891	11,146	8.947	2.097	4,321,049
Share of fossil sources in total energy consumption	%	90.9%	34%	1%	1%	90.5%
(7) Consumption from nuclear sources	MWh	2,226	8,333	5.850	1.371	10,566
Share of consumption from nuclear sources in total energy consumption (%)	%	0%	26%	1%	1%	0%
(8) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	-				
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	MWh	430,877	12,978.02	1,132.263	265.360	445,252
(10) Energy consumption from renewable sources other than self-produced fuels	MWh	-				
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	MWh	430,877	12,978.021	1,132.263	265.360	445,252
Share of renewable sources in total energy consumption	%	9%	40%	99%	99%	9%
Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)	MWh	4,742,994	32,457	1,147.060	268.828	4,776,867

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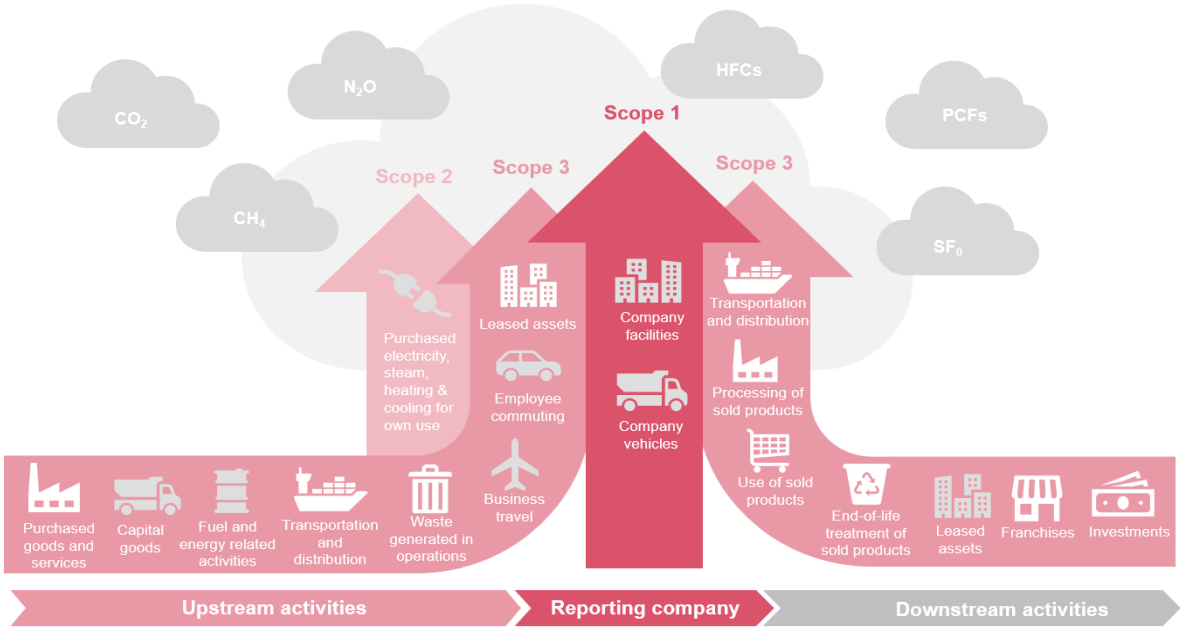
2.2.2 Gross Scopes 1, 2, 3 and Total GHG emissions GHG Intensity based on net revenue

ESRS E1-6

The carbon footprint presented in this Statement represents the total greenhouse gas (GHG) emissions caused by our Company during the financial year 2025, expressed as carbon dioxide equivalent. The Greenhouse Gas Protocol (GHG Protocol) defines three emission scopes:



- Scope 1 emissions are direct emissions from owned and controlled sources. In other words, emissions released into the atmosphere as a direct result of a set of activities.
- Scope 2 emissions are indirect emissions from the generation of purchased energy, such as purchased electricity and steam.
- Scope 3 emissions are all indirect emissions – not included in scope 2 – that occur in the value chain of the reporting company, including both upstream and downstream emissions. In other words, emissions that are linked to our operations.

The carbon footprint embodies the total volume of greenhouse gas (GHG) emissions generated along the value chain. This quantification method primarily relies on calculation rather than direct measurement. GHG emissions are computed by multiplying activity data or spending with an emission factor. The GHG Protocol methodology was used to calculate Scope 1 (in addition to EU ETS), 2 and 3 generated emissions, for both market and location-based emissions.

The data for GHG emissions related to the ESRS Statement correspond to the date of the general-purpose financial statements, financial year 2025. **Significant Scope 3 categories were included in the computation of Scope 3 emissions.**

METHODOLOGY for Carbon footprint

Greenhouse gas emissions of Rompetrol Rafinare SA include emissions that are directly caused by our own activity as well as the emissions generated along the value chain that are material and controlled by Rompetrol Rafinare.

Emissions from ETS installations - Scope 1 statutory reporting and auditing requirement.

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The two KMGI refineries fall under the provisions of HG 907/2025 regarding the establishment of the commercialization scheme of GHG emissions certificates, with subsequent amendments and additions, must draw up, annually, a GHG emissions monitoring report. In accordance with the harmonized requirements provided for in Regulation (EU) no. 2066/2018 for the ETS Directive 2003/87/EC, which provides (among others):

- the obligation to verify and validate greenhouse gas emissions and to report the emissions to competent authority by March 31

The European Directive on Emission Trading Scheme (Directive 2003/87/EC) applies to energy activities (burning fuels for energy purposes, oil refining), production and transformation of ferrous and nonferrous metals, mineral products industry, paper industry, chemical industry, capture, transport and storage of GHG and air transport.

GHG Protocol

The GHG Protocol was employed for estimating other emissions along the value chain and provides the most widely used accounting (emissions calculation) standards for greenhouse gases in the world (https://ghgprotocol.org/about-us), including a number of calculation tools. Guidance documents include one or more approaches for determining CO_2 and other GHG emissions, e.g., direct measurement, mass balance, etc. The calculation tools are available on the GHG Protocol website and are meant to complement the Protocol and make calculations easier, but their use is not mandatory (https://ghgprotocol.org/calculation-tools).

The GHG Protocol did not set a “one size fits all” materiality threshold, material emissions (sources) are according to sector activities (see draft ESRS – sector guidance for example) or site specific knowledge. GHG Protocol has provided Excel based calculation tools on its website for any organization to download and use free of charge. These tools use widely accepted emission factors for both cross sector and sector specific emission sources in corporate GHG inventories. These are default factors, other (better) factors may be used based on site specific knowledge.

The inventory of GHG emissions includes all relevant companies and activities selected based on operational control criterion 100% operated by Rompetrol Rafinare SA and subsidiaries.

Rompetrol Refinery SA operates two refineries - Petromidia Refinery in Năvodari, Constanța, together with the only petrochemical division of the country, and Vega Refinery in Ploiești, Prahova, which keeps the local refining industry at high standards. The office building – where multiple Group subsidiaries are also located, is included in the reporting boundaries. Their emissions are not metered separately; therefore, their emissions were calculated together.

* Rompetrol Petrochemicals exists as a legal entity, but all its activities have been integrated into Rompetrol Rafinare.

Headquarters	Office activities
Rompetrol industrial entities	Manufacturing of products from crude oil
Petromidia Refinery	Refinery of petroleum products and petrochemicals
Vega Refinery	Refinery of petroleum products
Rompetrol service entities	Various support services
Rompetrol Quality Control SRL	Laboratory Activities
Rompetrol Logistics SRL	Logistics for refinery products (no significant emission intensive activities)
Rompetrol Downstream	Warehouse and Fuel distribution stations
Rompetrol Gas SRL	Wholesale of LPG

The **Rompetrol boundaries** for calculating GHG emissions have been established on a materiality basis following internal consultation with representatives from potentially material entities and particularly for Scope 3, a **significance assessment to identify relevant categories was performed**. For scope 3 emissions, the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011) was used for establishing relevance.

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The Scope 3 significance assessment resulted in the following categories being considered relevant for Rompetrol entities within the reporting boundaries:

Significant Scope 3 category	Reason for significance
1: Purchased goods and services	Large volumes of purchases, over USD 500,000 per supplier
2: Capital goods	Large volumes of capital goods
3: Fuel-and-energy-related activities (not included in Scope 1 or 2)	Large volumes of natural gas purchased
4: Upstream transportation and distribution	Large volumes
5: Waste generated in operations	Significant based on tonnage
6: Business travel	Relevant to the influence on potential emission reduction
7: Employee commuting	Relevant to the influence on potential emission reduction
9: Downstream transportation and distribution	Relevant for downstream activities
10: Processing of sold products	Large volumes of products sold to B2B clients for their processes
11: Use of sold products	Large volumes of sold products (Fuel products)
12: End of life treatment of sold products	Significant for Rompetrol Rafinare SA products

Scope 3 input data for calculations consisted mostly in volume based or spent based calculations from Rompetrol data and published emission factors. Regarding the emission factors, only for purchased bioethanol, biodiesel and MTBE products, we received information regarding the emission factor from the supplier. For the rest of the purchases and other categories, we used emission factors from available databases (IPCC, US EPA, DEFRA UK).

The Scope 3 significance assessment resulted in the following categories not being considered significant:

Scope 3 category	Reason for exclusion
8: Upstream leased assets	Not applicable, no upstream leased assets
13: Downstream leased assets	Not applicable, no downstream leased assets
14: Franchises	All franchise relevant (emission intensive) activities included in category 11 – use of sold product
15: Investments	Not relevant, no material JVs under operational control

Materiality for emissions: within the categories defined by the GHG Protocol, those with an estimated weight of less than 1% have been excluded, provided that the sum of all of them does not exceed 5%.

Double reporting was removed by setting consolidated reporting boundaries for Scope 1, 2, and 3 emissions, ensuring that intra-group transactions are excluded.

Assumptions and notes on methodology

- In order to avoid double reporting, consolidated boundaries have been set at for Scope 1, 2, 3, in accordance with the GHG Protocol centralized approach.
- The inventory of GHG emissions includes all relevant companies and activities selected based on the criterion of 100% operational control. Entities with operational control according to the GHG Protocol were included.
- In Rompetrol's centralized reporting, emissions related to LPG quantities are reported by gas stations (Rompetrol Downstream Romania) and Rompetrol Gas for their own emissions from sold gas, thus avoiding double counting.
- The operational transport from the refineries to the other Rompetrol entities, including LPG, automotive and rail (electric) transport, as well as to its own storage facilities, is carried out by **third parties** contracted by Rompetrol Downstream or by Rompetrol Rafinare SA. Thus, the emissions associated with Scope 3 (since they are external carriers) are included in the calculation by Rompetrol Downstream (Romania) and Rompetrol Gas.
- Emissions associated with waste generated, based on quantity and type of waste generated, have been included in the calculation as significant/material at the industrial sites only, excluding fuel stations as non-significant for this category.
- Emissions associated with wastewater treatment plants were included in the calculation as material.

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- To avoid double reporting, the quantities of Scope 1 fuel from Rompetrol's own fleet (entities in industry and services, as well as the Rompetrol Downstream fleet) were subtracted from the total quantities of Scope 3 fuel, as these vehicles are fuelled from Rompetrol filling stations.
- In the case of operational transport carried out by third parties, their fuel consumption was included in Scope 3 for the quantities used from other suppliers. To avoid double reporting in the case of external transporters, who supply from Rompetrol filling stations (they are contractual Rompetrol customers), emissions were calculated and included in Scope 3 only once.
- A large share of the fixed asset additions (CAPEX) assigned to Category 2 is already reflected in Category 1, as investment projects include both capitalizable and non-capitalizable costs. For reporting efficiency, these amounts are therefore consolidated and presented together under Category 1.
- The fuel storage facilities are operated by Rompetrol Downstream, the associated emissions being reported by these entities (emissions of Romoil SA and Rompetrol Logistics SRL storage facilities are included in Rompetrol Downstream (the entity that operates the storage facilities).
- Emission factors for fossil fuels (gasoline and diesel) and biofuels (bioethanol and biodiesel) were calculated in accordance with RED II requirements. To calculate the emission factors of biofuels (biodiesel and bioethanol), the product characteristics according to the data provided by the manufacturer were used. All biofuels purchased by Rompetrol Refinery are certified according to RED II.
- The quantities of fuel sold by Rompetrol Downstream, are delivered by Rompetrol Refinery. The emission factors of fuels and biofuels sold in gas stations are calculated based on the data provided by Rompetrol Refinery (for fuel sold in Romania). It should be noted that less than 1% of Rompetrol Refinery's total fuel volume comes from purchases from the market, and this amount is included in the emissions calculation.
- EU ETS emissions calculations have been reported under Scope 1 where applicable (the two refineries Petromidia and Vega).

SCOPE 1

Scope 1 emissions refer to direct greenhouse gas emissions from sources controlled by the organization. They were calculated as follows:

Rompetrol industrial entities

Emissions from installations – **EU ETS** – **Rompetrol Refinery SA – Petromidia Refinery, Vega Refinery**. Direct emissions from installations include the following sources: combustion in furnaces, flares, processes. No fugitive or emergency gas emissions are accounted for, they are not considered relevant emissions on the enclosed industrial platform (for refinery processes).

There are continuous wastewater treatment plant (WWTP) related emissions. The methodology to calculate the CO2e emission related to WWTP is:

- the volume of wastewater was recorded on each stream entering WWTP
- COD concentration was recorded on each industrial water flow and BOD concentration for domestic water
- the emission factor 0.25 kg CH4/kg COD was used and 0.6 kg CH4/kg for BOD
- The resulting CH4 was multiplied by the GWP factor (28)

GHG emissions (under EU-ETS) are calculated based on activity data (fuel consumption, production per plant etc.). The direct emissions of the installations are calculated according to the EU ETS regulations, validated by an accredited external verification body. The total flare gas (Nm3) is taken into account.

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The monitoring of CO2 emissions is carried out based on a monitoring plan approved by the competent authority. For each flow identified in the Plan, the consumption of combustible gases is recorded (through verified measuring equipment).

Also, each fuel gas used is analyzed daily (chromatographic composition) necessary for calculating the emission factor.

No assumptions are made. All input data is recorded/measured/analyzed.

Mobile emissions – include company vehicles (tons CO2e) Emission factors: RED II

Rompetrol services entities (Rompetrol Quality Control SRL, other.)

Heating gases, vehicles, refrigerants have been included in Scope 1 if material and controlled by Rompetrol.

Rompetrol Downstream SRL – Warehouse and Fuel distribution stations

Truck transport (may be Scope 3 if carried out by a carrier – service provider – external), refrigerants (losses of cooling agents) from refrigeration units and air conditioning are included in Scope 1.

Rompetrol Gas SRL – LPG bottling stations in Arad and Bacău – emissions come from heating plants (propane combustion). Emissions associated with the combustion of fuel from own fleets (type 1 emissions) – were taken into account in the quantities of fuel sold by Rompetrol Downstream (type 3 emissions) to avoid double reporting of these emissions, as they are supplied by Rompetrol filling stations.

SCOPE 2

Rompetrol Scope 2 emissions represent all indirect greenhouse gas emissions resulting from purchased electricity consumption. There are no steam purchases or other upstream generated energy.

Rompetrol industrial entities - Purchased electricity (MWh) from the supplier is used for market-based calculation, based on the supplier-related factors is used for location-based calculation. For Rompetrol Rafinare – Petromidia Refinery, emissions resulted from the steam purchased are also included in scope 2.

Rompetrol service entities (Rompetrol Quality Control SRL, Headquarters activities, other.) - Purchased electricity (MWh) from the supplier is used for market-based calculation, country factor is used for location-based calculation.

Rompetrol Downstream SRL – Warehouse and Fuel distribution stations - Purchased electricity (MWh) from the supplier It is used for market-based calculations based on the supplier factor, while the country factor is applied for location-based calculations.

Rompetrol Gas SRL – LPG bottling stations in Arad and Bacău - Purchased electricity (MWh) Is utilised for the market-based calculation, the supplier factor is applied, while the country factor is used for the location-based approach

*PEM - the EF for electricity is expressed in kg CO2 equivalent (includes CH4, N2O). And for the emissions related to the steam purchased is calculated only CO2 (scope 1 Rompetrol Energy), under EU-ETS.

* RGS: The emission factor for electricity has been taken from the energy label of the provider.

SCOPE 3

Rompetrol Scope 3 significant emissions are all indirect greenhouse gas emissions resulting from the upstream and downstream activities of Rompetrol entities, given the established boundary, a significance assessment to identify relevant categories was performed. The emissions factors used are activity based or spend -based depending on availability of data and published emission factors (DEFRA), following GHG protocol guidelines for significance and estimation.

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Notes f0r PEM:

Cat.1 - volumes of substances purchased multiplied with EF (crude oil – EF from CSR of KMG related to extraction of crude oil; other purchased raw materials (SRGO, diesel) FE from the climatiq-ecoinvent database, for ethylene and methanol EF from IPCC, for natural gas EF from IOGP Environmental Performance Indicators; for crude oil (LIBIA and GUYANA). For bio components and MTBE from suppliers. For services - value (from invoices) multiplied with EF from Defra

Cat.2 - value (from invoices) multiplied with EF from Defra

Cat.3 - consumption MWh multiplied with EF from Defra.

Cat.4&Cat.9 - volumes of product (purchased & sold) multiplied with the distance (km) multiplied with EF from GHG P.

Cat.5 - waste quantities multiplied with EF from Defra.

Cat.6 - CO2 from airplane companies

Cat.7 - km travelled * average diesel consumption * RED II EF

Cat.10 - value (from invoices) multiplied with EF from US EPA

Cat.11 - quantities multiplied with EF from RED II JPCC and COCS FE from the national value list. FE for Jet Fuels (Aviation-jet gasoline) from IATA.

Cat.12 - quantities sold multiplied with EF from UK

Notes for Rompetrol Gas

Cat. 1. The FE for procurement of goods and services was sourced from the US EPA database (see row 671): https://catalog.data.gov/dataset/supply-chain-greenhouse-gas-emission-factors-v1-2-by-naics-6/resource/fbc78d3c-49bd-40c0-9dac-2ed16c07a305

Cat. 2. The emission factor for capital goods was sourced from the US EPA database (see row 982): https://catalog.data.gov/dataset/supply-chain-greenhouse-gas-emission-factors-v1-2-by-naics-6/resource/fbc78d3c-49bd-40c0-9dac-2ed16c07a305

Cat. 5 Waste generated in operations – The emission factor was sourced from DEFRA, and the wastewater emission factor was calculated using test report values for CCOCr/BOD_5 total.

Cat. 6 Business travel – Data was provided directly by the service provider.

Cat. 9 Downstream transport and distribution – The emission factor was supplied by the Petromidia Refinery.

Cat. 11 Use of products sold – The emission factor was taken from Table 2.2 of IPCC 2006, Volume 2.

Notes for Rompetrol Downstream:

Category 1: Purchases of goods and services – FE sourced from Carbon Saver – Scope 3 Supply Chain CO_2e Factors (carbonsaver.org/tools/scope_3_CO2e_factors.php).

Category 2: Capital goods (operational leasing) – FE sourced from Carbon Saver – Scope 3 Supply Chain CO_2e Factors (carbonsaver.org/tools/scope_3_CO2e_factors.php).

Category 5: Waste – Quantities multiplied by DEFRA FE. FE for mixed municipal waste taken from the European Commission's official website.

Category 6: Business travel – Data provided by the service provider.

Category 9: Downstream transport and distribution – DEFRA FE.

Category 11: Use of products sold – FE taken from Table 2.2 of IPCC 2006, Volume 2.

Note for Rompetrol Quality Control:

Category 2: Values (from invoices) multiplied by DEFRA FE.

Category 5: Waste quantities multiplied by DEFRA FE.

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The table below shows the GHG emissions, broken down into scope 1-3 emissions.

Scope & Category - Rompetrol Rafinare SA and affiliated entities	Actual 2024	Actual 2025	Target 2030	Target 2050
Gross GHG emissions - **Scope 1** (tCO2eq -Direct Emissions)	721,916	1,014,513	-12.80%	-18.40%
Percentage of Scope 1 GHG emissions from systems of regulated trading of emission certificates (%)	95.41 %	95.33%	-	-
Gross GHG emissions - **Scope 2 according to location** (tCO2 equivalent) - location based	66,964	228,382	-2%	-5%
Gross GHG emissions - **Scope 2 by market** (tCO2eq) - Indirect Emissions (market -based)	116,974	149,166	-2%	-5%
Gross GHG emissions - **Scope 3** (tCO2eq)	16,172,545	16,511,223		
1 Purchased goods and services	997,412 restated	1,121,439	TBD	TBD
2 Capital goods	4,057	1,915	-	-
3 Fuel and energy activities (not included in Cat. 1 or Cat. 2)	16,950	13,387	-	-
4 Upstream transport and distribution	27,389	28,403	-	-
5 Waste generated during operations	22,451	3,707	-	-
6 Business Travel	4	12	-	-
7 The employee's commute	140	77	-	-
8 Upstream leased assets	0	0	-	-
9 Downstream transport and Distribution	34,703	36,177	-	-
10 Processing of sold products	82,538	103,734	-	-
11 Use of the products sold	14,986,478 restated	15,201,811	-	-
12 End-of-life treatment of sold products	422	561	-	-
13 Downstream leased assets	-	-	-	-
14 Franchises	-	-	-	-
15 Investments	-	-	-	-
Total GHG emissions (location-based) (tCO2 equivalent)	**16,961,425** restated	**17,754,118**	**-2.83%**	**-6.03%**
Total GHG emissions (market-based) (tCO2 equivalent)	**17,011,435** restated	**17,674,902**	**-2.83%**	**-6.03%**

- In 2024, the General Turnaround at the Petromidia Refinery was conducted between March 8 and May 12 (65 days of total shut down)
- Emissions in 2025 were significantly influenced by the total throughput processed. The refinery maintained a high throughput level in 2025 (5.89 million tons compared to 4.62 million tons in 2024), driven by increased market demand and favourable pricing, which contributed to optimizing the economic performance of the production units
- The company's Scope 1 reduction targets are based on the implementation of decarbonization and energy efficiency projects, Scope 2 assumes that all affiliated entities will source electricity from green power providers, and Scope 3 focuses on addressing and reducing material CO_2 emissions through value-chain engagement and targeted decarbonization measures, including supplier engagement, low-carbon procurement, logistics optimization, and the development of lower-carbon products
- The total reduction of 2.83% represents the weighted average of reductions across Scope 1, Scope 2, and Scope 3, calculated according to each scope's contribution to total emissions.
- In 2024, downstream emissions (Cat. 11) for quantities sold to related parties outside Rompetrol Rafinare's consolidation were omitted, and upstream emissions (Cat. 1) for quantities transferred from Petromidia to Vega were included although they should have been eliminated since they are intercompany transactions. The table below presents the restatement of Scope 3 emissions, resulting from adjustments related to related party transactions (Category 1 and Category 11).

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	2024 (as reported)	2024 (restated)
E1-6- Scope 3	14,032,765 tCO2e	16,172,545 tCO2e

The table below shows the GHG emissions intensity (t**CO2e/USD**).

	2024 Restated*	2025
GHG intensity per net revenue (location based)	0.004554 (tCO2e/USD)	0.004039 (tCO2e/USD)
GHG intensity per net revenue (market based)	0.004567 (tCO2e/USD)	0.004021 (tCO2e/USD)

*Amount restated is due to restatements in 2024 total GHG emission, change in the currency of the net revenue (from RON to USD) and prior year the ratio was calculated inversely, with net revenue used as the numerator and GHG emissions as the denominator in kilotonnes and not tonnes. The previous amount and the restated amount (in RON) are presented below. In the table above, we presented the GHG intensity in USD.

	2024 (as reported)	2024 (restated)
GHG intensity per net revenue (location based)	1.173698 (kg/RON)	0.000953 (tCO2e/RON)
GHG intensity per net revenue (market based)	1.169839 (kg/RON)	0.000956 (tCO2e/RON)

2.2.3 GHG removals and GHG mitigation projects financed through carbon credits

ESRS E1-7

During the reporting period, Rompetrol did not perform nor partake into GHG removal or GHG storage activities.

2.2.4 Internal carbon pricing

ESRS E1-8

Rompetrol does not currently employ an internal carbon pricing scheme.

2.2.5 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

ESRS E1-9

Rompetrol is still in the process of identification and quantification of anticipated financial effects of significant physical and transition risks and the potential to benefit from significant climate-related opportunities.

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3 ENVIRONMENTAL POLLUTION AND PROTECTION

ESRS E2

3.1 Concepts and measures relating to pollution

3.1.1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

ESRS 2 IRO-1

At Rompetrol, the potential pollution-related impacts, risks, and opportunities for the refinery, gas stations and depots, are analyzed within the evaluation of environmental aspects. This evaluation is carried out based on a documented procedure. When identifying specific environmental aspects, the following are taken into account: the direct environmental aspects of the activities, services, products of the organization and the indirect ones (which the company can influence), including:

- air emissions from stationary sources and in receiving neighbourhoods (emissions);
- odours;
- spills in water;
- waste management;
- management of substances of concern;
- soil pollution;
- noise;
- the use of raw materials and natural resources;
- the impact on communities.

In order to identify the impact/risk/opportunity of the business activities, we assess each unit/plant/activity of the refinery, gas stations and depots. The calculation of the environmental impact is calculated according to severity, frequency, affected neighborhoods, regulation. Quarterly communication is performed on the company website of environmental issues in order to engage and inform the public.

Rompetrol Rafinare SA and its subsidiaries (**Rompetrol**) are included in the KMGI Group Risk Profile. In the risk management stage, the "Pollution" aspect is analyzed in depth, taking into account both the financial and non-financial risks associated. In order to minimize the negative consequences, the organization develops customized control measures, adapted to the specificity of each identified risk. Internal measures include the establishment and implementation of strict standards and procedures for the management of environmental pollution risks, as well as the promotion of sustainable practices in all **Rompetrol** activities. In order to improve the efficiency and effectiveness of the pollution risk management process, specific actions aimed at reducing negative impact.

Rompetrol Rafinare SA identifies the relevant risks and opportunities arising from the analysis of the context in which it operates, compliance with obligations, and the needs and expectations of relevant interested parties.

Additionally, risks may also be associated with emergency situations that could have harmful impacts on the environment, health and safety at work, or other effects on the company. In identifying potential emergency situations, the nature of the hazard, the type and extent of the most probable emergency situations, and potential emergency situations in neighboring areas (Domino effect) are considered.

Relevant risks for the intended outcomes of the integrated management system, as well as those associated with permanent or temporary changes within the organization, are identified and evaluated by process owners/department managers, who establish and plan appropriate actions to address them. In the case of planned changes, the evaluation is carried out before the modification is implemented.

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Opportunities for improving the performance of the management system are also identified, and those that prove feasible after evaluation are included in the organization's plans/programs.

Identified risks and opportunities that can generate other risks and opportunities for the organization are also taken into account and evaluated.

The implementation status of actions is periodically reported to the management, providing input for the management's analysis.

In this way, **Rompetrol Rafinare SA** ensures that:

- The management system can achieve the intended results (compliance with legal and regulatory requirements regarding environmental protection, operational security, and improving environmental/health performance);
- It develops the desired effects (protecting the environment);
- It prevents or reduces undesirable effects (non-compliance with legal and regulatory requirements, negative impact on the organization's reputation, the environment, or employees' health).

Within the management system, **Rompetrol Rafinare SA** identifies environmental aspects and impacts associated with activities, its products from a "life cycle" perspective, and aspects generated by the external environment, considering the stages that the company can control or influence, compliance obligations, and the context in which it operates, as well as abnormal conditions and reasonably foreseeable emergency situations.

Both environmental aspects associated with planned/new activities and products that the organization can control, as well as those that the organization can influence, related to services provided by contractors or other organizations, including those associated with outsourced processes, are prioritized to determine the significant environmental aspects – those associated with activities that can have a significant (or significant) impact(s) on the environment.

Significant environmental aspects can also result from risks and opportunities associated with either harmful environmental impacts (threats) or beneficial environmental impacts (opportunities).

Hazards regarding health and safety at work that the organization can control are identified, and the risks associated with both planned/new activities and products, as well as those related to services provided by contractors or other organizations, including outsourced processes, are evaluated.

For both significant environmental aspects and risks regarding health and safety at work, appropriate actions for addressing them are established through programs and plans.

Rompetrol Downstream SRL (DWS) and **Rompetrol Gas SRL** have implemented a QHSE system, which, among other things, contributes to minimizing environmental risks.

Rompetrol Quality Control (RQC) carries out laboratory activities and provides comprehensive, RENAR-accredited testing for petroleum products, environmental factors (air, water, soil), and petrochemicals, which involve both risks and opportunities related to pollution, management of natural resources, and environmental protection. The activities of our laboratories are monitored to identify potential pollution sources and risks of soil, water, and air contamination. The identification process includes the use of environmental monitoring tools through laboratory analyses. In this process, both the direct impacts of the organization's activities and services (identified hazards) and the indirect effects that RQC can influence are analyzed.

As part of our double materiality assessment, we analyze our site locations and business activities. We implemented a thorough screening process to identify the actual and potential pollution-related impacts, risks, and opportunities within our own operations and value chain. Furthermore, we conducted consultations with our stakeholders as part of the materiality assessment.

Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the pollution IROs from the double materiality analysis conducted.

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3.1.2 Policies

ESRS E2-1

We recognize the interdependency between impacts on people and the environment, as well as the risks and opportunities they present.

We adopted policies to manage our material impacts, risks, and opportunities related to pollution, which are in accordance with the minimum reporting requirements laid out in the Minimum Disclosure Requirements with respect to policies (MDR-P) as defined in ESRS 2. Mapping of key policies to the areas mitigating negative impacts related to pollution of air, water and soil including prevention and control, of substances of concern, Moreover, we disclose with regard to our own operations and our upstream and downstream value chain, our policies that address the specified areas.

- The top management at **Rompetrol** has established, implemented, and maintains policies and rules in the areas of QHSE that are appropriate for the organization's purpose and context. All policies refer to both working points. Among these policies and rules is QHSE Policy, SEVESO Policy, Energy Policy, Water Management Policy, Life Saving Rules, “Zero” Tolerance Rules.

Contractors and sub-contractors are subject to our policies by binding documents such as the contract and the additional Health Safety Security and -Environmental Protection agreement.

The adoption of practices necessary for identifying, assessing, and managing processes and associated risks is promoted, as well as the periodic evaluation of environmental aspects, with a constant focus on minimizing their impact on the surrounding environment through pollution prevention and emission reduction.

The company's policies are communicated to all employees and are available to interested parties. The policies are periodically reviewed to ensure they remain relevant and appropriate.

Our operations in Petromidia and Vega refineries are also strictly regulated through **Integrated Environmental Permits** by the relevant environmental authorities, in accordance with applicable legislation. This regulatory framework underlines our commitment to environmental protection and operational safety, ensuring that our refineries operate at the highest standards.

Rompetrol is committed to operating in compliance with environmental laws and regulations, guided by an **Integrated Management System** that emphasizes environmental protection. This commitment includes, among other things, **reducing pollution.**

In 2025, **Rompetrol Rafinare SA** maintained its certifications that attest to our commitment to quality and environmental protection, ISO 9001:2015 and ISO 14001:2015 respectively.

Maintaining ISO 14001:2015 certification for environmental management systems, which focuses on environmental aspects including pollution prevention, risk reduction and improving an organization's environmental performance, demonstrates a commitment to continuous improvement of environmental performance.

Both the Petromidia Refinery (also called the Petromidia Platform), the Vega Refinery (also called the and the Vega Platform) as well as Rompetrol Downstream SRL and Rompetrol Gas SRL operate under rigorous regulatory standards as a ‘upper-tier’ SEVESO establishment, complying with Law 59/2016 which transposed the SEVESO Directive for the management of major-accident hazards involving dangerous chemicals.

Thus, a **Hazardous Substances Policy** is in place.

In accordance with applicable legislation and the Company’s internal policies, including the QHSE Policy, SEVESO Policy, related procedures, operating regulations of technological installations, and emergency-specific action plans (such as the Emergency Preparedness and Response Capacity procedure, accidental pollution management procedures and related internal regulations), Rompetrol

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Rafinare SA, Rompetrol Downstream SRL and Rompetrol Gas SRL have established a comprehensive framework to prevent, mitigate and manage material environmental and safety-related impacts, risks and opportunities (IROs). The other entities (Romoil SA, Rompetrol Petrochemicals SRL, Rompetrol Logistics SRL) do not fall under the Hazardous Substances Policy and are in the process of developing and implementing a comprehensive framework in place to prevent, mitigate, and manage material environmental and safety-related impacts, risks, and opportunities.

These policies and procedures are designed to address identified negative impacts and risks related to major industrial accidents, accidental pollution, hazardous substance releases and emergency situations, as identified through the Company's risk assessment and materiality processes. In particular, they aim to limit adverse effects on the environment, employees, contractors, local communities and other potentially affected stakeholders, while ensuring compliance with SEVESO requirements and environmental protection legislation.

The policies set out clear roles, responsibilities, preventive measures, emergency response protocols and mitigation actions, thereby reducing the likelihood and severity of potential incidents and supporting effective incident response and recovery. Where relevant, they also support the identification of opportunities related to improved operational resilience, enhanced environmental protection, continuous improvement of safety performance and strengthened stakeholder trust.

The implementation and effectiveness of these policies and procedures are periodically reviewed and tested through drills, inspections and audits, and are updated as necessary to reflect changes in operational activities, risk profiles, regulatory requirements and lessons learned from incidents or near misses.

What we do:

- Identify potential emergency situations, assess the size and severity of their consequences at each site;
- Develop specific documentation for sites where there is a major accident risk due to hazardous chemicals;
- Establish the preparation and response procedures for such situations;
- Take measures to prevent/reduce the consequences of an emergency situation, in accordance with the magnitude of the emergency and its potential impact on the environment and people;
- Communicate relevant information to staff and stakeholders regarding such situations;
- Train staff, plan, and periodically test intervention plans;
- Periodically review and improve emergency response plans and capacity, especially after an emergency situation arises or following tests, if applicable;

The individuals within **Rompetrol** at the highest level, responsible for implementing the pollution-related policy, are:

- Petromidia and Vega Refineries – General Director;
- Rompetrol Downstream – General Director;
- Rompetrol Gas SRL – Sole Administrator;
- Rompetrol Quality Control SRL – General Manager.

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3.1.3 Actions

ESRS E2-2

In accordance with the Minimum Disclosure Requirements for Actions (MDR-A), our key actions taken in the reporting year and planned for the future either to avoid or reduce pollution and restore, regenerate and transform ecosystems where pollution has occurred, are described in this section.

There are documented analysis regarding the comparison of the operating methods of the installations belonging to Rompetrol Rafinare SA – both sites, with the conclusions of BAT/BREF as required by the transposed EU Industrial Emissions Directive, with all applicable measures already implemented, no phasing put of harmful substances is applicable.

Applicable legislation includes:

- Decision 2014/738/EU for for the refining of mineral oil and gas
- Decision 2021/2326/CE for large combustion plants (applicable only for Vega refinery).

Thus, each applicable requirement was evaluated in relation to its stage of implementation. Following the comparative analysis (also submitted to the regulatory authority), it is concluded that Rompetrol Rafinare SA complies with all applicable requirements.

The applicable BAT requirements address the following pollution-related aspects:

- Environmental management systems;
- Air emission monitoring and key parameters;
- Monitoring of VOC emissions, Prevention or reduction of diffuse VOC emissions;
- Water emission control Emission levels.

The BAT (Best Available Techniques) Decisions for refineries were issued in 2014 and became applicable in 2018. All relevant measures have been fully implemented, including online flue gas analyzers, enhanced monitoring frequency, and other compliance actions. Currently, there is no ongoing review of BAT Decisions.

The updated Directive 2010/75/EU on industrial emissions aligns with the objectives of the European Green Deal, aiming for a climate-neutral, clean, and circular economy by 2050, with optimized resource management and minimal pollution. The directive must be transposed into national legislation by July 1, 2026. Following this, integrated environmental authorizations and any new regulatory requirements will be reassessed.

The company remains in full compliance with all requirements of the Environmental Integrated Permit.

Related to ecosystem restauration, in March 2019, 500 meters from Vadu town and 2.5 km from the Black Sea shore, on the land belonging to Rompetrol Rafinare SA, was discovered an area of contaminated sand/soil with petroleum products, land that is part of Danube Delta Biosphere (protected habitat aria)

Historical contamination, probably resulting from 1991, from the activities of unclogging Pond 1, which were carried out as a mandatory condition within the treatment plant project.

Procedures initiated as per regulations, in accordance with Law 74/2019 for contaminated sites were as follows:

- Preliminary Assessment Report submitted to the Environment Protection Agency
- Detailed investigation has been submitted to the authorities.
- Feasibility Study submitted to the Environment Protection Agency
- Remediation project

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During 2025 the procedure for obtaining the environmental agreement continued; as part of this procedure RRC must develop the environmental impact report and adequate assessment study (related to biodiversity). At the time being, RRC submitted the proposal for schedule, experts' team and environmental aspects that will be assessed.

Following the annual management analysis, it is concluded that **Rompetrol Downstream SRL** and **Rompetrol Gas SRL** comply with applicable requirements of the management programs, which address the following pollution-related aspects:

- Environmental management systems
- Air emission monitoring
- Monitoring of VOC emissions, Prevention or reduction of VOC emissions (applicable only for Rompetrol Downstream)
- Water emission control
- Emission levels

During the reporting period, we focused on maintaining the validity of regulatory acts, ensuring compliance with legal requirements to mitigate environmental incidents and maintain certifications according to ISO 14001:2015, as part of our Integrated Management System.

ISO 14001 places a strong emphasis on pollution prevention. Organizations implementing this system are encouraged to identify sources of pollution and take measures to prevent emissions, water and soil pollution.

In addition, environmental compliance activities include reports and audits aimed at meeting deadlines imposed by both internal and legal requirements, together with the timely transmission (immediately after entry into force) of any new legal requirements relating to applicable European regulations (Directives, Decisions, Regulations).

3.1.3.1 Actions taken by Rompetrol that extend to upstream commitments in the value chain

The product/service supplied by the suppliers must comply with the contractual requirements and the criteria imposed by Rompetrol. The type and extent of control applied to the suppliers and the supplied product/service depend on the effect of the supplied product/service on the final product, its impact on the environment, health and safety at work.

Through the contractual specifications/provisions, suppliers communicate methods for inspecting and testing the supplied product.

The evaluation/re-evaluation and selection of suppliers, as well as contracting, are carried out at the KMGI Group level, with the involvement of Rompetrol staff from the relevant departments, in accordance with the contracting strategy based on health, safety, and environmental protection requirements, as well as other documented requirements in the Group's "Procurement" procedure, and associated internal regulations. The execution of contracts is carried out by Rompetrol staff.

The selection of a supplier is based on several types of evaluations of their competences with established criteria (price, technical conditions, quality, transaction-related risks, history and quality of collaboration with the supplier, company policy, ISO certifications, QHSE certifications/sustainability criteria for purchased biofuels, authorizations, legal and regulatory requirements, documentation, etc.).

Rompetrol purchases/uses only sustainable biofuels, certified according to a sustainability system recognized by the European Commission.

Rompetrol considers product quality requirements, including sustainability requirements, environmental requirements for each stage of the product lifecycle.

For fuels and other products in the portfolio, Rompetrol complies with the requirements of national product standards imposed by regulatory authorities, as well as those specified in the organization's Standard Specifications.

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For products in the polymer range, Rompetrol Rafinare SA applies requirements related to product development.

Design services related to new or modified technological installations and equipment (infrastructure) are procured from external suppliers, as they are not part of the regular activities carried out by the organization.

3.1.3.2 Action plans to achieve pollution objectives and targets

The management at the highest level plans the actions to be undertaken within the management system to address significant environmental aspects, compliance requirements, and the sustainability of identified risks and opportunities.

In the planning of actions, consideration is given to the best available practices and techniques, technological and financial options, as well as operational requirements and activity execution needs.

The planning is implemented through: QHSE management plans, prevention and protection plans, emergency response plans, programs for verifying emergency response capabilities, training plans, investment plans/programs, assessments performed by procurement, production programs, utility plans, maintenance plans, audit programs, inspection and/or verification programs, testing programs, etc.

The QHSE objectives set at all relevant levels of the company are measurable and in line with the policies declared by the highest level of management, including commitments to pollution prevention and the promotion of sustainability criteria.

In establishing the objectives, the current and future strategies of **Rompetrol** and the markets it serves, the results of the management analysis, the outcomes of the processes carried out by the organization, compliance obligations, significant environmental aspects, sustainability criteria for biofuels, BAT/BREF technological options, financial, operational considerations, consultation with and viewpoints of relevant stakeholders, and identified risks and opportunities for improvement are taken into account.

To achieve the objectives, programs are established, implemented, and maintained that include:

- Necessary actions/stages;
- Required resources;
- Designation of responsibilities and assigned functions for achieving the objectives;
- Deadlines by which the objectives must be achieved;
- How and when evaluations will be made, including indicators for measuring and monitoring progress.

Responsibilities for achieving the objectives are communicated to all involved functions. Within **Rompetrol,** plans/programs for QHSE activities are developed, which are periodically analyzed and revised whenever necessary to ensure compliance with requirements.

3.1.3.3 Actions regarding pollution

Measurement and monitoring associated with environmental factors is carried out by accredited laboratories, based on service contracts.

Monitoring the quality of environmental factors on sites (Petromidia Refinery, Vega Refinery, **Rompetrol** Downstream, **Rompetrol** GAS) is carried out according to the requirements of the Integrated Environmental Permits / Environmental Permits.

All tests are based on an Inspection and Testing Program that is carried out with the accredited laboratory, **Rompetrol Quality Control SRL**.

The test results are centralized and analyzed, transposed into reports and, where appropriate, actions are initiated to keep the activity under control and maintain and improve environmental performance at the refinery level.

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In order to align with European air quality standards and comply with BAT/BREF requirements, during the 2025 financial year Rompetrol refineries implemented a series of actions aimed at reducing environmental impact, taking into account the location and nature of the activities carried out. During the reporting period, Rompetrol refineries ensured the monitoring and management of air emissions at their two refinery sites in strict compliance with applicable environmental legislation, including Commission Implementing Decision 2014/738/EU and Commission Implementing Decision (EU) 2021/2326, which establish Best Available Techniques (BAT).

Air emissions management encompasses the continuous and periodic measurement of key atmospheric pollutants, the operation and maintenance of emission control and abatement systems, the implementation of operational controls to prevent exceedances, and the timely reporting of emission data to competent authorities. It also includes the investigation of deviations, implementation of corrective measures, and ongoing optimisation of processes to minimise emissions at source. This approach is supported by the use of state-of-the-art, metrologically verified monitoring equipment, operated by qualified personnel, and by internal procedures designed to ensure data accuracy, regulatory compliance and continuous improvement of environmental performance.

The pollutants for which there are regulations regarding emission limit values are sulfur dioxide (SO_2), nitrogen oxides (NOx) and dust from blast furnace gases emitted by combustion plants. In order to ensure accurate and constant monitoring, emissions are continuously monitored in real time at critical units, in accordance with the standards of the best available techniques (BAT). In parallel, all technological installations involving combustion processes are subject to rigorous emission control by an accredited laboratory, thus guaranteeing high-precision monitoring. For emissions from the FCC the new hydrogen plant and the SRU (Sulphur Recovery Unit), monitoring is carried out continuously with on-line analyzers, according to the BAT Conclusions Decision 2014/738/EU in case of Petromidia Refinery.

The inspection and testing program presents the analysis method, sampling points and sampling conditions, conditions that are recorded in the test reports. The monitoring of combustion emissions from fixed sources is carried out for all technological installations where there are combustion processes, and in case of accidental or scheduled shutdowns / restarts, air quality monitoring is also carried out at agreed points in the proximity of the communities located in the vicinity of the site.

The monitoring of VOC emissions is carried out in accordance with Law 264/2017, for Rompetrol Rafinare S.A. refineries the total emissions of volatile organic compounds into the atmosphere were evaluated, according to the methodologies recommended by the European Commission and the European Environment Agency.

For gasoline loading/unloading facilities and tanks, verification is done on time and VOC Inspection Certificates are issued by accredited companies.

Rompetrol Rafinare SA implements LDAR (Leak Detection and Repair) technology to identify and remedy uncontrolled volatile organic compounds (VOC) leaks that may occur in sensitive equipment, such as valves, pumps, flanges and connectors. Through constant monitoring and prompt interventions, our goal is to significantly reduce accidental VOC emissions and minimize their impact above the environment.

Our commitment to environmental protection is reflected in regular monthly and annual reports submitted to environmental authorities, confirming compliance with legal norms and the integrated environmental authorization. By using these advanced technological strategies and solutions, **Rompetrol Rafinare SA** continues to optimize its environmental performance, thus contributing to cleaner air and protecting environmental health, without compromising operational excellence.

For advanced monitoring and forecasting of pollutant dispersion in the area, the **Petromidia Platform** uses the ARIA application, developed by Aria Technologies. This is a real-time dispersion modeling tool for relevant pollutants, which integrates local meteorological data to provide accurate and efficient estimates of their behavior in the atmosphere.

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The Petrochemical Plant uses state-of-the-art technologies to reduce emissions and improve operational safety, including:

- Safety valves for pressure equipment, which allow collection in a closed system;
- Explosive gas analyzers and tall chimneys to ensure effective dispersion;
- Nitrogen drying systems and filters in HDPE and PP plants, for capturing polymer powder;
- Dust extraction hoods in HDPE and PP plants, to prevent stabilizer dust emissions.

The monitoring of air emissions is carried out in accordance with the Environmental Permits, using calibrated and metrologically verified equipment, and by qualified personnel.

Air quality monitoring, within the Vega refinery, is also carried out through two fixed stations located outside the site. The data are monitored and reported daily to the competent authorities. During 2025, there were recorded exceedances of the H2S indicator, averaged every half hour, compared to the permitted limit value.

For **Rompetrol Downstream**, the monitoring of VOC emissions is also conducted in compliance with Law 264/2017.

In the case of **Rompetrol Downstream SRL**, the Vapor Recovery Unit (VRU) System at the depots exemplifies efforts to reduce volatile organic compound (VOC) emissions by recapturing vapors during fuel loading processes. Similarly, gas stations are equipped with vapor recovery systems for tank unloading and fuel dispensing, illustrating our commitment to reducing VOC emissions overall.

For Rompetrol Gas SRL, air emission monitoring is carried out in accordance with the Environmental Permits, using calibrated and metrologically verified equipment, and by qualified personnel.

The inspection and testing program outlines the analysis method, sampling points, and sampling conditions, which are documented in the test reports.

Rompetrol Gas SRL's direct air emissions are measured and reported regularly to the competent authorities. The gases emitted by the thermal power plants at the LPG bottling stations in Arad and Bacău are measured annually, respectively every 2 years, when the technical inspection is carried out.

For Romoil SA and Rompetrol Petrochemicals SRL, there are no Air quality monitoring systems in place at the moment of this reporting.

Strategic projects aimed at reducing air pollution:

Action implemented in 2025

In the 2025 financial year, Rompetrol's significant actions, aimed at reducing atmospheric emissions are aligned with permits in place, consisting in BAT implementation and monitoring at the refineries.

Planned actions also consist of a proactive and systematic approach compliance.

*Actions regarding **water pollution.***

The key actions within Rompetrol undertaken to comply with the conditions imposed by legislation and the regulations issued by the competent authorities regarding water pollution are specific depending on the type of activity carried out.

Regarding the water management strategy of Rompetrol Rafinare SA, it is based on rigorous monitoring and verification processes. We ensure that all specific pollutants, as mentioned in our permits, are carefully monitored at varying frequencies, including daily, weekly, monthly, and quarterly assessments. In addition, the inspection and maintenance of wastewater transport facilities are prioritized, along with sealing and isolating structures/basins to prevent potential leaks or contamination. This heightened attention to infrastructure integrity is essential to minimizing the impact of our operations on the environment.

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Prevention and Control of Accidental Pollution

An essential element of our water management system is the **Accidental Pollution Prevention and Control Plan.** This plan outlines specific rules and procedures for managing potential incidents, establishing immediate intervention and control measures aimed at limiting the environmental impact and ensuring the safety of technological facilities. Through proactive planning and preparation, we aim to prevent or quickly address any accidental discharges, thus maintaining the integrity of local water bodies.

We regularly report water emissions, using specific objectives to monitor and demonstrate progress in our water management practices. Communities and authorities are consistently informed about any activities that could impact the pollutant load in the discharged water, ensuring a transparent and collaborative approach to water resource management.

Our principles for managing the discharge of treated water are designed to ensure the highest environmental protection standards:

- **Compliance with emission limits**: We strive to keep emissions to water below the limits specified in our Water Management Permit, ensuring the maintenance of water quality.
- **Operational efficiency of treatment facilities:** All facilities for the use, treatment, and discharge of wastewater are operated to ensure maximum efficiency, complying with strict operating regulations.
- **Pollution prevention:** Measures are in place to prevent or minimize the emission of pollutants into water. Unauthorized and accidental discharges are strictly prohibited, emphasizing our zero-tolerance policy towards water pollution.
- **Facility maintenance and leak prevention:** Routine maintenance is performed on all facilities that handle substances impacting water resources, including the implementation of leak detection devices where necessary.
- **Documentation and maintenance:** A comprehensive site plan details all underground constructions and pipelines, and wastewater discharge facilities are regularly checked and maintained.
- **Emergency preparedness:** Sufficient neutralizing/treatment substances are available and stored near facilities handling substances with water risk, ensuring readiness for any incidents.

An essential aspect of **water pollution prevention** is the **collection, treatment, and discharge of industrial wastewater.**

During 2025, given that the wastewater treatment plant served by Rompetrol Rafinare SA, designed to treat chemically impure water resulting from technological processes, took over a significant volume of domestic water from neighboring communities, especially from RAJA Năvodari and RAJA Corbu (whom both operate a large amount of domestic wastewater). Due to the lack of urban treatment plants, this impacted the treatment process and caused some deviations above the maximum concentration limits in the environmental permits issued for Petromidia Refinery, for the phosphorus and nitrogen compounds, as well as oil concentration limits. These deviations have been reported to the competent authorities as required by the legislation. In order to correct these deviations, respectively improve / optimize the wastewater treatment process taken in the Rompetrol Rafinare SA treatment plant, a series of immediate and medium-term actions were initiated, aimed at:

- periodic emptying of the foam that forms in the biological stage (to improve the activity of the biological sludge)
- cleaning of the technological equipment in the treatment plant to remove inactive sludge deposits (homogenizer, chimneys, sludge thickener, biological stage tank, etc.)
- replacement of the sludge separation centrifuge
- optimization of the refinery slop collection system (oil product recovery from wastewater).

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During 2025 Rompetrol Refinery has completed a capital investment project for the acquisition of a biphasic centrifuge for sludge management. The primary objective of the project is to ensure the efficient removal of sludge from the wastewater treatment plant, thereby supporting the continuous, safe, and regulatory-compliant operation of the facility. The acquisition of a biphasic centrifuge supports the maintenance of treatment plant performance in accordance with design and project requirements, with a direct positive impact on the quality of treated water discharged at the outlet of the treatment plant.

The project contributes to ensuring the safe operation of the treatment station and to fulfilling the commitments assumed under the Integrated Environmental Authorization. By maintaining compliance with applicable environmental legislation, the investment mitigates the risk of non-compliance and prevents potential fines or penalties resulting from failure to meet environmental requirements.

From an operational and economic perspective, the project delivers tangible benefits, including a reduction in maintenance expenses and a decrease in the number of operational interventions. The increased degree of sludge dehydration leads to improved process yield, while the reduction in sludge volumes results in lower costs associated with sludge handling, transport, and disposal.

Overall, the availability of dedicated on-site sludge treatment equipment enhances operational reliability, environmental performance, and long-term cost efficiency

Petromidia Refinery - Water Pollution Monitoring and Prevention

The concentrations of pollutants in the discharged wastewater are subject to detailed and systematic monitoring, in accordance with the regulations specified in the **Water Management Permit**, issued by the National Administration “Apele Romane”, valid for three years), as well as the provisions of the **Integrated Environmental Permit** issued by the Constanța Environmental Protection Agency), thus ensuring compliance with environmental protection standards and applicable legal regulations. Water quality analyses are conducted by an **ISO 17025 accredited laboratory.**

Petromidia Refinery - Wastewater Treatment and Discharge

Recognizing the importance of the Black Sea as a natural receptor, our practices and procedures are carefully designed to ensure that the treated wastewater from the Final Wastewater Treatment Plant (WWTP) meets the highest standards before being discharged. Wastewater is directed to the Final Wastewater Treatment Plant (WWTP), which belongs to **Rompetrol Rafinare** and has three treatment stages: mechanical-chemical, secondary biological, and tertiary biological. Chemically contaminated water resulting from technological processes on-site is collected in the chemical wastewater sewer system. All wastewater (chemical, meteorological, and domestic) from the site is directed to the Final Wastewater Treatment Plant. The treated water is discharged from the treatment plant into two ponds (Pond I for settling and Pond II with macrophytes), where the biological treatment process (tertiary treatment) is completed (naturally), and then it flows through Buhaz Creek into the Black Sea. The two self-purification ponds cover an area of 50 hectares and are located in the Vadu area, approximately 15 km north of the refinery. According to the Water Management Approval, the categories of wastewater that reach the Final Wastewater Treatment Plant include:

- Domestic wastewater;
- Rainwater;
- Water contaminated with salts (from the cooling water system);
- Chemically contaminated water.

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Monitoring of Treated Water Quality

The quality of treated water is monitored at the discharge point from Pond II into Buhaz Creek (and then discharged into the Black Sea). To ensure comprehensive wastewater quality management, **Rompetrol Rafinare** monitors a wide range of indicators at varying frequencies - from daily to semi-annually.

Hydrocarbon Discharges and Environmental Protection Efforts - Petromidia Refinery

Our detailed monitoring and treatment processes have kept **hydrocarbon discharges at levels below the detection limit**, demonstrating effective management of potential pollutants. Our commitment to environmental responsibility is highlighted by the average annual concentration of hydrocarbons in the discharged water, with a total quantity of hydrocarbons discharged of 1.36 tons. Trends in hydrocarbon discharges into water have been closely monitored:

Vega

Vega Refinery - Water Pollution Monitoring and Prevention

Pollutant levels in discharged water are strictly monitored in accordance with the provisions of both the **Water Management Authorization** and the **Integrated Environmental Permit**, with monitoring frequencies ranging from daily to semi-annual.

The refinery's operations result in technological and stormwater wastewater, which are locally pretreated through existing systems in the installations, before being sent to the final separator for petroleum products and then to the Corlătești wastewater treatment plant. Vega Refinery has a contract with a third-party entity for the wastewater treatment at the Corlătești plant.

Domestic wastewater is treated in a settler and then directed to the main separator.

Regarding fresh groundwater extracted for remediation or to control the migration of contaminated groundwater, there are 20 observation and monitoring boreholes (7 within the refinery and 13 built for the Vega lagoon decontamination project). Water from these boreholes is not used in production but only for monitoring the evolution of the underground aquifer. Water quality indicators are monitored every six months.

Rompetrol Downstream SRL (DWS)

Technological wastewater is collected through gutter systems, processed by hydrocarbon separators, and subsequently released into sewer systems, drainage tanks, or natural discharges.

Specifically, wastewater from three of the storage sites is treated at the ORM cleaning stations before being discharged. Compliance with wastewater treatment is ensured for certain work points in accordance with NTPA 001 / NTPA 002, while others require monitoring of specific indicators such as pH, total suspended solids, and chemical oxygen demand, among others. For domestic wastewater, NTPA 002 regulations apply at 170 fuel distribution stations, while NTPA 001 and NTPA 002 standards regulate stormwater discharge at various stations.

Pollutant levels in discharged water are closely monitored in accordance with the regulations outlined in both the Water Management Permits and the Integrated Environmental Permits.

Arad Depot

Domestic wastewater from toilets is directed to a mechanical-biological treatment station, with effluent treatment including a petroleum product separator. Technological wastewater from the washing of CF ramps and tank maintenance is pretreated before being discharged into the stormwater system, in accordance with NTPA 001 standards.

Rainwater is divided into two categories. First, rainwater that may be contaminated with petroleum products, which comes from the CF unloading ramp and the vehicle fuel loading ramp area. After leaving the separator, the water is discharged into the stormwater drainage channel of the platform.

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Second, "clean" rainwater, which falls on most of the station's surface, including the pavilion, road, and concrete platforms, is collected in separate channels through PVC pipes. It is discharged into the stormwater drainage system after being preliminarily processed through the petroleum product separator. Discharge provisions according to NTPA 001 apply to this category of water.

Craiova Depot

The complex water management system includes a reinforced concrete collection basin for domestic and technological wastewater, as well as PVC pipe networks for domestic waste. Stormwater management involves rectangular-section gutters and hydrocarbon separators, with dedicated wastewater treatment facilities for domestic wastewater.

The wastewater treatment stations include a domestic wastewater treatment plant, a collection basin for domestic wastewater and sewage (collection is done using a pump through a discharge pipe), and a petroleum product separator with an integrated sludge decanter for the periodic discharge of petroleum products.

Mogoșoaia Depot

It has a sealed, reinforced concrete drainage basin for domestic wastewater. Technological and rainwater, after hydrocarbon separation, are managed through retention basins and concrete tanks for regulated discharge.
Condensate from gasoline and diesel tanks, together with rainwater collected from the concrete basin at the CF unloading ramp and water collected in the truck loading area, pass through a hydrocarbon separator, and then all the water is discharged into two retention basins. From there, it is discharged upon request. The quality indicators of the discharged water must fall within the limits imposed by NTPA 002.

Șimleu Silvaniei Depot

Domestic wastewater and potentially polluted water are treated through a mechanical-biological treatment station before being discharged into the Crasna River, ensuring environmental compliance. Technological wastewater, potentially contaminated rainwater, and pre-purified domestic wastewater through the mechanical-biological station pass through the petroleum product separator.

Vatra Dornei Depot

It uses a drainage basin for domestic wastewater, which is then transported to the Vatra Dornei city treatment station.
Rainwater, together with water from platform washing, tank cleaning, and loading and unloading areas, is collected in the storm water drainage network, passed through a petroleum product separator, and then discharged into the Bistrița River.

Zărnești Depot

Domestic wastewater from the offices in the old building and the toilets of the Administrative Pavilion is collected through the sewer system and treated in a wastewater treatment station before being discharged into the Bârsa River. Water collected from the tank area, spaces designated for fuel transfer pumps from the tankers to CP1 and CP2, and the technological platform area, passes through a Hauraton-type petroleum product separator before being discharged into the Bârsa River using a PVC pipe sewer system.

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Rompetrol Gas SRL

The management of impacts related to wastewater discharge involves meticulous monitoring and adherence to regulatory standards for wastewater quality, ensuring that discharged water meets established limits and minimizes environmental impact. The limits set for wastewater quality indicators are covered by Government Decision (HG) 188/2002 – NTPA 002/2002, amended and supplemented by HG 352/2005. Stormwater discharged into the street is covered by the NTPA 001/2005 standard, according to HG 352/2005.

Each LPG filling station (Bacău LPG filling station, Pantelimon LPG filling station, Arad LPG Station) uses professional services for wastewater management and complies with guidelines on sustainable water use and discharge, reflecting Rompetrol's commitment to responsible water resource management and environmental protection.

Rompetrol Quality Control SRL (RQC)

Water discharge management is a part of RQC's environmental responsibilities, with all wastewater being discharged into the sewer system managed by **Rompetrol Rafinare SA**. In 2025, the total volume of discharged water was equal to the volume of domestic water used, i.e., **17.730** megalitres, demonstrating a comprehensive approach to managing the impacts related to water discharge and ensuring that wastewater discharge processes are aligned with environmental standards.

The semi-annual monitoring of discharged water includes a range of indicators, including pH levels, suspended solids, SS (suspended solids), chemical and biochemical oxygen demand, and anionic surfactants, ensuring that the discharged water meets environmental standards.

*Actions regarding **soil pollution***

Efforts to prevent environmental contamination include the strategic placement of euro containers and designated temporary storage areas to prevent soil pollution. The **Petromidia** and **Vega Platforms** are equipped with appropriately marked containers and storage areas, minimizing the environmental impact.

In the close vicinity of Vega Refinery, there is a hazardous waste landfill consisting of 14 lagoons located on the northern side of the refinery platform, **Vega Refinery** covering approximately 82,450 square meters. These lagoons are designed with impermeabilization measures, using compacted soil layers and bentonite to prevent leaks and soil contamination. This aspect is addressed within the *ESRS E5 - Circular Economy topic, under the sub-topic of Waste*.

For **Rompetrol Downstream SRL, Rompetrol Gas** and **the administrative offices of these entities**, the facilities are designed to prevent soil and groundwater pollution, featuring concrete platforms, drainage systems, and vapor recovery installations.

*Actions regarding **pollution with hazardous substances***

The strict compliance of the **Petromidia Refinery, Vega Refinery, Rompetrol Downstream SRL**, and **Rompetrol Gas SRL with environmental Protection Objectives**

a) Maintain the validity of the environmental permits (no expired environmental permits) and ensure the necessary conditions for compliance with the maximum permissible limits of the environmental parameters/indicators monitored according to the environmental permits and the legal provisions in force.
b) Target: i.100% on time; ii.0 exceedances of the maximum permissible values.

Within the legislative framework established by the **SEVESO Directive** we ensure the implementation of comprehensive preventive and control actions, resulting in minimized risks regarding pollution with hazardous substances.

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To prevent pollution with hazardous substances, **Rompetrol Rafinare** has implemented a series of documented measures, including specific procedures and plans. These actions aim to prevent and manage accidental pollution through a comprehensive strategy, detailed environmental protocols integrated into the operational manuals of each refinery unit, and fully developed structures for emergency response and crisis management.

In line with the regulatory requirements of the SEVESO Directive, we continued strengthening our process safety management system throughout 2025–2026. Our approach prioritizes risk prevention, operational integrity, and the protection of employees, communities, and the environment. In this respect, part of the measures set out in the plan of measures following the SEVESO 2025 inspection were remedied by the end of 2025 (repair of fire extinguishing installations, cooling rings, completion of priority preventive maintenance activities on high-risk equipment, etc.). For the other measures left open for the year 2026, a comprehensive set of compensatory measures were in place to prevent the occurrence of events of a nature to produce emergency situations and to ensure that operations remain controlled and compliant until permanent solutions are finalized (regular technological tests and functionality checks of safety-critical equipment, measuring ground discharge resistance, checking breathing valves at tanks, delimiting/marking areas at risk, etc.)

In the context of actions undertaken to prevent pollution with hazardous substances, it is essential to emphasize the interconnection between hazardous waste management and its environmental impact. Thus, within the topic of *ESRS E5 - Circular Economy, under the sub-topic of Waste*, actions related to hazardous waste management will be addressed, actions that will contribute to avoiding pollution with hazardous substances.

3.1.4 Targets

ESRS E2-3

3.1.4.1 Presentation of pollution targets and their relationship to policy objectives

In the context of the activities carried out by **Rompetrol**, environmental targets are defined by the limits set by the Environmental Permits and Water Management Permits issued in accordance with the applicable legislation. Our pollution control targets are aligned with the requirements set by the applicable legislation, with no additional voluntary commitments beyond regulatory compliance. The values resulting from periodic analyses of water, air, and soil quality parameters are continuously monitored, following the frequencies specified in the relevant regulations for each main activity carried out.

The Integrated Environmental Permit sets a limit value for each relevant indicator (emission/target value, expressed as concentration) either in air (exhaust gas emissions) or in water (effluent from the wastewater treatment plant). Continuously, through testing programs (analyses) and the inspection program, all the indicators mentioned in the environmental permit are monitored (**emissions to air, water**, soil - subsoil), as well as the obligations regarding the management of **hazardous substances**.

Regarding the management of hazardous substances, Rompetrol has not established specific quantitative targets for 2025, as no material pollution risks related to hazardous substances have been identified under normal operating conditions of the installations. The management approach in this area is therefore primarily compliance-based and preventive, focusing on strict adherence to applicable legislation, permitting conditions and operational controls.

In this context, the implementation of Best Available Techniques (BAT) at Rompetrol Rafinare plays a key role in ensuring effective control and prevention of potential environmental impacts associated with hazardous substances. BAT requirements define the operational performance standards and control measures applied at installation level, supporting the optimisation of industrial processes, the reduction of pollutant emissions and the prevention of environmental incidents.

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While BAT implementation does not represent a stand-alone quantitative target for hazardous substances, it provides a structured framework for continuous improvement and regulatory compliance, which underpins the Company's environmental performance and contributes to the prevention of significant impacts.

BAT has provided an effective framework for setting performance targets, considering the best available technological and procedural solutions. By adopting these techniques, **Rompetrol Rafinare** has adjusted its procedures to comply with regulated limits.

The target is to ensure full annual compliance with permitted emission limits, in line with legislation and the provisions of applicable BAT (Best Available Techniques) Decisions for Rompetrol Rafinare S.A., as reflected in the Integrated Environmental Authorization.

The targets/objectives set at all relevant levels of the company are measurable and aligned with the policies declared by the top management, including commitments to pollution prevention, and the promotion of sustainability criteria.

In setting the objectives, current and future strategies of **Rompetrol Rafinare SA**, **Rompetrol Downstream, Rompetrol Gas**, and the served markets are considered, along with the results of the analysis performed by management, the outcomes of the processes carried out by the organization, compliance obligations, significant environmental aspects, sustainability criteria for biofuels, health and safety risks at work, technological options—BAT/BREF (only for Rompetrol Rafinare SA), financial and operational aspects, consultation with/relevant stakeholders' viewpoints, and identified risks and opportunities for improvement.

3.1.4.2 Monitoring the effectiveness of policies and actions through targets (ESRS 2 MDR-T)

Within **Rompetrol**, all data obtained from the measurement and monitoring of the integrated management system are periodically analyzed and evaluated by top management or responsible personnel to demonstrate the adequacy and effectiveness of the integrated management system in continuous improvement of its effectiveness.

Periodically, at a defined frequency, compliance with legal requirements and other applicable regulatory requirements related to environmental protection is evaluated through:

- Internal audits
- Inspections
- Document/record analysis
- Analysis of the results of monitoring/verification conducted for environmental aspects

Compliance evaluation is also carried out by authorities/certification bodies following external inspections/audits.

When deviations are found during the compliance evaluation, appropriate actions/measures are taken.

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3.1.5 Pollution of air, water and soil

ESRS E2-4

The pollution of air, water, and soil changed over time as, being reduced due to the use of modern technologies, advanced safety practices and comprehensive internal policies. Within the measurement of the pollution of air, water, and soil we employ the internal methodologies in evaluating and calculating the pollution values and risks. To collect data for our pollution-related accounting and reporting, we use measurements of the pollution quantities around our business operation sites, together with values and data that are received from the national regulators and agencies.

The pollutants monitored at **Rompetrol** are presented in the table below:

Types of emissions	Location and emissions monitored
Air emissions	**Petromidia Refinery** Sulfur oxides (SOx), Nitrogen oxides (NOx), dust, Carbon monoxide, Volatile organic compounds (VOCs), H2S
	Vega Rafinery NOx, SOx, dust, VOCs, H2S
	Rompetrol Downstream SRL VOCs
	Rompetrol Gas SRL Sulfur oxides (SOx), Nitrogen oxides (NOx, dust)
Water emissions	**Petromidia Rafinery** SEEP (substances extractable with petroleum ether), benzene, toluene, ethylbenzene and xylene, sulfides and hydrogen sulfide, sulfates, phenols, and total suspended solids, ammonium nitrate, total nitrogen and total phosphorus, detergents, total ionic iron, nickel, mercury, vanadium, lead, cadmium, diethylhexyl phthalate (DEHP), trichlorobenzene, 1,2-dichloroethane, dichloromethane, tetrachlorethylene, PCBs, hexachlorobutadiene.
	Vega Rafinery CCOCr, suspended matter, extractable substances, naphthenic acids, sulfonic acids, phenols, cyanides, sulfides, lead, nickel, ammoniacal nitrogen, cyanides, benzene, anthracene, naphthalene, cadmium, ammoniacal nitrogen.
	Rompetrol Downstream SRL NA pH, MTS, CCOCr, CBO5, SEEP, temp, phosphorus, anionic surfactants, ammoniacal nitrogen, sulphides and H2S, sulphates, chlorides, etc.
	Rompetrol Gas SRL NOx, SOx pH, MTS, CCOCr, CBO5, SEEP, temp, phosphorus, anionic surfactants, ammoniacal nitrogen, sulphides and H2S, sulphates, chlorides, etc.
	Rompetrol Quality Control SRL NA
Soil emissions	**Petromidia Rafinery** As, Ba, Cd, Crt, Cu, Mn, Hg, Ni, Pb, Se, V, Zn, sulfates, sulfides, benzene, toluene, xylene, phenol, total aromatic hydrocarbons, total PAHs, TPH.
	Vega Rafinery As, Ba, Cd, Crt, Cu, Mn, Hg, Ni, Pb, Se, V, Zn, sulfates, sulfides, benzene, toluene, xylene, phenol, total aromatic hydrocarbons, total PAHs, TPH.
	Rompetrol Downstream SRL NA
	Rompetrol Gas SRL NA

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Petromidia Refinery – quantities water emissions

Pollutant	Annual quantity kg/year 2024	Annual quantity kg/year 2025
SEEP	53,514.46	49,008.00
Benzene	0.09	0.08
Toluene	0.09	0.08
Etilbenzene	0.09	0.08
Xilene	0.09	0.08
Petroleum product	1,355.7	2,180.86
Sulphides and hydrogen sulphide*	139.14	66.16
Sulphates*	917,772.90	1,548,652.80
Phenols*	194.70	321.00
TSS	143,597.12	115,985.60
CCOCr	722,623.52	677,453.9
BOD5	181,057.24	178,062.40
Ammonia nitrogen	96,147.64	15,354.65
Total nitrogen	115,056.08	50,641.60
Total phosphorus	15,902.71	15,020.95
Detergents	1,070.29	980.16
Total ionic iron	820.55	729.77
Nickel*	82.95	78.41
Mercury*	2.14	1.96
Vanadium*	227.44	227.89
Lead*	120.41	115.17
Cadmium*	4.28	3.92
Diethylhexyl phthalate (DEHP)**	0.0002	0.0002
Trichlorobenzene**	0.0001	0.0001
1,2-Dichloroethane**	0.0011	0.0010
Dichloromethane**	0.0011	0.0010
Tetrachlorethylene**	0.0011	0.0010
PCB**	0.0001	0.0000
Hexachlorobutadiene**	0.0011	0.0010

The quantities of emissions into water are calculated based on the pollutant load values of the discharged wastewater, in which an averaging of these analyzed indicators is made, with a monthly, quarterly and semi-annual monitoring frequency, in accordance with the Water Management Permit, related to the volume of water discharged. The results of these concentration determinations are reported monthly/annually to the environmental authorities.

* the monitoring frequency is quarterly

** the monitoring frequency is semi-annual

For Vega Refinery – quantities water emissions:

Pollutant	Annual quantity tons/year 2025	Annual quantity tons/year 2024
Substances in suspension	49.41	37.66
Sulfonic acids	0.23	0.19
Chemical consumption of oxygen	187.42	176.39
Phenols	0.12	0.061

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Air emissions

Petromidia air emissions (tons)		2025	2024	2022
Sulphur oxides	Refinery units	261.38	207.78	248.79
	Petrochemical units	0.0004	0.00	3.78
Nitrogen oxides	Refinery units	450.54	291.17	383.25
	Petrochemical units	0.5901	1.39	60.60
Particulate matter	Refinery units	17.16	13.69	17.79
	Petrochemical units	0.0013	0.00	2.03
Carbon monoxide	Refinery units	145.43	92.73	120.7
	Petrochemical units	0.2253	0.55	27.90
Ozone-depleting substances	not applicable			
Volatile organic compounds *	Emission related to gasoline storage, loading & unloading (mandatory to report according to Low no.264/2017)	106.96	80.89	92.00
	Total diffuse emissions calculated for Petromidia Refinery/ crude oil input (no requirements for reporting)	598.48	441.01	965.27

* VOC emissions factors: EMEP/EEA air pollutant emission inventory guidebook (CORINAIR) 2019- Fugitive emissions oil - refining/storage

Vega air emissions	2025	2024	2022
NOx (t)	25.504	21.79	24.85
SOx (t)	0.229	0.189	0.214
PM(t)	0..722	0.596	0.671

*For VEGA - Also CORINAIR methodology applied/ emission factors.

Regarding soil emissions, there are no direct contaminations. We conduct annual soil monitoring by analyzing the concentration of specific pollutants to evaluate the long-term impact of on-site activities and identify any potentially contaminated areas. The parameters are monitored and analyzed by a RENAR-accredited laboratory. All soil test results from 2024 were within legal limits, confirming the absence of pollutant exceedances in the monitored areas, including the refinery premises and external locations.

Notes:

Rompetrol Rafinare - Regarding the online analysis of flue gases, they undergo the QAL2 procedure every five years and the AST procedure annually. As part of these processes, an accredited company conducts parallel monitoring to compare the obtained results and ensure accuracy.

We do not employ any inferior methodologies in our monitoring processes. All environmental monitoring activities are conducted strictly in accordance with the provisions of the Environmental Integrated Permit. This ensures that data collection, analysis, and reporting adhere to the highest regulatory standards, using validated methodologies and approved procedures. Our approach guarantees accuracy, reliability, and compliance with environmental regulations, reinforcing our commitment to responsible environmental management.

For Rompetrol Gas & Rompetrol Downstream - on the pollution measurement methodology, we confirm that, in accordance with the provisions of the environmental authorization, environmental factors are monitored on a daily, weekly, monthly, or annual basis, depending on the specific indicator being assessed. The results are then compared against the established emission limit values. Monitoring is conducted by a RENAR-accredited laboratory, ensuring compliance with regulatory standards. For the identification of potential contamination, particularly in soil, samples are taken at 5 cm and 30 cm depths in case of suspicion and analyzed against the applicable legislative requirements.

Rompetrol Gas and Rompetrol Downstream are not subject to the reporting obligations outlined in Regulation (EC) No 166/2024, as their operations do not meet the criteria established by the regulation. This regulation primarily applies to industrial installations engaged in activities with significant environmental impact, as defined by the European Pollutant Release and Transfer Register (E-PRTR).

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These activities typically include large-scale energy production, industrial manufacturing, waste treatment, and chemical processing, all of which are subject to strict emission reporting requirements based on defined pollutant thresholds. However, Rompetrol Gas and Rompetrol Downstream operate in sectors focused on LPG distribution, fuel retail, and related services, which do not fall within the scope of industrial activities covered by the regulation. Additionally, the reporting requirements under Regulation (EC) No 166/2024 are triggered only when pollutant emissions exceed specified thresholds for air, water, or soil contamination. Given that neither Rompetrol Gas nor Rompetrol Downstream engage in large-scale refining, processing, or other industrial operations associated with significant emissions, they do not meet the conditions for mandatory reporting. Despite not being covered by the regulation, both companies remain committed to environmental responsibility and compliance with all applicable national and EU environmental standards**,** ensuring that their operations adhere to best practices for sustainability and pollution prevention.

For 2025 for Rompetrol Vega, Rompetrol Downstream, Rompetrol Gas and Rompetrol Quality Control maintained full compliance, with no incidents of non-compliance or enforcement actions required due to violations of permitted conditions.

Petromidia Platform – Rompetrol Rafinare SA, Rompetrol Downstream SRL work sites, **Rompetrol Gas SRL** work sites – are not located in a water risk area.

Rompetrol Rafinare SA falls under the scope of the IED (Industrial Emissions Directive) and EPRTR (European Pollutant Release and Transfer Register).

Rompetrol Rafinare – Petromidia is subject to the Commission Implementing Decision of 9 October 2014, establishing the conclusions on the Best Available Techniques (BAT) under Directive 2010/75/EU of the European Parliament and Council on industrial emissions, for the refining of mineral oil and gas, and the Reference Document on BAT in the Production of Polymers.

There are no programs or derogations granted related to the implementation of BAT-AEL (Best Available Techniques – Associated Emission Levels).

3.1.6 Substances of concern

ESRS E2-5

Rompetrol Rafinare SA, Rompetrol Downstream SRL, and **Rompetrol Gas SRL** are subject to the **SEVESO Directive.** The European **"**SEVESO" Directive requires the identification of industrial facilities with major hazards. A SEVESO facility is one that is involved in the handling, manufacturing, use, or storage of hazardous substances.

Rompetrol Quality Control uses 5 substances of very high concern in limited quantities. The 5 substances of very high concern are: phenolphthalein, potassium dichromate, potassium chromate, boric acid, lead II acetate trihydrate. Considering the small quantities of substances of high concern used (as per substances table above for RQC) and the protective measures implemented, we consider these substances are insignificant in terms of impact upon health and environment.

At both refineries, chemicals and chemical preparations are supplied both from internal and external suppliers. The refineries fall under the provisions of Law no. 59/2016 regarding the control of major accident hazards involving hazardous substances as a high-tier establishment.

In accordance with the current regulations, all chemical products are accompanied by Safety Data Sheets, which contain basic information about the chemical composition of the product, hazard identification data, first aid measures, fire prevention and extinguishing measures, measures for preventing accidental spills, requirements for transportation, handling and storage, stability and reactivity data, toxicological information, ecological information, recommendations for final disposal, etc.

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The table below presents the substances of concern (under SEVESO Directive) present within the **Petromidia Refinery**. For each substance, the existing quantity is specified (production/ consumption 2025).

Nr.	Name of the hazardous substance	CAS no.	Quantity 2024 (t)	Quantity 2025 (t)
1	**CRUDE OIL**	8002-05-9	4,002,556.33	5,369,584.068
2	**GASOLINE**	86290-81-5	1,266,052.943	1,663,802.77
3	**GASOLINE** (INTERMEDIATE PRODUCT)		5,370.93	2,929.17
4	DA	64741-42-0	60.96	6.55
5	HB	64742-48-9	146.25	1,009.904
6	RC	64741-63-5	2,149.45	3,156.237
7	CC	64741-54-4	3,014.27	789.386
8	LIGHT NAPHTA	64742-89-8	-	-
9	**DIESEL**	68334-30-5	2,044,297.434	2,533,962.939
10	**DIESEL** (intermediate products, DA, Cx)		12,201.69	7,672.672
11	**JET**	8008-20-6	400,043.44	573,078.072
12	**JET** (INTERMEDIATE PRODUCT)		3,235.6	3,611.453
13	**MTBE**	1634-04-4	26,900	29,961
14	**PROPANE**	74-98-6	3,601.96	1,460.197
15	**BUTAN-BUTENE**	87741-01-3	-	-
16	**PROPILENE**	115-07-1	82,740	81,878
17	**ETILENE**	74-85-1	-	32,250
18	**GASES WITH H2S**	7783-06-4	55,123.17	228,190
19	**METHANOL**	64-56-1	10,836.4	13,555
20	**1-BUTENE**	106-98-9	-	-
21	**N PENTAN + I-PENTAN**	68476-55-1	871.43	913.461
22	**C5-C6**	68476-50-6	35,424.25	59,706.559
23	**LPG**	68476-85-7	180,550.0	211,579.785
24	**HFO**	68553-00-4	111,757.71	140,015.744
25	**REZIDUU CC**	64741-62-4	3,861.59	3,056.242
26	**SLOPS (stoc)**	67476-33-5	260	688
27	**VACUUM DISTILLED**	68955-27-1	10,554.242	13,528.392
28	ETHANOLAMINE	141-43-5	11.28	194
29	DIETANOLAMINA (DEA)	111-42-2	88.823	144.174
30	HEXAN	64742-49-0 110-54-3	473.75	2,029.447
31	ADDITIVES	64742-94-5 25551-13-7 91-20-3 108-67-8	41.36	47.506
32	BIODIESEL	67762-38-3	108,110.19	130,944.973
33	BIOETHANOL	64-17-5	32,179.11	46,840.807

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The table below presents the substances of concern present within the **Vega Refinery** (total/year). For each substance, the existing quantity are specified.

Substance/mixture	CAS no.	Quantity 2025 (t)	Quantity 2024 (t)
Hydrocarbons, C5-C6	68476-50-6	58,447.565	34.652,80
Carbon Black Feedstock (slurry)	4741-62-4	2,379.191	3.861,59
Kerosene (JET A1)	64742-81-0 128-37-0	8,687.904	8.787,18
Fuel oil	64741-56-6 64741-62-4 64741-59-9	109,722.888	97.305,30
RAFINATE	64742-49-0	216,219.023	148.168,80
Hydrocarbons, rich in C5 (SE 30/60)	68476-55-1	44,062.423	29.584,84
Naphtha (petrol era), light refined with solvent (SE)	64741-84-0	1,695.383	1.496,51
Naphtha (petroleum), hydrotreated light (n-Hexane)	64742-49-0	95,304.963	65.128,17
Solvent aliphatic medium naphtha (petroleum) white spirit raffinate	64742-88-7	4,987.834	4.625,09
Light distillates (petroleum) chemically neutralized (Light Naphtha type II)	64742-89-8	116,038.542	55.896,40
Light distillates (petroleum) chemically neutralized (Light Naphtha)	64742-31-0	14,783.407	28.208,69
Rompetrol Calor Extra 1 (RCE 1 fuel)	64741-62-4 92045-24-4 64742-31-0	3,315.163	4.196,14
Rompetrol Calor Economic 3	64741-62-4 64742-31-0 68955-27-1 68553-00-4	9,397.639	11.026,48
Type 3 Light Liquid Fuel (CLU type 3)	68553-00-4 64741-56-6 64741-62-4 64741-59-9	0	0
Fuel oil 40/45	68553-00-4 64741-56-6 64741-62-4 64741-59-9	11,829.553	12.607,78
Dyeguard Blue MCR2Y/ OMM Blue 2 RO	64741-84-0	8.168	8,37
Primer for the protection of buried metal pipes Citom/Citom G	64742-93-4 64741-84-0	57.778	75,14

*all amounts are actual quantities at the end of 2025

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4 WATER AND MARINE RESOURCES

ESRS E3

4.1 Concepts and measures relating to water and marine resources

4.1.1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

ESRS 2 IRO-1

Rompetrol Rafinare SA and its subsidiaries are included in the KMGI Group Risk Profile. Water is recognised as a material operational resource, particularly in relation to industrial processes, wastewater generation and potential environmental impacts. In response, the Group has implemented internal procedures covering key aspects of water management, including water quality monitoring, wastewater treatment and controls aimed at preventing accidental pollution. These measures are designed to ensure compliance with applicable regulatory requirements and to mitigate potential adverse impacts on water resources.

At entity level, Rompetrol Rafinare SA, Rompetrol Downstream SRL and Rompetrol Gas SRL identify and assess water-related risks and opportunities based on their operating context, legal and permitting obligations, and the expectations of relevant stakeholders. Particular attention is given to risks associated with emergency situations that could result in environmental pollution or impacts on health and safety, including scenarios related to accidental discharges and potential domino effects from nearby installations.

Risks and opportunities relevant to water management are identified and evaluated by process owners and department managers, taking into account both ongoing operations and planned changes to activities or installations. For planned changes, the assessment is performed prior to implementation. Appropriate mitigation or improvement actions are defined where risks are identified, while feasible opportunities for improving water management performance are integrated into operational plans and programmes.

The implementation status of actions addressing material water-related risks and opportunities is periodically reported to management and forms part of the input to management reviews, supporting oversight and continuous improvement of water stewardship practices.

The stages of the process for identifying significant impacts, risks, and opportunities related to water resources include:

- Data Collection and Analysis is performed on:
  - Water Sources: Identification of water sources used.
  - Water Usage: Monitoring the quantities of water used in different operational processes and identifying the potential for recycling/reusing.
  - Water Quality: Evaluating the quality of water before and after use, as well as treating wastewater for recycling/reuse/disposal.
- Identification of Risks and Impact Evaluation related to water include:
  - Environmental Risks: Assessing the environmental impact of water use in operational processes, documented in the Environmental Aspects List at the platform level.
  - Availability Risks: Assessing the impact associated with water shortages during dry periods (development of a restriction plan).
  - Operational Risks: Identifying risks related to water supply interruptions and evaluating their impact on operations.

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- Identification of Opportunities relate to:
  - Water Use Efficiency: Implementing technologies and practices that reduce water consumption.
  - Water Reuse: Improving the system for reusing treated water to conserve resources and reduce dependence on external sources.
- Stakeholder Consultation related to water management include both:
  - Regulatory Authorities: Ongoing engagement and collaboration with relevant regulatory authorities to ensure compliance with applicable water-related legislation, permitting conditions and contractual clauses, as well as to address regulatory expectations related to water use, wastewater discharge and environmental protection.
  - Business Partners: Working with suppliers and customers to develop joint water management solutions (Administraţia Naţională „Apele Române" (The National Administration "Romanian Waters"), RAJA S.A. Constanța for the cities of Năvodari and Corbu, which are branches of the Constanta Public Water Company, as well as wastewater treatment station clients).
- Monitoring - Continuous Monitoring is performed to continuously track water usage and its impacts to adjust strategies and ensure continuous improvement.

For **RRC, DWS, Rp Gas:** The potential pollution-related impacts, risks, and opportunities for the refinery, gas stations and depots are analyzed within the evaluation of environmental aspects. This evaluation is carried out based on a documented procedure.

When identifying specific environmental aspects, the following are taken into account: the direct environmental aspects of the activities, services, products of the organization and the indirect ones (which the company can influence), from the perspective of the life cycle, as follows:

- air emissions from stationary sources and in receiving neighborhoods (emissions);
- smells;
- spills in water;
- waste management;
- management of hazard substances;
- soil pollution;
- noise;
- the use of raw materials and natural resources;
- the impact on communities.

In order to identify the impact/risk/opportunity of the business activities, we assess each unit/plant/activity of the refinery, gas stations and depots. The calculation of the environmental impact is calculated according to severity, frequency, affected neighborhoods, regulation.

As a laboratory service entity, **Rompetrol Quality Control SRL** identifies relevant risks and opportunities arising from the analysis of the context in which it operates, as well as from compliance obligations, needs, and expectations of relevant stakeholders. The quantity of water used is monitored, and wastewater is periodically analyzed.

Moreover, as part of our double materiality assessment, we identify our impacts, risks and opportunities related to our site locations and business activities along our value chain. We have implemented a thorough screening process to identify actual and potential water-related impacts, risks and opportunities within our operations and value chain. In addition, we have conducted stakeholder consultations as part of our materiality assessment.

For each new project an environmental impact assessment is performed, prior to implementation. This assessment identifies, describes and evaluates, as appropriate in each case, the significant direct and indirect effects of a project on the following factors:

a) population and human health (vicinity).
b) biodiversity, paying special attention to protected species and
c) land, soil, water, air and climate.
d) material assets, cultural heritage and landscape.

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During authorization procedure, if applicable acc. to EPA Decision, local communities are invited to public debates.

Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the water and marine resources IROs from the double materiality analysis conducted.

4.1.2 Policies

ESRS E3-1

Rompetrol adopted policies to manage material impacts, risks, and opportunities related to water and marine resources which are in accordance with the minimum reporting requirements laid out in the Minimum Disclosure Requirements with regards to policies (MDR-P) as defined in ESRS 2. The industry in which **Rompetrol** activates is subject to a wide range of regulations, standards, and policies aimed at protecting water, both in terms of consumption and preventing pollution or contamination. In this context, we have implemented dedicated internal procedures that cover all aspects of water management, from monitoring water quality and treating wastewater to preventing accidental pollution. These measures not only comply with regulations but also highlight our commitment to the responsible management of water resources.

Because refineries can use relatively large quantities of water depending on their size and the complexity of the refining process, and the amount of water withdrawn and consumed by an O&G company and the quality of its discharges can have impacts on ecosystems and people. Rompetrol drafted an ESG Policy applicable for the KMGI Group.

The policy is designed to guide our actions in a way that aligns with the best practices and industry standards. An effective ESG policy should commit to continuous improvement and regularly evaluate and update sustainability practices to remain aligned with evolving industry standards and stakeholder expectations. The draft policy addresses that water-related risks are reported annually in the Sustainability Report. There are no formalized policies related to sustainable oceans and seas, however Rompetrol aligns to permit level requirements for discharge.

Rompetrol acknowledges the critical importance of responsible water resource management. Our approach to water management includes reducing water consumption, improving water recycling processes, and ensuring wastewater treatment before discharge. We aim to mitigate our environmental impact and contribute to clean water and sanitation both in our operations and within the community. We implemented water efficiency and recycling practices in our operations to reduce water consumption. The water management practices adopted by **Rompetrol Rafinare SA** follow an integrated and responsible approach to the use, treatment, and conservation of water. Based on the AGA decision, there is a contract between RR and Apele Române, which defines the quantities of raw water to be extracted and the volume of water to be discharged into the Black Sea. The contract also establishes the maximum allowable contaminant limits for discharged water. **Rompetrol Rafinare** pays monthly contributions based on water quality analyses conducted by both parties.

Our water management strategy complies with the rigorous requirements of the **Water Management Authorization**. In 2025, Rompetrol Rafinare adopted an internal Water Management Policy that supports sustainable development and environmental protection by promoting the efficient and responsible use of water across its operations

Additionally, **Rompetrol Downstream SRL** and **Rompetrol Gas SRL** responsibly manage water, treating it as a vital common resource, in accordance with the requirements of the water management authorizations for each operational location.

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The QHSE policy of **Rompetrol Rafinare SA** aims at the sustainable use of this vital resource and includes water conservation and efficient water usage. In accordance with the law and regulations, water management authorizations include aspects related to water usage and supply, water treatment, and the prevention and reduction of water pollution. A fundamental element of the water management system within **Rompetrol Rafinare SA** is the **Accidental Pollution Prevention and Response Plan**. This is described in *ESRS E2*.

During the reporting period, **Rompetrol Rafinare SA** has maintained its certifications, which demonstrate our commitment to quality and environmental protection, ISO 9001:2015 and ISO 14001:2015. Regarding water, ISO 14001 includes aspects related to **water resource management** within the environmental management system. Specifically, it focuses on identifying, evaluating, and controlling the impact of the organization's activities on water, which may include water consumption, water pollution, wastewater management, and other aspects related to water resources.

The top management of Rompetrol has defined, implemented, and ensures the maintenance of policies and regulations in the areas of QHSE, security, and energy, which are aligned with the organizational purpose and context. In the process of establishing these policies, the following aspects have been considered:

- National and international context
- Alignment with the purpose and context of Rompetrol Rafinare S.A.
- Compliance obligations and applicable legislation
- Requirements set by stakeholders
- Sustainability requirements for products
- Requirements for evaluating compliance and correcting nonconformities
- Necessary resources
- Desired level of customer satisfaction
- Nature and types of risks and opportunities identified, with a focus on ensuring environmental protection, preventing pollution, and protecting natural resources, including water, through responsible management, promoting worker participation and consultation, and ensuring energy efficiency measures
- Opportunities and requirements for the continuous improvement of the effectiveness of the implemented system.

To achieve the objectives set in the company's policies, all activities related to environmental management are monitored to prevent nonconformities, including in the areas of water resource management and water pollution prevention.

The company's policies are communicated to all employees and are available to stakeholders. They are periodically reviewed to ensure they remain relevant and appropriate.

At the company level, the existing QHSE Policy regarding the management of significant impacts, risks, and opportunities related to pollution prevention and control, including water pollution, promotes the adoption of necessary practices for identifying, evaluating, and managing associated processes and risks, as well as the periodic assessment of environmental aspects. There is a constant focus on minimizing the impact on the surrounding environment, preventing water pollution and other natural resource depletion, reducing emissions, and using energy and resources efficiently, including water.

The individuals within **Rompetrol** at the highest level, responsible for implementing the water resources policy, are:

- Rompetrol Rafinare SA - Petromidia and Vega Refineries – Sorin Graure - General Manager;
- Rompetrol Downstream SRL – Zhanibek Nugertayev, General Manager;
- Rompetrol Gas SRL - Alexandru Lilian, Sole Administrator;
- Rompetrol Quality Control SRL - Temirlan Kantay, General Manager

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4.1.3 Actions

ESRS E3-2

In accordance with the minimum disclosure requirements for actions (MDR-A), our key actions taken during the reporting year and planned for the future related to **water resources** and **marine resources** are described in this section.

Actions are aligned to BAT for refineries in the context of Directive 2010/75/UE on industrial emissions (updated), to ensure optimization of water use, and water protection. All applicable measures have already been implemented (e.g.: online flue gas analysers, frequency of monitoring, etc.).

Regarding the reduction of *water consumption*, Rompetrol Rafinare SA, **Rompetrol Downstream SRL and Rompetrol GAS SRL** implement water-efficient technologies in production processes, with the primary objective of reducing the amount of water used. Additionally, processes are optimized to minimize water losses and increase water use efficiency throughout the entire production flow.

Rompetrol Rafinare SA continuously improves its wastewater recycling systems, thereby reducing reliance on external water sources. The treated water is reused in industrial processes such as washing and cooling, contributing to a more responsible and sustainable use of water resources.

For **Rompetrol Rafinare SA**, **Rompetrol Downstream SRL**, and **Rompetrol GAS SRL**, water quality is continuously monitored to prevent contamination.

For **Rompetrol Quality Control SRL**, the monitoring of chemically treated wastewater quality is carried out semi-annually.

Regarding the **upstream value chain,** relevant activities for Rompetrol Rafinare SA include:

- Collaboration with suppliers: Rompetrol Rafinare SA engages with key suppliers, where relevant, to promote responsible water management practices and compliance with applicable environmental requirements. This collaboration is intended to mitigate material water-related risks, such as excessive water use or pollution associated with activities, and to support the prevention of adverse impacts on water resources.
- Monitoring and reporting: Within its own operations, Rompetrol Rafinare SA has implemented water consumption monitoring systems at site level, covering significant water intake and use points. Monitoring is performed by operational and environmental teams, and results are periodically consolidated and reported to management. This supports the identification and management of material water-related risks and opportunities, ensures regulatory compliance, and provides transparency and accountability regarding water performance.

Downstream of **Rompetrol,** relevant activities for Rompetrol Rafinare SA include:

- Analysis of the Impact of Discharged Water in the Black Sea
- Promoting Water Use Efficiency: Awareness programs are developed for clients (platform consumers) to promote efficient water use and reduce water consumption.

On the Upstream Value Chain of **Rompetrol Downstream SRL and Rompetrol Gas SRL,** the following are performed:

- Collaboration with Suppliers: Partnerships are developed with suppliers to implement sustainable water management practices and reduce the impact on water resources.
- Monitoring and Reporting: Water consumption monitoring systems are implemented. Results are periodically reported to ensure transparency and accountability.

There are **no hydrologically stressed areas** in the operation areas, from where water extraction is performed by Rompetrol.

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4.1.4 Targets

ESRS E3-3

Targets are established within **Rompetrol,** particularly for our industrial sites. The measurable targets of the **Petromidia Refinery** for reducing water consumption are directly related to managing the risks associated with water availability. Even though Rompetrol sites are not located in high water stress area, the **Petromidia Refinery** aims to significantly reduce water intake (by 16% in 2026 versus previous year), reflecting a responsible approach.

Rompetrol Rafinare SA - Petromidia Refinery	**2022***	**2024**	**2025**	**2026**	**2030**	**2040**	**2050**	
Freshwater withdrawal (million liters),	8,702	9,008	10,707	9,028	8,648	8,572	8,272	1) 4)
Water discharge (million liters)	5,624	6,493	7,091	6,399	6,069	6,149	6,069	2) 3)
Water consumption (million liters) var.from base year	**2,781**	**2,515**	**3,616**	**-5%**	**-7%**	**-13%**	**-21%**	

*Note: 2022 is the reference year for measurements, calculation methodology for Water consumption = Water withdrawal - Water discharged

1) New pump installed in 2026 in the reusable water system

2) New Carasu pumping station starting 2027

3) New potable water and raw water supply systems after 2030

4) Fire-fighting Water Pipeline Main Replacement 2026-2038

The consumption reduction initiatives (1), (2), (3), (4) are examples of measures that contribute to the efficient use of water and reduce the risks related to its availability.

To achieve the target of a 21% reduction by 2050, the following initiatives have been considered, which impact the reduction of raw water consumption:

- New pump installed in 2026 in the reusable water system
- New raw water pumping station – Carasu (reducing freshwater withdrawal by 50 mil Liters per year)
- Replacement of the potable water distribution system at the Petromidia platform in 2030 (reducing potable water acquisition by 38 mil Liters per year)
- Replacement of the raw water transmission pipeline in 2040 (reducing freshwater withdrawal by 100 mil Liters per year)
- Replacement of pipeline for firefighting water reducing freshwater abstraction by 100 mil Liters per year

Rompetrol Rafinare SA - Vega Refinery	**2022***	**2024**	**2025**	**2026**	**2030**	**2040**	**2050**	
Freshwater withdrawal (million liters),	1,304.618	779.834	746.478	750	750	750	750	
Water discharge (million liters)	1,269.298	739.008	707.092	710	710	710	710	
Water consumption (million liters) var.from base year	**46.320**	**40.750**	**45.370**	**50**	**50**	**50**	**50**	

*Note: 2022 is the reference year for measurements, calculation methodology for Water consumption = Water withdrawal - Water discharged + water used for greening of the lagoons area project

2025 - water used for greening of the lagoons area project – 5,984 m3

The targets presented are **voluntary** and are part of the company's sustainability strategy to reduce environmental impact and improve operational efficiency.

Constant monitoring and internal and external audits demonstrate Rompetrol Rafinare SA's commitment to achieving these targets.

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The effectiveness of the actions taken by **Rompetrol Rafinare SA**, **Rompetrol Downstream**, and **Rompetrol Gas** to address the impacts, risks, and opportunities related to water resources is monitored through the following methods:

- Continuous Monitoring:
  - Implementation of monitoring systems to collect real-time data on water consumption and quality at various operational locations;
  - Internal and external audits to assess compliance with environmental standards and regulations.
- Reporting and Data Analysis:
  - Generation of periodic reports summarizing water usage, the effectiveness of implemented measures, and environmental impact. These reports are used to evaluate progress against set objectives;
  - Data analysis to interpret trends in water consumption and quality, identifying areas that require improvements.
- Performance Indicators Used:
  - Water consumption: Measuring the total volume of water used and evaluating efficiency by calculating the ratio between total production and water consumption.
  - Water quality: Monitoring water quality indicators to ensure compliance with local and international standards.
  - Water recycling and reuse: Measuring the percentage of recycled water and reducing freshwater consumption through recycling systems.
  - Environmental impact: Measuring the reduction of pollutant emissions in treated wastewater.

For the **Petromidia Refinery**, the water consumption reduction targets are aligned with the company's sustainability policies and its objectives regarding the efficient management of water resources and environmental protection. The company's policies focus on water conservation, improving water recycling and reuse processes, as well as reducing water pollution, in accordance with internal and external regulations. Reducing water consumption and using it efficiently are directly related to the responsibility towards the environment and the impact on natural resources.

The targets set for the Petromidia Refinery are **relative** and refer to reducing the abstraction of freshwater. The targets are specifically applied within the **Petromidia Refinery**, having a direct impact on production activities and water management within the refineries. The geographical limits are Romania, with particular focus on local water sources and water resources near the refinery. Performance will be monitored annually, and progress will be reported in the sustainability reports. The indicators used will include volumes of water consumed.

Regarding the **methodologies and significant assumptions used to define the t**argets, it can be mentioned that the water consumption reduction targets for the **Petromidia Refinery** are based on initiatives such as installing a new pump in 2026 in the reusable water system, the construction of a new raw water pumping station (Carașu), the replacement of the potable water distribution system in 2030 and main replacement of fire-fighting pipeline during period 2026-2038. These measures are designed to contribute to the efficient use of water and reduce risks related to its availability.

Water consumption reduction approaches are based on internal assessments and operational efficiency plans. Stakeholder consultation takes place within the IRO analysis, suggesting their involvement in the process of setting sustainability objectives and targets.

For Vega Refinery, the water consumption reduction targets are aligned with the company's sustainability policies and its objectives regarding the efficient management of water resources and environmental protection. The company's policies focus on water conservation, improving water reuse processes, as well as reducing water pollution, in accordance with internal and external regulations. Reducing water consumption and its efficient use are directly linked to environmental responsibility and the impact on natural resources.

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The targets set for Vega Refinery are relative and refer to the reduction of the amount of extracted water and discharged wastewater. The targets are specifically applied within Vega Refinery, having a direct impact on production activities and water management within the refineries.

Performance will be monitored annually, and progress will be reported in sustainability reports. The indicators used will include the volumes of water consumed.

For our Vega Refinery, the targets are to remain fully compliant with water permit conditions.

For Rompetrol Gas SRL, quantitative water consumption reduction targets cannot be established, as water use varies depending on operational activities. The only water consumption for which reliable and predictable volumes can be determined relates to the testing of LPG tanks, which involves emptying and refilling the tanks with pressurized water as part of mandatory safety procedures.

For Rompetrol Downstream SRL, quantitative water consumption reduction targets cannot be defined due to the specific nature of its activities, which primarily consist of providing services to customers. Water consumption is directly correlated with customer volumes and operational demand, with higher customer traffic leading to increased utility use, including water. As a result, consumption levels are driven by business activity rather than by discretionary operational choices, limiting the feasibility of setting fixed reduction targets.

Nevertheless, it is acknowledged that the cumulative volume of water consumption at distribution sites (fuel stations and depots) is significant. Water use is primarily associated with sanitary needs, cleaning activities, and operational safety requirements. In this context, water consumption optimization measures are implemented, even in the absence of formal quantitative reduction targets. These measures include, among others, the replacement of sanitary fixtures with high-efficiency equipment, the use of water-saving solutions, and the adjustment of operational practices at local level.

At company level, water efficiency measures are in place, and periodic monitoring of water consumption has been implemented in order to identify potential deviations and support informed decision-making. Furthermore, particular importance is given to preventive and corrective maintenance of utility equipment, with the aim of preventing losses, improving operational efficiency, and ensuring business continuity.

4.1.5 Water consumption

ESRS E3-4

Petromidia Refinery

The **Petromidia Refinery demonstrates** adaptive and well-structured water management, focusing on the efficient use of water resources to support both daily operations and the company's sustainable development goals. The water withdrawal approach is diversified to meet various operational needs, with a particular emphasis on the efficient and sustainable management of water.

Water sources are diversified and well-established. Petromidia relies on natural sources such as the Danube, Carașu, and Luminița branches to ensure a continuous water flow, thus adapting to the specific needs of the refinery. Additionally, the use of potable water infrastructure from the R.A.J.A. regional supply system reflects a dependence on external but well-integrated and reliable sources, ensuring a constant and secure supply for the refinery's needs.

Petromidia manages its water sources for technological and firefighting purposes by capturing water from the Poarta Albă-Midia-Năvodari Canal, with different capacities for normal conditions and emergency situations. In this regard, the refinery has a well-established system capable of ensuring operational continuity and responding effectively in case of emergencies, which is essential for the safety of industrial operations. The water supply for firefighting purposes is exclusively from the Luminița branch of the Poarta Albă-Midia-Năvodari Canal, ensuring readiness for emergency response.

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A strong point of the company's strategy is the cooling water recirculation system, with an impressive recirculation coefficient of 98%. This highlights Petromidia's commitment to resource efficiency and the reduction of freshwater consumption, serving as a clear example of the application of sustainability principles in industrial activity. This recirculation system has a significant impact on saving water resources and considerably reduces the amount of water needed for cooling processes.

The water recirculation system includes:

- Three recirculated water units: G1, G2, G3.
- Cooling water station ASU.
- Additional cooling water stations: G100, G200, G300.

The table below presents data regarding total water consumption, water abstraction and discharge, as well as the quantities of recycled and reused water for the years 2022-2025. This information is essential for assessing the impact of activities on water resources and promoting more efficient water usage practices. Continuous monitoring of these indicators helps optimize processes, reduce consumption, and ensure responsible water management in the context of climate change and pressures on natural resources. Our water use related metrics are not validated by an external body.

We do not have operations in high-water stress areas, however a storage capacity of 10,750 m³ is in place, which is typically not utilized as it is not required.

Indicator	Unit	2022	2024	2025
Total water consumption	**m³**	**2,781,418**	**2,514,786**	**3,615,760 1)**
Total water consumption in water-scarce areas, including areas with high water stress	m³	0	0	0
00Total amount of recycled and reused water	m³	752,401	633,793	265,101 2)
Total amount of stored water	m³	0	0	0
Changes in water storage	m³	0	0	0
Water consumption intensity (total water consumption in own operations, in m³ per net revenue in million USD)	%	*Please see figures below*		
Raw water consumption for cooling tower makeup	m³	3,414,731	2,819,859	4,289,609
-Raw water consumption in the fire network	m³	1,188,938	1,914,062	1,060,285
Raw water consumption for producing filtered water for sale	m³	2,556,687	2,367,055	3,170,861 3)
Additional intensity rates	%	0	0	0
Total water withdrawal	m³	8,701,710	9,008,148	10,707,210
Raw water withdrawal	m³	8,405,578	8,721,550	10,375,345
Drinking water withdrawal	m³	296,132	286,598	331,865
Total water discharges	m³	5,624,160	6,493,362	7,091,450

In 2025, total water consumption (1) increased compared to previous years, primarily due to the refinery operating close to its maximum capacity and a reduced volume of recycled and reused water (2), resulting from technological requirements of the fire-fighting system. Additionally, raw water consumption used to produce filtered water for sale (3) also increased, driven by start-up procedures and testing activities for the Cogeneration Plant operated by Rompetrol Energy.

Notes:

Total water consumption - is the amount of water withdrawn (that is, the total water abstracted from the Carasu and Luminita sources) minus the amount of water that is discharged

Total amount of recycled and reused water represents the treated effluent from the Wastewater Treatment Plant (WWTP) that is supplied back into refinery systems. This treated water is reused for operational purposes such as fire-fighting systems and cooling processes in various units

Raw water consumption for the production of filtered water intended for sale to third parties with consumed volumes determined based on calibrated flow measurements.

Total water withdrawal is the combined amount of raw water withdrawal and drinking water withdrawal.

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Raw water withdrawal represents the total amount of raw water withdrawn from the two water sources, Carasu and Luminita. The raw water requirement for the Petromidia Platform is mainly supplied from the Danube–Black Sea Canal, with water withdrawn from SP1A (Anghel Saligny Pumping Station), where the quantity is measured using a fiscal meter. The Luminita source primarily supplies the Fire Water Network and, in special situations, also provides the required raw water for the Water Treatment Plant, with the withdrawn volumes measured by a fiscal meter.

Drinking water withdrawal represent drinking water from RAJA.

Total water discharged is treated water in Waste Water Treatment plant and sent to Black See from Refinery.

Vega Refinery

The Vega Refinery ensures its supply of technological and fire-fighting water primarily from underground water wells, including P1, P2, P6, and the wells in conservation P3, P4, P5, P7, P8. This water from the underground wells reaches the refinery through a main pipeline with a diameter of 8 inches, forming a closed loop (ring-type) within the refinery. From this loop, the water is distributed to various technological installations through pipes with diameters of Dn50 and 200 mm, across a network of approximately 7.8 km. The water management authorization permits a maximum annual volume of 1,715,500 cubic meters of water, ensuring a sufficient supply for refinery operations while adhering to the principles of sustainable water use.

Indicator	Unit	2022	2024	2025
Total water consumption	m^3	46,320	40,826	45,370
Total water consumption in water-scarce areas, including areas with high water stress	m^3	0	0	0
Total amount of recycled and reused water	m^3	0	0	0
Total amount of stored water	m^3	0	0	0
Changes in water storage	m^3	0	0	0
Water consumption intensity (total water consumption in own operations, in m^3 per net revenue in million USD)	%	*Please see figures below*		
Raw water consumption for cooling tower makeup	m^3	327,437	219,132	232,417
Raw water consumption in the fire network	m^3	0	0	0
Raw water consumption for producing filtered water for sale	m^3	0	0	0
Additional intensity rates	%	0	0	0
Total water withdrawal	m^3	1,304,618	779,834	746,478
Raw water withdrawal	m^3	1,235,618	779,758	746,478
Drinking water withdrawal	m^3	0	0	0
Total water discharges	m^3	1,269,298	739,008	707,092

*Notes: 2022 is the reference year for measurements, calculation methodology for Water consumption = Water withdrawal - Water discharged + water used for greening of the lagoons area project. 2025 - water used for greening of the lagoons area project – 5,984 m3

Rompetrol Downstream SRL ensures a sustainable supply of fresh water by complying with the Water Management Authorization issued for each operational site. This includes supplying water from underground wells (benefiting 30 gas stations and 4 warehouses) or accessing municipal drinking water infrastructure (gas stations and 2 warehouses) for various needs such as sanitation, firefighting, and food preparation.

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Indicator	Unit	2022	2024	2025
Total water consumption	m^3	0	0	**0**
Total water consumption in water-scarce areas, including areas with high water stress	m^3	0	0	0
Total amount of recycled and reused water	m^3	0	0	0
Total amount of stored water	m^3	4,021	5,271	5,271
Changes in water storage	m^3	0	0	0
Water consumption intensity (total water consumption in own operations, in m^3 per net revenue in million Ron)	%	*Please see figures below*		
Raw water consumption for cooling tower makeup	m^3	N/A	N/A	N/A
Raw water consumption in the fire network (Firefighting water storage tanks at depots and 25 stations)	m^3	4,021	5,271	5,271
Raw water consumption for producing filtered water for sale	m^3	0	0	0
Additional intensity rates	%	0	0	0
Total water withdrawal	m^3	194,123.43	264,940.28	**246,548**
Raw water withdrawal	m^3	0	0	0
Drinking water withdrawal	m^3	0	0	0
Total water discharges	m^3	194,123.43	264,940.28	**246,548**

Rompetrol Gas

Indicator	Unit	2024	2025
Total water consumption	m^3	7,795.9	6,379.37
Total water withdrawal	m^3	8,289.9	6,975.394
Freshwater	m^3	8,266.00	6,952.1
Drinking water	m^3	23.9	23.294
Total water discharges	m^3	494	596.02

In the case of **Rompetrol Gas SRL**, freshwater represents the water used from the water supply well or from the water supply network of the city/town. In the case of Rompetrol Gas, the water supply source for the Pantelimon and Bacau depots is from wells, and for the Arad depot, the water supply source is from the local water supply network. Drinking water is water that is safe to drink. In the case of the three work sites, drinking water is purchased through orders from the supplier "La Fantana." Total water withdrawal is the sum of FreshWater and Drinking Water.

Total water consumption = total water withdrawal-total water discharged.

Rompetrol Gas SRL operations ensure water supply through comprehensive and compliant methods across various warehouses, using both underground wells and bottled water for human consumption, along with connections to local drinking water networks for sanitary, firefighting, and food production needs.

In the case of **Rompetrol Downstream SRL** and **Rompetrol Gas SRL** the impact on water consumption is significantly lower. Although some maintenance or cleaning operations may take place, they do not involve large volumes of water consumption.

As for **Rompetrol Quality Control SRL**, the volume of water consumption is even lower, as the activities performed are less intensive in water use, being focused on laboratory and administrative activities.

Indicator	Unit	2024	2025
Water consumption	m^3	37.315	57.203
Water withdrawal	m^3	13,641	17,787
Water discharge	m^3	13,604	17,730

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The table below provides a consolidated summary of the main water indicators for 2024 and 2025.

Consolidated Water Indicators*	Unit	2024	2025
Total water consumption	**m³**	**2,563,445**	**3,667,566**
Total water consumption in water-scarce areas, including areas with high water stress	m³	0	0
Total amount of recycled and reused water	m³	633,793	265,101
Total amount of stored water	m³	5,271	5,271
Changes in water storage	m³	0	0
Water consumption intensity (total water consumption in own operations, in m³ per net revenue in million $)	%	688**	833
Raw water consumption for cooling tower makeup	m³	3,038,991	4,522,026
Raw water consumption in the fire network	m³	1,919,333	1,065,556
Raw water consumption for producing filtered water for sale	m³	2,367,055	3,170,861
Additional intensity rates	%	0	0
Total water withdrawal	**m³**	**10,074,853**	**11,724,999**
Raw water withdrawal	m³	9,509,574	11,128,775
Drinking water withdrawal	m³	300,263	349,675
Total water discharges	**m³**	**7,511,408**	**8,063,417**

Certain limitations may affect the calculation of water consumption intensity at consolidated level, primarily related to differences in data collection systems across entities and the integration of environmental data with consolidated financial information.

In 2024, a consolidated overview of the main water indicators was not presented (but separate at entity level); however, the indicators for the Petromidia and Vega refineries account for most of the water consumption. For the current reporting cycle, a consolidated table for both 2024 and 2025 has been included to provide a complete view at group level.

2025 – Water intensity is calculated as total water consumption divided by net turnover, resulting in 833 m³ per USD million revenue (with a total net turnover of 4,404,155,168 USD).

** 2024 – Water intensity is calculated as total water consumption divided by net turnover, resulting in 688 m³ per USD million revenue (with a total net turnover of 3,724,825,212 USD).

2022 – Baseline year – Water intensity is calculated as total water consumption divided by net turnover, resulting in 430 m³ per USD million revenue (with a total water consumption of 2,827,738 m³ and a total net turnover of 6,572,037,534 USD).

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5 RESOURCE USE AND CIRCULAR ECONOMY

ESRS E5

5.1 Concepts and measures related to resource use and circular economy

5.1.1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

ESRS 2 IRO-1

Rompetrol Rafinare SA and its subsidiaries (**Rompetrol)** are included in the **Risk Profile of the KMGI Group**.

The significant impacts, risks, and opportunities of Rompetrol related to circular economy, particularly regarding waste, are identified within the double materiality assessment framework. We have implemented a thorough screening process, identifying actual and potential impacts, risks, and opportunities related to waste within our operations and value chain. Additionally, we have conducted consultations with stakeholders as part of our materiality assessment through an online questionnaire.

Consultations with potentially affected communities are carried out in the permitting procedure of our facilities, as required by the EU EIA Directive, EU IED Directive.

Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the material resource use and circular economy IROs from the double materiality analysis conducted, related to waste management.

5.1.2 Policies

ESRS E5-1

Rompetrol does not have a separate waste management policy, specifically for managing its significant impacts, risks, and opportunities related to the circular economy. However, within the ESG Policy of the KMGI Group, it is stated that the aim is to minimize the environmental footprint by implementing best practices for waste management. Our current policies do not include provisions regarding the transition away from certain resources or the increased use of recycled materials.

Waste management measures are regulated by the current legislation and translated into internal procedures, thus focusing on prevention, mitigation, and remediation of impacts, while also considering identified risks.

Documents related to waste management, including requirements and procedures, are made available to all employees, management, and contractors. Additionally, quarterly environmental updates are published on the Rompetrol website. At the beginning of each year, waste management training materials are distributed to all contractors.

The internal procedures of Rompetrol Rafinare SA, Rompetrol Downstream, and Rompetrol Gas, as well as waste management plans and programs, are part of each company individual integrated management systems for quality, environment, health, and occupational safety, certified in accordance with the ISO 9001 – ISO 14001 – ISO 45001 standards.

For all **Rompetrol** entities, the **QHSE Policy** is implemented, which represents the management's commitment to identifying, assessing, and managing processes and associated risks, including those related to resource management and circular economy. It also involves setting specific objectives and rules for improving the performance of the management system and promoting the adoption of sustainability principles in its operations by minimizing their impact on the environment (including efficient waste management).

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Rompetrol Rafinare SA complies with all regulations regarding waste management, integrating these requirements into its internal protocols and guidelines. This commitment extends to **service providers, subcontractors, and tenants** across both refining platforms through complex contracts, including the Health, Safety, and Environment (HSE) Agreement.

Waste Prevention and Reduction Programs

In accordance with the current legal regulatory requirements, specifically Law no. 17/2023 for the approval of Government Emergency Ordinance no. 92/2021 regarding the waste regime (which transposes European Parliament and Council Directive 2008/98/EC on waste), economic operators conducting commercial or industrial activities for which the competent environmental protection authority has issued an environmental permit/integrated environmental permit, based on the result of a waste audit, are required to prepare and implement a waste prevention and reduction program for waste generated from their own activity or, where applicable, from any product manufactured. This includes measures to identify and adopt actions to reduce prevent and the quantity or hazard of waste generated.

Thus, the individual "Waste Prevention and Reduction Programs" include the measures/actions implemented at 3 entities within Rompetrol, namely **Rompetrol Rafinare SA, Rompetrol Downstream, and Rompetrol Gas SRL.** The main objective is minimizing the negative effects of waste on public health and the environment, primarily through waste generation prevention. Therefore, the development of the individual waste prevention and reduction programs takes into account the following aspects:

- Identification of measures for efficient waste management at the site
- Designing products to optimize the consumption of raw materials and process chemicals (only for **Rompetrol Rafinare SA**)
- Planning the procurement activities of raw materials and chemicals to avoid creating stocks that may lead to depreciation/expiration (only for **Rompetrol Rafinare SA**)
- Establishing measurable objectives
- Utilizing voluntary waste management tools

In accordance with the implemented programs and procedures, within **Rompetrol,** we consider the **waste hierarchy** by implementing a management system that places a strong emphasis on waste generation prevention and resource consumption reduction. First, measures that **prevent waste generation are prioritized**, followed by options that allow for the **reuse** and **recycling of materials**. If these options are not feasible, **energy recovery** from waste is considered. Only as a last resort, when no more sustainable solutions are available, the company considers **waste disposal** through incineration or landfilling (**Rompetrol Rafinare SA**), after a detailed analysis of the available options and, where applicable, conducting technical and economic studies to assess their impact and feasibility.

At the **Petromidia Refinery**, a key component of efficient waste management is the documented procedure that aligns with the Integrated Environmental Permit and other relevant legal frameworks.

This procedure defines the identification of waste categories arising from production and auxiliary activities, ensuring adherence to the waste hierarchy. It includes strategic and cost-effective measures for the recovery and disposal of waste, including those related to the decommissioning of deactivated facilities.

The priority given to avoiding or minimizing waste is addressed through the implementation of measures to prevent waste generation by using the best available technologies (BAT) and by designing products that optimize the consumption of raw materials and process chemicals.

For Rompetrol Rafinare - a contract is in place with an authorized company to meet the annual objectives (as per legislation) related to the recycling of packaging associated with our polymer products placed on the domestic market.

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Rompetrol Downstream successfully implemented the Deposit Return Scheme (SGR) in 2023, supported by documented internal procedures, operational guidelines, and contractual arrangements with authorized scheme operators. Waste generated within the retail network is collected separately in a minimum of two waste fractions, in accordance with applicable legal requirements and internal waste management practices.

In parallel, measures addressing single-use plastics have been progressively integrated into existing environmental management and compliance frameworks, in line with relevant national and EU legislation. While efforts are continuously made to reduce overall waste generation, the level of consumption is partially influenced by customer behavior, which represents an external factor beyond direct operational control. Nevertheless, the company has implemented actions to progressively reduce the volume of single-use plastic placed on the market, ensuring alignment with the provisions of Government Ordinance no. 6/2021 transposing the EU Single-Use Plastics Directive, as well as with broader sustainability and circular economy objectives.

The individuals within **Rompetrol** at the highest level, responsible for implementing policies related to circular economy aspects, are:

- Petromidia and Vega Refineries – General Director
- Rompetrol Downstream – General Director
- Rompetrol Gas SRL – Sole Administrator
- Rompetrol Quality Control SRL – General Manager

5.1.3 Actions

ESRS E5-2

Rompetrol implemented a series of actions and allocated resources to promote the circular economy.

Entities holding environmental permits are engaged for the disposal or recycling of all types of waste, aligning with environmental conservation efforts. The organization has developed a robust waste prevention and reduction strategy, addressing multiple aspects such as efficient waste management practices, product design to minimize the use of raw materials and chemicals, strategic procurement to avoid surpluses and waste, exploring alternatives for waste minimization, setting clear objectives, and adopting proactive waste management approaches.

A prevention and reduction waste Plan for Rompetrol Rafinare SA (with actions to reduce/ reuse materials) - Petromidia is publicly available on the company's website and is submitted to environmental protection authorities.

https://rompetrol-rafinare.kmginternational.com/

Within the Refining Division, waste management prioritizes prevention, aiming to minimize waste generation before it occurs. Initiatives within Rompetrol Rafinare SA's waste reduction program include:

- Evaluating purchased products in terms of lifespan and environmental impact
- Setting consumption norms for raw materials/chemicals/utilities for all processes carried out
- Purchasing chemicals in reusable/recyclable packaging/large volumes/bulk, to reduce the amount of packaging waste generated
- Using renewable catalysts/high-lifespan catalysts/consumables in processes/that allow the recovery of metal compounds
- Identifying alternative methods for the recovery/disposal of the same category of waste

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The waste management protocols, as dictated by legislation, are fully integrated into **Rompetrol Rafinare**'s internal procedures, ensuring specific waste handling practices such as selective collection, proper temporary storage, recovery or disposal of waste by authorized operators, and full traceability of waste from generation to disposal, maintained for at least three years.

Efforts to prevent environmental contamination include the strategic placement of euro containers and designated storage areas to prevent soil and water pollution and reduce air emissions. The Petromidia and Vega platforms are equipped with properly marked containers and storage areas, minimizing environmental impact. **Rompetrol Rafinare SA** also focuses on reducing packaging waste by using reusable containers, bulk chemical procurement, and sustainable or renewable catalysts.

Complete records of waste are maintained for each waste category, with a focus on separating hazardous from non-hazardous waste. Hazardous waste is carefully stored in conditions that protect human health and the environment, preventing accidental pollution or potential health risks. Authorized transporters ensure the traceable transport of waste from origin to final destination, with detailed records kept for a minimum of three years, demonstrating the company's commitment to responsible waste management and environmental protection.

Petromidia Refinery

To effectively manage the complexity of waste management, **Petromidia Refinery** employs a systematic approach that includes the separation of household and production waste, from their generation to final disposal or recovery. The foundation of this system is based on the clear identification and continuous monitoring of waste sources and streams within each department. This responsibility includes documenting the waste categories generated by their respective activities, emphasizing a decentralized yet coordinated effort in waste management.

The platform is fully equipped with euro containers, specialized external zones, and strategically placed concrete platforms near waste generation points. These are designed with temporary storage capacity to accommodate the volume of waste produced between two collection cycles. To facilitate the efficient separation of waste, the containers and collection areas are clearly marked according to the type and category of waste they are designated for.

The refinery's methodical approach is encapsulated in detailed internal procedures and annual plans, particularly in the "Waste Management" procedure and the annual waste management plan. These documents serve as the cornerstone of the waste management strategy and are subjected to rigorous validation through both internal and external audits and inspections. This strategy adheres to the principles of the waste hierarchy: prioritizing waste prevention, preparing for reuse, recycling, other forms of recovery such as energy recovery, and, as a last resort, disposal.

Significantly, **Petromidia Refinery** does not engage in on-site treatment of waste before its disposal or recycling. Instead, a selective collection protocol is implemented based on the nature of the waste, facilitating its temporary storage in properly marked locations while awaiting final disposal or recycling. This step ensures proper waste management, aligning with the refinery's commitment to environmental protection and compliance with current regulations.

External recovery of packaging materials, especially for petrochemical products, underscores the refinery's commitment to sustainability. By using recyclable materials for packaging and establishing a recovery service contract that mandates a recovery rate of at least 60% of all packaging introduced into the market, the refinery strengthens its dedication to environmental protection.

To maintain the integrity of the waste management process, training personnel on legal requirements and best practices is essential. This educational component is very important to ensure that all those involved in waste management are well-informed and capable of performing their responsibilities effectively, thus keeping the waste management process under strict control.

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As part of the waste management information process, regular training sessions are conducted quarterly or semi-annually for all employees, covering environmental aspects such as waste handling, hazardous substances, procedures, and MSDS. Additionally, during shutdowns or maintenance periods, a waste management plan is developed, detailing waste categories, codes, hazards, storage locations, labelling, and transportation methods. This plan is then communicated to all unit managers.

As part of its commitment to operational safety and risk mitigation, Rompetrol Refinery has completed a capital investment project for the acquisition of a 14,000-litre ADR-certified vacuum truck, specifically designed to manage high-density sludge generated during refinery operations in a safe and controlled manner.

This investment enhances the refinery's capacity to prevent and control operational risks associated with sludge accumulation, blockages, and unplanned releases, thereby supporting the prevention of incidents with potential environmental and safety implications. The availability of in-house equipment significantly reduces dependence on external service providers and eliminates the risk of interruptions to critical operations, particularly in emergency situations.

From an economic perspective, the project delivers measurable efficiency gains. Sludge removal costs are expected to decrease by approximately USD 100,000 per year, compared with external service expenditures of around USD 230,000 incurred over the past two years.

The vacuum truck also functions as a backup solution in the event of failure or unavailability of similar equipment, enhancing the refinery's operational resilience and response capability. In emergency scenarios, internal teams can respond immediately, reducing response times and improving overall safety and operational efficiency.

The project included dedicated training for employees responsible for operating the equipment, contributing to the strengthening of internal competencies in emergency response, maintenance, and the safe operation of safety-critical assets.

At Rompetrol Rafinare, we recognize that every aspect of our material usage - from procurement and processing to recycling and disposal - has significant environmental implications. Accordingly, we are committed to implementing sustainable materials management practices that are aligned with international environmental standards and support our long-term sustainability objectives.

A key component of our materials management strategy is the recovery and recycling of operational residues. In 2025, the Company achieved a significant increase in slop recovery volumes, reflecting improved operational efficiency and a strong commitment to waste reduction and resource optimization.

Petromidia Refinery	**2022**	**2024**	**2025**
Recovered slop, tons	10,441	18,203	31,466

This progress in recycled input materials underscores Rompetrol Rafinare's dedication to sustainable practices and the circular economy, contributing positively to environmental protection and resource conservation.

Vega Refinery

At V**ega Refinery**, waste management is a priority, with systems in place to ensure compliance with legal requirements. The platform is equipped with euro containers, specially designed external zones, and optimally placed concrete platforms at the waste generation points. These have adequate temporary storage capacity for the volume of waste generated between collections. The containers are color-coded and marked according to the type/category of waste, facilitating efficient separation and handling.

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Vega Refinery has established contracts with authorized companies for the collection, transport, and recovery/disposal of all waste generated on-site. This includes both hazardous and non-hazardous waste, such as used oil, bitumen waste, sludge from wastewater treatment, contaminated soils, metal scraps, plastic packaging, paper and cardboard, household waste, mineral wool waste, and tank sludge.

The waste management principles applied by the refinery include preventing waste generation whenever possible and ensuring that any waste produced is managed to minimize its environmental impact. This involves applying the waste hierarchy to encourage prevention and efficient waste management, thus reducing environmental effects. Recyclable waste is sorted into categories for recovery, and an active program for preventing and reducing waste generation is in place.

The waste management procedures are documented, covering the flow from generation to recovery or disposal, and include maintaining records for each waste type in compliance with legislation and the Integrated Environmental Permit requirements.

Mixing different categories of hazardous waste, as well as mixing hazardous waste with non-hazardous waste, is strictly prohibited (this restriction is incorporated into our internal procedure). Hazardous waste is clearly defined and temporarily stored in labelled and secured areas to minimize health and environmental risks.

Waste destined for recovery or disposal off-site is transported by authorized companies, with storage practices designed to prevent soil and water contamination and minimize air emissions. The management of historical waste is outsourced to third parties, ensuring compliance with contractual and legislative obligations.

A documented procedure ensures that the waste management process meets the requirements of the Integrated Environmental Permit, correctly identifies waste categories, and follows the waste hierarchy. This procedure also targets the efficient economic recovery or disposal of waste, including waste from decommissioned facilities, and mandates mandatory training for personnel regarding legal requirements to maintain process control.

Waste composition reporting includes detailing hazardous versus non-hazardous waste, waste flows relevant to the sector's activities, and materials present in the waste. All waste management practices are designed to minimize environmental impact, with a strong emphasis on reducing, reusing, and recycling waste whenever possible.

Management of Historical Waste

Vega Refinery's approach to managing historical waste, includes 14 lagoons located on the northern side of the refinery platform, covering approximately 82,450 square meters. These lagoons are designed with containment measures, utilizing compacted soil layers and bentonite to prevent leaks and environmental contamination.

The site primarily hosts acid tar lagoons (pits 7 - 20), where waste from petroleum product tanks, by-products, sludge from petroleum separators, and contaminated soils are temporarily stored. These lagoons have been essential in managing waste that is not directly associated with the refinery's primary production activities but results from auxiliary processes or historical operations.

Specifically, lagoons 7 - 12, covering an area of 15,475 square meters, have reached their maximum storage capacity. These lagoons are partially levelled and partially bordered by embankments due to uneven terrain. Rainwater collected on their surface is pumped into the chemical drainage system for disposal.

Similarly, lagoons 13 - 15 and 16 - 19, with areas of 12,250 square meters and 43,350 square meters, respectively, are interconnected but separated by boundary embankments, some of which have been surpassed by the level of the landfill. These lagoons also store acid tars, with rainwater being collected and pumped into the chemical drainage network.

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Additionally, lagoon 20, located near lagoons 16 - 19 and to the south of them, spans approximately 0.5775 hectares. Like the others, it serves as a temporarily storage area for acid tars, adhering to the refinery's comprehensive waste management strategy.

There is an ongoing project aimed at the remediation of these lagoons, which involves the treatment of existing historical waste and subsequent disposal in impermeable cells in accordance with Order 757/2004.

This initiative is the refinery's commitment to the responsible management of environmental resources, ensuring that the management of historical waste is carried out in a sustainable manner.

In 2025, a total quantity of 19,211.58 tons of waste was treated and subsequently disposed of in Lagoon 17 by a specialized company contracted by Rompetrol Rafinare for the remediation and greening of Lagoons 19 and 20.

Rompetrol Downstream SRL

Rompetrol Downstream SRL has implemented specific measures to minimize the environmental impact of waste, with a particular focus on reducing packaging usage in our food service operations. Products are served on porcelain plates, and packaging for takeaway items is made from biodegradable materials, eliminating the use of plastic bags. This initiative aligns with our commitment to sustainability and waste reduction.

To efficiently manage packaging waste, we collaborate with suppliers specializing in the selective collection of packaging waste, ensuring their practices comply with regulatory standards. This approach is part of our broader strategy to manage packaging responsibly and sustainably. In response to the Single-Use Plastics (SUP) Directive, as transposed into national legislation through GEO 6/2021, we are transitioning to reusable and sustainable alternatives to single-use plastics.

In accordance with Law no. 249/2015, we take responsibility for managing packaging waste within the national territory, aiming to recycle or utilize this waste. This responsibility is transferred to an extended producer responsibility organization authorized to manage packaging waste, ensuring we meet our recycling targets.

Our waste prevention and reduction program includes plans for each worksite to optimize packaging selection and reduce waste. We have engaged local suppliers to collect packaging waste at no cost and contracted an organization to manage our product packaging responsibilities. This ensures traceability of hazardous and non-hazardous waste, with documentation provided for the transport and recovery of these wastes.

The Deposit Return Scheme (SGR) allows consumers to return packaging to any designated return point in Romania, regardless of where the product was purchased. For each returned package, consumers are refunded 0.5 lei, promoting recycling and waste reduction without requiring a shopping receipt. This initiative underscores our commitment to environmental protection and sustainable practices.

2PET number <=1000ml, 348839 pieces

number PET >1000ml, 101298, pieces

number of aluminum cans: 279537, pieces

number of glass containers<=500ml, 117,783 pieces

number of glass containers>500ml, 16,186 pieces

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Single-use plastics 2025 (DWS):

No.	"Single-use plastic products regulated under Article 4, paragraphs (1) and (2) of Ordonanța Guvernului nr. 6/2021 (listed in Part A of the Annex to Government Ordinance No. 6/2021)"	2024		2025	
		Plastic weight (t)	Products (units)	Plastic weight (tonnes)	Products (units)
1	Single-use plastic beverage cups, including their caps and lids, listed in Part A, point 1 of the Annex to Ordonanța Guvernului nr. 6/2021, manufactured entirely from plastic, placed on the market in 2022	17.93	5,955,062	17.93	5,955,062
2	Single-use plastic beverage cups, including their caps and lids, listed in Part A, point 1 of the Annex to Government Ordinance nr. 6/2021, manufactured entirely from plastic, placed on the market in the reporting year	31.52	7,791,305	1.32	756,016
3	Single-use plastic food containers, listed in Part A, point 2 of the Annex to Government Ordinance nr. 6/2021, manufactured entirely from plastic, placed on the market in 2022	3.49	146,241	3.49	146,241
4	Single-use plastic food containers, listed in Part A, point 2 of the Annex to Government Ordinance nr. 6/2021, manufactured entirely from plastic, placed on the market in the reporting year	2.93	300,052	1.55	205,891

Both Rompetrol Downstream and Rompetrol Gas engage in selective waste collection and have contracts with RTOs to meet the targets set by current legislation. All agreements for waste collection, transportation, recovery, and disposal are made with authorized companies.

Also these entities carry out waste audits, internal inspections, and external audits as part of their compliance and sustainability efforts.

At **Rompetrol Gas SRL**, we implement comprehensive waste management practices to mitigate the impact of our operations on the environment. Our approach to waste handling involves separating waste by type into designated containers, located on waste platforms specific to each operational site. Contracts are in place with specialized companies authorized to collect, transport, and either recover or dispose of both hazardous and non-hazardous waste.

Recognizing the significant negative impact that poor waste management has on climate change, air quality, ecosystems, and biodiversity, Rompetrol Gas is committed to managing waste responsibly. Our partnerships with authorized waste management contractors facilitate the monthly collection of waste from our depots, demonstrating our dedication to environmental protection.

A key element of our environmental strategy is the Waste Management Program, which is developed annually and includes initiatives aimed at reducing the volume of waste generated.

Our dual objective is to minimize the depletion of raw materials and reduce the environmental impact of our disposal methods. To achieve this, we explore ways to prevent waste by innovating or improving production processes. Where prevention is not possible, we strive to recover materials or convert waste into energy.

As a waste producer, we bear the ultimate responsibility for its disposal. This responsibility guides us in selecting contractors for waste management, ensuring they meet our strict disposal criteria as outlined in our agreements. The waste reduction plan for each site is formally established at the beginning of the year, and its effectiveness is evaluated through routine internal audits and inspections.

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Therefore, the measures/actions identified and implemented regarding waste within **Rompetrol Downstream SRL** and **Rompetrol Gas SR**L are:

- Signing contracts with authorized companies to take responsibility for packaging management;
- Identifying alternative methods for the recovery/disposal of the same category of waste;
- Evaluating purchased products in terms of their lifespan and environmental impact.

Rompetrol Quality Control SRL

At Rompetrol Quality Control SRL, waste management and reduction are critical aspects of our efforts to protect the environment. Our facilities are equipped with euro containers and specially designed areas, including indoor spaces and concrete platforms, strategically placed near waste generation points. These containers, which have appropriate temporary storage capacity for the interval between two collections, are clearly labelled according to the type of waste they collect, ensuring effective separation and management of waste.

Each department within RQC is responsible for identifying the types of waste generated by their activities and documenting them in a detailed environmental aspects list. Depending on the category, the waste is temporarily stored in designated areas, intended either for disposal or recovery. Our comprehensive waste management approach extends from the initial generation of waste to its final recovery or disposal, with contracts in place with specialized companies.

In accordance with legal requirements and our internal waste management and reduction plans, all waste categories are managed by authorized companies. Our efforts focus on minimizing the impact of waste through strict compliance with legal provisions and the implementation of internal procedures.

Circular economy actions include:

- Returning containers to the supplier/client;
- Reducing waste by ordering reagents according to consumption and shelf life;
- Reusing glass containers.

At **Rompetrol,** the implementation of actions requires significant operational expenses (Opex) and/or capital expenditures (Capex). The effectiveness of your company's actions to address significant impacts, risks, and opportunities, including relevant indicators, is evaluated regularly.

Within **Rompetrol Rafinare SA, Rompetrol Downstream SRL, and Rompetrol Gas SRL**, the necessary resources (significant operational expenses (Opex) and/or capital expenditures (Capex)) are allocated annually to implement the measures/actions required for the responsible and sustainable management of resources/waste.

PEM OPEX, related with management of waste mil USD	Actual			Budget				
	2022	2024	2025	2026	2027	2028	2029	2030
	0.685	0.681	0.713	1.124	1.093	1.123	1.143	1.123

For 2025 domestic waste management costs were as follows: Opex depots Rompetrol Gas SRL: 3,952.00 USD; Rompetrol DWS: 1,576,112 USD.

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5.1.4 Targets

ESRS E5-2

Regarding waste management, within **Rompetrol Rafinare SA, Rompetrol Downstream SRL**, and **Rompetrol Gas SRL**, national targets for waste recovery/recycling are adhered to, as well as obligations related to selective collection. Targets are not linked to a Rompetrol formalized waste policy, the scope is to align to the national targets, and follow national legislation regarding the requirement of a waste reduction program, therefore the stakeholders involved are the Romanian environmental authorities in the compliance review process.

The measurable targets for activities at the **Petromidia Refinery** regarding the waste recovery rate are presented in the table below, being closely linked to the waste prevention and reduction program. The waste recovery rate is an important indicator of the success of a waste prevention and reduction program, serving as a complementary objective for minimizing environmental impact.

Petromidia Refinery	**2022**	**2024**	**2025**	**2030**	**2040**	**2050**
Waste - recovery rate (%)	92%	81%	93%	>90%		
Waste generation rate, kg/t throughput	1.21	1.53	1.85	<2		

* Notes: 2022 is the reference year for measurements.

The total waste recovery rate includes 4,976.46 tons of sludge transferred to an authorised waste management operator for temporary storage pending recovery.

These established targets are absolute values, representing a fixed objective, independent of other factors or external conditions. These percentages are not expressed in relation to other variables. They are directly applied to the total amount of waste produced by the company or organization.

Vega Refinery

There are sludge lagoons on site with historical waste for which there is a remediation plan - permitted by the Environmental Protection Agency, with multi-year clean-up and monitoring measures in place. Clean-up works are scheduled in agreement with EPA Prahova, and monitoring is performed to decide the destination of waste removed/treated on-site.

The measurable targets for activities at the Vega Refinery regarding the waste generated rate are presented in the table below, being closely linked to the waste prevention and reduction program. The waste recovery rate is an important indicator of the success of a waste prevention and reduction program, serving as a complementary objective for minimizing environmental impact.

VEGA	**2022**	**2024**	**2025**	**2030**	**2040**	**2050**
Waste generation rate(tons/kilotons of raw material)	0.60	1.31	0.65	<2		

For **Rompetrol Downstream SRL, Rompetrol Gas SRL, and Rompetrol Quality Control**, measurable, results-oriented, and time-bound targets regarding circular economy aspects have not been established.

Rompetrol monitors the effectiveness of actions to address significant impacts, risks, and opportunities, including waste indicators, as part of the integrated management system analysis.

The progress of action implementation at Rompetrol Rafinare S.A. is reported periodically to management, with waste performance data submitted for the analysis to management.

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The top management of Rompetrol Rafinare S.A., Rompetrol Downstream SRL, and Rompetrol Gas SRL is informed through periodic reports and annually or whenever necessary, reviews the following:

- Waste aspects, IROs and measures included in the integrated management system, in terms of its adequacy and effectiveness
- Opportunities for improvement and necessary changes to waste management practices
- Compliance with the requirements stated in policies/objectives, legislation, and reference standards
- Evaluation of possibilities for improving and changing waste policies, objectives, and targets

5.1.5 Resources outflows

ESRS E5-5

Waste

For **Rompetrol Rafinare SA** and **its subsidiaries**, the total quantities of waste generated, the total quantity and percentage of non-recycled waste, as well as the total quantity of hazardous and radioactive waste generated, are presented in the table below.

	Petromidia Refinery	Vega Refinery	Rompetrol Downstream SRL, tons	Rompetrol Gas SRL, tons	Rompetrol Quality Control	Total (t) 2025	Total (t) 2024
Waste generated (t)	10,870.75	255.43	10,593.09	38.17	48.89	21,806.33	15.283,11
Non-recycled waste (t)	793.52	201.31	9,265.68	27.09	0.10	10,287.70	14.085,51
Non-recycled waste (%)	7.30	78.81	87.5	70.97	0.20	47.18	92,16
Hazardous waste (t)	9,033.13	160.54	50.84	0.40	1.81	9,246.72	4.682,73
Non-hazardous waste	1,837.62	94.89	10,542.25	37.77	47.08	12,560.00	10,600.38
Radioactive waste (t)	0	0	0	0	0	0	0

Additionally, the table below presents both the total quantity by weight for which disposal was avoided, broken down into hazardous and non-hazardous waste, and categorized by the types of recovery operations (preparation for reuse, recycling, and other recovery operations), as well as the quantity by weight intended for disposal based on the treatment type (incineration, landfill, and other disposal operations) of the waste, and the total quantity summing all three types, with a breakdown into hazardous and non-hazardous waste.

Waste Type	Operation Type	Petromidia Refinery (tons)	Vega Refinery (tons)	Rompetrol Downstream SRL, (tons)	Rompetrol Gas SRL, (tons)	RQC (tons)	Total
Recovered Waste							
Hazardous waste	Preparation for reuse	0	0	0	0	0	0
	Recycling	6.53	0	50.84	0	0	50.00
	Other recovery operations	8,462.46	0	0	0.40	1.71	8,464.57
Non-hazardous waste	Preparation for reuse	0	0	0	0	0	0
	Recycling	2,194.69	165.8	10,542.25	11.08	10.12	3,652.42
	Other recovery operations	55.98	0	0	0	0	62.08
Total recovered waste		10,719.66	165.8	10593	11.48	11.83	12,229.07
Waste for disposal							
Hazardous waste	Incineration	174.1	127.64	0	0	0.10	301.84
	Landfill	373.12	39.9	0	0	0	413.02
	Other disposal operations	0	0	0	0.40	0	0.40
Total hazardous waste for disposal		547.22	167.54	0	0.40	0.10	715.26
Non-hazardous waste	Incineration	0.70	0	0	0	0	0.70
	Landfill	245.6	20.78	9256.68	27.09	36.96	9,587.11
	Other disposal operations	0	0	0	0	0	0
Total non-hazardous waste for disposal		246.30	20.78	9256.68	27.09	36.96	9,587.81
Total waste for disposal		793.52	188.32	9256.68	27.49	37.06	10,303.07

*Petromidia Refinery: Hazardous waste in temporary storage (sludge) 4976.46 t.

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The operations of the **Petromidia Refinery** generate a wide range of waste types, classified into hazardous and non-hazardous categories, including: sludge from the wastewater treatment plant and tank cleaning operations, used oils, contaminated soil, insulation materials, and spent chemicals and catalysts (containing metals such as Ni, Co, Mn), recyclable materials such as metals (scrap iron, aluminum), plastics, paper, and non-recyclable waste, including household waste, insulation, and wood.

Rompetrol Rafinare SA applies a waste management policy aligned with the EU waste hierarchy and national waste legislation, prioritising waste prevention, reuse, recycling and recovery over disposal. Hazardous waste streams are managed through authorised operators only, under strictly controlled contractual and regulatory conditions. Temporary storage of hazardous waste pending recovery (operation R13) is used exclusively as an interim measure when immediate final recovery is not technically or operationally feasible.

During the reporting period, Rompetrol Rafinare SA implemented specific waste management actions in relation to the cleaning of crude oil storage tanks, which resulted in the generation of hazardous oily sludge. A total quantity of 4,976 tonnes was transferred to an authorised waste management operator under recovery code R13 (temporary storage pending recovery), in line with applicable legal requirements (Law No. 17/2023 approving Government Emergency Ordinance No. 92/2021 on the waste regime and Commission Decision 2014/955/EU on the list of waste).

At the reporting date – Dec 31, 2025, the waste had not yet undergone a final recovery operation. Once the final recovery treatment is completed, the corresponding quantities will be reclassified and reported under recovered waste flows in the respective reporting period.

The company maintains contractual documentation, waste transfer notes and operator authorisations as evidence of lawful waste management. Once the final recovery operation is executed, the relevant quantity will be reclassified and disclosed as hazardous waste sent to recovery and diverted from disposal in the respective reporting period.

The operations of the **Vega Refinery** generate a wide range of hazardous and non-hazardous waste types, such as used oil, bitumen waste, sludge from wastewater treatment, contaminated soil, metal scraps, plastic packaging, paper and cardboard, household waste, mineral wool waste, and sludge from tanks.

The operations of **Rompetrol Downstream SRL** generate a wide range of waste types, classified into hazardous and non-hazardous categories, including the following: sludge from tanks resulting from tank cleaning, sludge from oil/water separators, oil from oil/water separators, oily water from oil/water separators, paper and cardboard packaging, plastic packaging, metal packaging, glass packaging, packaging containing residues of hazardous substances or contaminated with such substances, absorbents, filtering materials (including oil filters with no other specifications), polishing materials, protective clothing contaminated with hazardous substances, other waste containing hazardous substances, car wash waste, sludge from the treatment of urban wastewater, mixtures of fats and oils from separating water/oil mixtures from edible oils and fats, fluorescent tubes and other mercury-containing waste, edible oils and fats, batteries and accumulators other than 20 01 33, electrical and electronic waste other than 20 01 21 and 20 01 23 with hazardous components, mixed municipal waste.

The operations of **Rompetrol Gas SRL** generate a wide range of waste types, classified into hazardous and non-hazardous categories, which include the following categories: Paper and cardboard; Scrap electrical and electronic equipment, other than those specified in 20 01 21, 20 01 23 and 20 01 35; metals; mixed municipal waste; Plastic materials; Other hydraulic oils; Other engine, transmission and lubricating oils; Packaging that contains residues or is contaminated with dangerous substances; "Absorbents, filter materials (including oil filters, without other specification), materials polishing, protective clothing contaminated with dangerous substances)"; oil filters etc.

The operations of **Rompetrol Quality Control SRL** generate a wide range of waste types, classified into hazardous and non-hazardous categories, including the following: used oil; packaging containing residues or contaminated with hazardous substances; absorbents, filtering materials, protective clothing contaminated with hazardous substances; plastic packaging; paper and cardboard; glass; household waste.

Waste is measured by weighing, with a receipt issued by a metrologically verified scale. The data is recorded and reported to the authorities (Environmental Agency).

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SOCIAL INFORMATION

6 OWN WORKFORCE

ESRS S1

6.1 Strategy and concepts related to the own workforce

6.1.1 Interests and views of stakeholders

ESRS 2 SBM-2

Human resources represent essential intangible assets, relevant for our operations, growth, success and innovation of companies, regardless of their field of activity. In order to fulfil the objectives of the organization, to support economic growth and a high level of services, our companies invest in the identification, attraction, motivation, retention and development of their human capital.

In this regard, Rompetrol is committed to people-centred sustainability that goes beyond immediate operational needs, focusing on long-term impact and meaningful contributions to the industry and the communities in which it operates. The evolving labour market presents ongoing challenges for the energy sector, underlining the need to attract and engage young talent in a context where the industry is perceived as less attractive to emerging professionals, while also effectively managing a multigenerational workforce spanning four distinct working generations. At the same time, the strategic expansion into renewable energy and energy efficiency requires a strong focus on reskilling and upskilling the existing workforce to enable a successful transition. This workforce diversity represents a significant source of value, prompting the company to evolve its leadership model and adopt a more community-centred and inclusive approach, supporting long-term competitiveness, workforce resilience, and sustainable value creation.

Interests and Views of Stakeholders

Rompetrol actively integrates the interests, views, rights, and expectations of its employees—who are key value chain stakeholders—into its business model and strategy. Through structured engagement channels, the company ensures that employee perspectives directly inform decision-making and organizational priorities.

Rompetrol is dedicated to fostering a workplace where employees experience support, inclusion, and opportunities for professional and personal development. The company's HR policies and procedures, as well as the directives of administrative and executive management, are designed to respect employees' rights in line with both international standards (including human and labour rights) and local legislation. Within Rompetrol companies, collective labour agreements (CLAs), internal regulations, and specific procedures govern employee rights, fair treatment, freedom of association, and the prevention of forced labour, child labour, and precarious work.

To ensure dialogue with workforce stakeholders, Rompetrol engages with trade unions and elected employee representatives, informing and consulting them on relevant issues affecting employees. Collective bargaining forms a cornerstone of Rompetrol's social stability plan, helping secure competitive working conditions, equality of opportunity, and fair treatment. Periodic meetings with Unions representatives also allow clarification and joint problem-solving on CLA provisions or ad-hoc employee concerns.

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Integration into Strategy and Business Model

To address workforce-related material impacts, Rompetrol actively integrates employee interests and views into its strategy and business model. Key mechanisms include:

- **Employee Feedback Mechanisms:** Regular satisfaction surveys and annual engagement assessments capture employees' perspectives on workplace environment, career development, work-life balance, and organizational values.
- **Career Development and Learning Opportunities:** Identified employee development needs drive investments in training, upskilling programs, and leadership development initiatives, supporting career progression and skill enhancement.
- **Diversity, Equity, and Inclusion:** Employee's feedback guides the enhancement of diversity, equity, and inclusive practices across the organization.
- **A safety Culture:** Safety of our employees remains a core priority. Rompetrol ensures that all employees operate in a safe, compliant, and controlled working environment through the implementation of a Mandatory and HSE Training Matrix, which defines required training by role, risk exposure, and regulatory requirements. This structured approach supports consistent risk prevention, regulatory compliance, and workforce capability development across operations.
  In 2025, Rompetrol Rafinare launched the Safety Culture Project, aimed at strengthening a robust and preventive safety culture across refinery operations. The initiative combines targeted training, internal communication, monitoring mechanisms, and active employee engagement at all organizational levels. Its objectives are to reduce occupational incidents, increase risk awareness, and promote proactive safety behaviours throughout daily operations. In line with its Health and Safety policy framework, Rompetrol Rafinare promotes preventive risk management through the Proactive Safety Action Awards, a formal recognition program governed by documented procedures and transparent evaluation criteria. The initiative contributes to the mitigation of safety risks by encouraging proactive hazard identification, reinforcing compliance during inspections and audits, and promoting exemplary safety behaviours across refinery activities. Recognition is awarded based on preventive actions and best practices, without linkage to individual performance targets, ensuring alignment with ethical and fair workforce practices. To support these objectives, the program includes three structured competitions, that resulted in 105 awards being granted to employees:
- Best Hazard Observation Card (HOC)
- Best Compliance during Safety Inspections and/or Audits
- Safety Champion Awards

Through these initiatives, Rompetrol ensures that its strategy and business model not only respect but actively reflect the **rights, expectations, and interests of its workforce**, contributing to sustainable organizational growth and the wellbeing of its employees.

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

ESRS 2 SBM 3

The actual and potential impacts on our own workforce which we have identified during our double materiality assessment are connected to our strategy and business model. The following are material risks and opportunities arising from impacts on own workforce linked to our strategic approach and business model.

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Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the material IROs related to our own workforce from the double materiality analysis conducted.

The financial effects on Rompetrol companies in the short, medium and long term of the identified risks and opportunities arising from the impacts on the own workforce are assessed as having a moderate financial effect level (above 0.1% but below 0.7% of the turnover), during the double materiality analysis process.

With regards to Rompetrol material impacts, risks and opportunities, the company includes all people in its workforce who could be materially impacted by the company's business activities that are in the scope of the disclosures, covering its own operations and the value chain. Rompetrol's materially impacted workforce comprises all own work force of the company, In the case of material positive impacts, we included above a brief description of the activities that result in the positive impacts and the types of employees in our own workforce that are positively affected or could be positively affected.

In accordance with current national and international legislation, there is no forced labour or employment of individuals under 16 years of age. In this regard, Rompetrol strictly prohibits the exploitation of minors in its operations and takes measures to prevent such practices in the work of its contractors and suppliers. The Romanian Constitution ratifies the universal and European human rights treaties. The respect for the rights of individuals within our workforce, including human rights and workers' rights, is ensured both through compliance with the Labour Code at all Rompetrol entities, and through the collective labour agreements (CLAs) implemented within Rompetrol companies.

In order to describe the main types of people in our own workforce who are or could be negatively affected, within Rompetrol companies, we developed an understanding of how people with particular characteristics or those working in particular contexts or undertaking particular activities might be at greater risk of harm.

In this regard, in particular, **Rompetrol Rafinare SA** prioritizes the health and safety of its employees first and foremost. This is reflected in complex health and safety protocols, rigorous training programs and regular audits to ensure compliance with international industry standards. In order to achieve and maintain the highest safety standards in all operations, Rompetrol Rafinare SA sets ambitious performance objectives, aimed at promoting a culture of safety at all levels of the organization.

6.1.3 Policies

ES S1-1 RS

KMG International companies, including Rompetrol Rafinare SA and affiliated entities, have adopted policies (QHSE Policy, ISO 45001) to manage our material impacts, risks, and opportunities related to our own workforce. In this regard, we initiated the development and implementation of a Diversity, Inclusion and Belonging (DIB) policy, in line with the KMGI Group's strategy, initiated through adherence to the Romanian Diversity Charter in 2023, aligned with applicable EU legislation. This policy aims to create a diverse, inclusive and supportive work environment for all employees. This reflects our commitment to diversity, inclusion and belonging within the KMGI Group, recognizing these values as essential to driving employee engagement, driving innovation, achieving business success and fostering a collaborative culture.

Rompetrol believes in creating an environment without discrimination, violence and intimidation, in which every individual is valued and respected regardless of sex, race, colour, age, national origin, religion, disability, sexual orientation, marital status or any other protected characteristic by law. Employees who believe they have been subjected to any kind of discrimination or harassment should seek assistance from Group Compliance Department at compliance@rompetrol.com.

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Rompetrol is dedicated to enhancing, protecting and reinforcing its dedication to human rights within its workforce. In this regard, at group level, we implemented inclusive policies, commitments, and mechanisms in accordance with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. We emphasize our commitment through a series of policies and regulations for our employees such as the Code of Conduct, Collective Labour Agreements ensuring enhanced labour and human rights protection, in order to uphold the human rights, including labour rights, of individuals within the company's own workforce. Human Resources policies and procedures, as well as the lines of action of administrative and executive management, aim to respect human rights in accordance with international and local law. All employees have access to the human resources policies and procedures, the Internal Regulation of each company and the Code of Ethics and Business Conduct, available on the intranet. To guarantee excellence in business ethics and the protection of human rights, Rompetrol companies run extensive training programs targeting different segments of its workforce, in order to assure the respect for stakeholders' interests, adherence to the rule of law, compliance with international norms and the support of human rights.

The Group has implemented formal anti-harassment and anti-discrimination policies, coordinated by the Compliance function and aligned with applicable European Union legislation and best practices. Through its Diversity Charter commitments and inclusive recruitment principles, Rompetrol promotes equal opportunity employment and aims to support the inclusion of underrepresented groups, including women, migrants, and persons with disabilities. While the oil and gas industry is characterized by a limited number of roles traditionally associated with these categories, the company continues to promote diversity and equal opportunity principles across recruitment, training, and internal mobility processes.

6.1.4 Processes for engaging with own workforce and workers' representatives about impacts

ESRS S1-2

Rompetrol engages systematically with its own workforce to to identify, assess, and manage actual and potential material impacts, risks, and opportunities related to **Equal treatment and opportunities of all employees** and **Other work-related rights**. This includes matters concerning working conditions, well-being, inclusion, professional development, and respect for labour rights. Employee perspectives are actively considered and integrated into decision-making on workforce-related risks and opportunities, as part of the company's ongoing sustainability due diligence.

Engagement with employees takes place directly, through structured and recurring mechanisms designed to ensure openness, accessibility, and meaningful dialogue across all organizational levels and business segments. These engagement processes occur at multiple stages throughout the year and combine qualitative and quantitative methods, enabling both continuous feedback and targeted consultation.

Key engagement mechanisms include:

- **Multiple annual employee polls and surveys**, conducted anonymously and accessible to all employees, supporting the identification of workforce priorities, strengths, and areas for improvement;
- **One-on-one meetings and feedback forms**, facilitating direct dialogue between employees and line managers or HR representatives;
- **HR Coffee Talks**, held every two months as face-to-face informal meetings and workshops, providing an open forum for employees to raise topics of interest, share ideas, and discuss concerns directly with HR and management representatives;

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- **Rompetrol Business Talks**, organized primarily on a quarterly basis, where senior management communicates strategic directions, key projects, and organizational priorities, and responds to employees' questions;
- **The CEO Business Breakfast** initiative, launched in early October, continues to facilitate open dialogue between the company's top management team and employees.
- **Dedicated business events**, organized on an ad-hoc basis to facilitate interaction between management and employees on specific operational or strategic topics;
- **Non-business community events**, such as children's parties, Sports Academy initiatives, and the Run & Care program, organized annually to strengthen social cohesion, foster informal interaction, and encourage dialogue in a less formal setting.
- In 2025, Rompetrol further expanded engagement initiatives through the **Mentors Academy**, a program dedicated to recognizing and supporting mentors who contribute to knowledge transfer, intergenerational collaboration, and workforce development. The initiative builds on a long-standing mentoring culture and includes annual workshops and experience exchange sessions, involving over 50 colleagues. Each year, more than 70 mentors support development programs such as the Rompetrol Traineeship Program, Rompetrol School, and Dual Education initiatives, contributing to the inclusion and development of young professionals and early-career talent.

Feedback collected through these engagement channels is consolidated and analysed by the Human Resources Department. Based on the results, specific actions and structured intervention plans are defined and implemented at local and Group level. Operational responsibility for ensuring workforce engagement and the integration of outcomes into decision-making lies with the HR Business Partners, under the coordination of the Group HR Director, in close collaboration with department managers.

A variety of programmes have been implemented, including health-focused activities and workshops, flexible working hours and hybrid work-from-home model, that encourage work-life balance. These efforts are intended to create a supportive working environment where employees can sustain their performance while safeguarding their mental and physical health.

To ensure transparency and accessibility of information for the entire workforce, Rompetrol uses multiple internal communication channels, including the intranet platform, Viva Engage (supporting geographically based communities), Radio Vox Pem (the internal radio station at Petromidia Refinery), and a monthly internal magazine.

Rompetrol Downstream engagement initiatives

Within the Downstream segment, Rompetrol implements additional engagement programs aimed at strengthening inclusion, organizational cohesion, and understanding of operational roles.

The **"One Day in a Gas Station"** project, now in its seventh edition in 2025, enables employees from various departments, including senior management, to directly experience the role of a gas station employee for one working day. Since its launch, approximately 400 employees have participated across stations in Bucharest, Constanta, and Ploiesti, with 66 participants in 2025. Through direct involvement in customer service, shop operations, and station maintenance activities, participants gain first-hand insight into operational realities and workforce challenges. The initiative supports cross-functional understanding, strengthens the sense of belonging to the Group culture, and enhances collaboration across departments by integrating frontline perspectives into organizational awareness.

The **Career Celebration Program**, currently in its fifth edition, recognizes long-term commitment and retention within Rompetrol. Across all editions, 185 employees have been acknowledged for reaching career milestones of 15 to 40 years of service, with 20 employees being awarded in 2025. The program formally recognizes employee loyalty and sustained contribution to the organization, reinforcing inclusion, respect, and appreciation for experience and institutional knowledge within the workforce.

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Effectiveness of Workforce Engagement Processes

Information on the effectiveness of Rompetrol's workforce engagement processes is assessed through the analysis of the Group-wide annual employee engagement survey

As part of its commitment to active employee engagement, Rompetrol conducts an annual Employee Engagement Survey, inviting employees to share feedback on leadership, communication, recognition, growth opportunities, and overall workplace experience. Insights from the survey inform targeted action plans designed to address employees' concerns and enhance engagement and satisfaction.

In the reporting year, the entities within scope recorded a **survey participation rate of 77.6 %**, the highest level achieved to date. This level of participation supports the representativeness and reliability of the results and reflects a high degree of employee willingness to engage and provide feedback. Employees contributed both quantitative responses and qualitative comments and suggestions.

The survey results indicate a **high overall engagement score of 86.5%**, demonstrating a strong connection between employees and the company's mission, values, and long-term objectives. The findings reflect a solid level of employee loyalty and pride in belonging to the Rompetrol Group.

The engagement survey is conducted in a **confidential manner**, with strict measures in place to protect the anonymity of individual responses. In addition to quantitative analysis, the survey generated a substantial volume of unique qualitative comments. These inputs were subject to structured qualitative analysis to identify recurring themes, strengths, and areas for improvement. Based on this analysis, targeted improvement measures were defined and integrated into organizational and people-related planning processes.

Based on the survey outcomes, Rompetrol developed the **Group Engagement Action Plan 2025–2026**, comprising short-, medium-, and long-term initiatives aimed at strengthening organizational culture, supporting professional development, enhancing leadership practices, and improving the overall employee experience across the Group. The implementation of the action plan is monitored through internal governance mechanisms and will be reviewed through subsequent annual engagement surveys.Following the Employee Engagement Survey, Rompetrol Gas & Rompetrol Quality Control identified several improvement areas related to employee engagement, transparency and organizational effectiveness. The company implemented concrete actions in 2025 to address the feedback received, demonstrating its commitment to active dialogue with employees and continuous improvement.

Rompetrol Gas:

1. Employees highlighted the need for increased transparency from management, particularly regarding business context, priorities, objectives and performance.

To respond to this feedback, a structured internal communication approach was implemented at Group level. Throughout 2025, management delivered periodic internal communications through emails and Yammer, covering:

- business priorities and strategic objectives;
- key achievements and operational results;
- performance updates and relevant organizational developments.

These actions strengthened transparency and trust between management and employees, improved alignment with business objectives, and supported informed employee engagement. Regular communication contributed to a clearer understanding of the company's strategic direction and decision-making processes.

2. Employees expressed the need for training opportunities particularly in SAP and logistics-related competencies. In response, dedicated SAP and logistics-related courses were included in the 2025 training plan and delivered to the Logistics team.

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3. Cross-functional collaboration and operational understanding

As a first concrete measure, a QHSE representative was permanently transferred from HQ to the Pantelimon warehouse during 2025. The permanent presence of a support function representative at operational level enhanced communication, enabled faster issue resolution, and improved understanding of operational realities in the area of health, safety and environment.

Starting from the employee feedback in engagement survey, Rompetrol Downstream launched the HR Connect Program, a structured HR ticketing system that enables employees to submit HR-related questions through a dedicated digital form. The program aims to enhance transparent and timely communication and ensure consistent access to HR information and support.

Submitted requests are managed centrally by the HR team, with responses provided within approximately five working days, or up to seven working days when additional review is required. Where necessary, subject-matter experts are involved to ensure accurate and aligned responses.

As a response to the insights gathered through the Employee Engagement Survey, we launched the Energize U program, an organization-wide learning initiative designed to support sustainable workforce development. Through the systematic evaluation of engagement survey results, qualitative feedback, and the implementation of targeted actions, Rompetrol improves its workforce engagement processes. These initiatives demonstrate how employee input is translated into concrete measures that strengthen engagement, support employee development, and contribute to a sustainable, inclusive, and people-centered business model.

Within the social stability plan, collective bargaining plays a central role in ensuring decent work and equal opportunities and treatment. As part of the social dialogue framework, periodic meetings are held with trade union and/or employee representatives to discuss and clarify the implementation of Collective Labour Agreement (CLA) provisions, as well as any ad hoc requests raised by represented employees. Negotiations for the Collective Labor Agreement (CLA) are conducted every two years, or annually in the case of an extension, in full compliance with applicable legislation, including Law no. 367/2022 on social dialogue. All legally entitled parties participate in the negotiation process based on demonstrated representativeness, ensuring a structured and transparent collective bargaining framework. Management ensures that employees are informed in a timely and transparent manner about the outcomes of negotiations, including the conclusion or extension of the Collective Labor Agreement, the introduction of new benefits, enhancements to existing benefits, and collective wage adjustments.

The Rompetrol Rafinare SA's Internal Regulations were developed in consultation with the union, and any subsequent amendments are subject to the same consultation process. The Internal Regulations have been reviewed to align with the latest legal requirements and are formally consulted with union representatives. The organisation offers well-being programmes to all employees and encourages regular participation to support a healthy balance between work and personal life. Employee feedback plays a central role in shaping these initiatives, with programmes continuously adapted to reflect evolving needs and expectations. Activities are organised at local workplace level and tailored to employees' interests and hobbies, allowing participation based on shared preferences. Updates are communicated through internal and external channels to demonstrate how employee input has informed decisions and programme development.

Moreover, within Rompetrol Rafinare SA, formal management routines are embedded across operational and governance levels, including daily operational meetings, weekly management meetings, and monthly health and safety meetings. These meetings serve as structured mechanisms for monitoring workforce-related topics, identifying risks and improvement areas, and defining corrective and preventive actions with assigned responsibilities and deadlines. The outcomes are systematically documented and communicated to relevant stakeholders for implementation and follow-up, supporting ongoing monitoring, accountability, and continuous improvement in workforce engagement and working conditions.

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6.1.5 Processes to remediate negative impacts and channels for own workers to raise concerns

ESRS S1-3

Rompetrol companies have implemented a Whistleblower Policy that aimed to encourage the company's employees to report irregularities that could affect the company. The Whistleblower Policy enable every employee, supplier, customer, collaborator or any other third party accountable to honestly report concerns or complaints, ensuring confidentiality and protection from retaliation for those who use the whistleblowing channel. The process of investigating these complaints is both professional and objective, adhering strictly to Romanian Law no. 361/2022, which implements EU Directive 2019/1937 on the protection of whistleblowers. Through ensuring that all complaints are treated with strict confidentiality and thoroughly investigated in a professionally manner, the company endeavours to ensure that its workforce is aware of and trusts the provided channels.

Our company is committed to maintaining an effective whistleblower mechanism that fosters trust, transparency, and accountability. To ensure the effectiveness of our reporting channels, we implement the following measures:

- all complaints can be made Anonymous (if desired) and are handled with strict confidentiality, ensuring that whistleblowers remain protected from retaliation.;
- tracking and monitoring issues raised is performed in a database/ register where all complaints are being recorded and tracked, containing details as nature of the complaint, description, result and responsible
- reports on cases performed are being presented to the management and BOD.

Reporting channels managed by Group Compliance Department Team members are the following:

- Whistleblower Channel (speakup@rompetrol.com) – also accessible from external via KMGI's official websites
- e-mail address (compliance@rompetrol.com)
- Or directly by e-mail/in written to the members of the Group Compliance Department Team=;

Concerns about unethical or unlawful behaviour and matters related to integrity or breaches of our rules and internal regulations are reported using e-mail (whistleblower channel) in a strictly confidential manner. The concerns are addressed, internal investigations performed, and results are reported.

According to internal regulations, Group Compliance Department perform a preliminary analysis of the reported complaint and if the concern/complaint is grounded, the complaint together with the preliminary analysis results are sent to Forensics, being the department in charge with performing the investigations.

There are also other channels available for employees to raise concerns like: Suggestion boxes in Refinery - managed by Internal communication.

QHSE Department also has a process of managing the complaints related to QHSE issues.

The Internal Regulations of **Rompetrol** companies set out the rights and obligations of the employees and of the employer, including rules on non-discrimination and infringement of the human dignity, avoiding conflict of interest, disciplinary procedure of the employees and is signed by them for acknowledgement of its provisions. As part of actions that can minimize the potential conflicts among employees is the implementation of different programs of training and development, aimed to develop both soft and technical skills for a better integration and better professional results.

Furthermore, at group level, the Group Compliance Department supports the availability of these reporting channels by conducting awareness campaigns and trainings with employees.

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Also, at the level of **Rompetrol Rafinare SA,** Group Compliance Department play an essential role in ensuring the best practices in the development and application of policies and regulations regarding the respect of human rights. For example, Current Pay & Benefits Procedure intends to set a comprehensive framework for establishing and adjusting the compensation elements and to provide the line management with a useful tool to ensure its consistent implementation (in terms of pay movements and related decisions), while maintaining the internal equity and external competitiveness.

6.1.6 Actions

ESRS S1-4

At Rompetrol, we have taken, planned or are currently implementing a series of actions in order to prevent or mitigate any material adverse effect on our employees. Following our internal surveys, we update the HR action plan and allocate funds for projects to address potential adverse effects on our employees (including, but not limited to additional trainings, exit interviews etc.).

The Internal Regulations are regularly reviewed and updated to ensure compliance with the latest legal requirements and are formally consulted with union representatives.

These actions contribute to the effective management of material impacts, risks, and opportunities related to Equal treatment and opportunities of all employees and Other work-related rights, ensuring that workforce-related matters are addressed through structured governance and social dialogue mechanisms. Furthermore, these initiatives are designed to support the achievement of the following Sustainable Development Goals:

- Gender equality. **Rompetrol** is dedicated to promoting gender equality and equal opportunities within the company and in the communities where we operate. This commitment is reflected in our policies and practices, which aim to ensure equal opportunities for leadership, employment, and training.
- Workplace equality: implementation of policies to ensure equal pay for equal work, promote women into leadership positions, and support work-life balance initiatives.

As part of its approach to preventing negative impacts on its own workforce, Rompetrol continuously reviews and improves working conditions based on issues and concerns raised by employees through formal channels. Measures implemented include flexible working arrangements and work-from-home options, which are designed to reduce work-related strain, support work-life balance, and address potential sources of workplace tension identified through employee feedback.

Recognising the importance of work–life balance in supporting employee well-being, the organisation developed the Well Station global platform, which brings together all well-being initiatives within a single, integrated framework. Inspired by the company's profile, the gas stations being one of the most known symbols, Well Station is a program to inspire energy, a pit stop for all employees to refill with well-being, mindfulness & good information about health, a source of fuel for a better life. Well Station consists of three pillars:

- Emotional and social well-being
- Physical well-being
- Financial well-being

Under the three pillars, we mapped and implemented programs such as: family and care events, stress management and mindfulness, hobbies and cultures, themed workshops, health education and prevention, nutrition and hydration, financial coaching and education, financial contribution for extraordinary life circumstances.

- Given the nature of its oil and gas operations, which involve the handling of hazardous substances, Rompetrol implements comprehensive occupational health and safety measures — including personal protective equipment, mandatory safety training, and periodic medical

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surveillance — to prevent work-related injuries and occupational diseases, mitigate risks to employees and the community, and maintain high standards of operational safety and product quality.

- To prevent and mitigate any negative HSE impacts, the company conducts risk assessments covering all the elements from workplace safety, industrial and process safety and environmental impacts to control and minimize the risks for workforce, contractors, general public and communities. Rompetrol also conducted Process Hazard Analysis for the industrial sites. The HAZOP Studies resulted in concrete actions aiming to decrease the major accident hazards.
- The organisation provides a competitive and well-structured reward package to attract high-calibre professionals and retain experienced employees. Alongside financial rewards, a range of healthcare programmes and additional benefits are offered to support employee well-being, strengthen motivation, and sustain high levels of performance. Together, these measures contribute to greater workforce stability by improving engagement and reducing employee turnover.
- A key element of this approach is the systematic use of external benchmarking, with annual salary surveys conducted in collaboration with reputable consulting firms to monitor market trends and ensure continued competitiveness of reward practices.
- Alongside this, the organisation has implemented a structured portfolio of recognition initiatives aimed at valuing employee contributions and reinforcing commitment. Programmes such as *Career Celebration*, *Employee of the Year*, the *Thank You* project are designed to acknowledge both individual and collective achievements, strengthen organisational loyalty, and support the long-term retention of talented and high-performing employees. Attracting and hiring skilled professionals in the energy sector is increasingly challenging and complex due to the high level of specialization, technical competence, and strict safety requirements involved. The industry requires individuals with solid engineering and operational capabilities, as well as the flexibility to perform effectively in a wide range of working conditions. As a result, the number of suitably qualified candidates remains limited.

Without proactive steps to maintain a continuous flow of talent, we may encounter significant workforce gaps that could negatively affect operational performance, project delivery schedules, and our capacity to respond to client and market expectations. To address this risk, our company is committed to developing a long-term talent pipeline through initiatives such as Traineeship programs, Upskilling and Reskilling, technical practice, and dual learning projects.

Over time, we have also established strong collaborations with universities and high schools, enabling us to connect more effectively with both high school and university students. These efforts help build a strong, sustainable workforce, keep operations running smoothly, and strengthen our position in the energy industry.

Traineeship Programs

The Traineeship programs implemented in Rompetrol Rafinare and Rompetrol Quality Control play an essential role in supporting the growth and long-term sustainability of our community, serving as a key channel for attracting talent to the highly specialized and niche positions within the Petromidia and Vega refineries. In an industry where specific competencies are crucial, these programs provide recent graduates with a well-structured learning framework tailored to the precise needs of our operations. Through focused mentorship and hands-on experience, trainees develop the practical skills required in our working environment, enabling a smooth transition into permanent roles within the company. In order to attract potential candidates, we also organize workshops and presentations within universities, strengthening our engagement with academic institutions.

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In 2025, the Together We Grow Traineeship Program reached its 25th edition, a milestone anniversary that brought together 30 trainees. Over the course of these 25 editions, more than 2,000 students and graduates have participated in the program. To ensure we achieve meaningful results over time, we closely monitor the progress of our Traineeship program – we evaluate the number of Trainees that we have recruited and how many of them remain with the company after completing the program. This year we selected 18 Trainees (15 in Rompetrol Rafinare and 3 in Rompetrol Quality Control) and 14 of them became our colleagues at the end of the program.

Practice

We are committed to supporting the next generation of specialists, actively contributing to the training and development of future professionals in the industry. We have a strong tradition of organizing interactive sessions with students interested in the energy sector, such as Open Doors and Energy Talks, providing them with a space to explore career-relevant topics, learn from industry professionals, and develop essential skills.

These activities are designed to enhance key competencies for entering the job market, equipping students with tools for self-assessment, career orientation, and building confidence in their abilities. The sessions include guidance on preparing professional documents, work style analysis, and practical exercises aimed at improving communication and adaptability in a professional environment.

In addition, this year we expanded our partnership with Joblandia, a platform that builds bridges between high schools and companies by offering high school students a realistic perspective on the professional environment. As part of this collaboration, we organized site visits for students to our headquarters and the Vega Refinery in Ploiesti. In 2025, there were approximately 107 high school students and 49 university students in practice

Dual Learning

One of our responsibilities is to support students and provide them with the necessary guidance to become the next generation of professionals we need. Our dual education programs reflect Rompetrol's commitment to investing in education and building bridges between school and the professional environment. Thus, in 2025, we continue to support the dual education class, which has now reached the 10th grade, at the Constanta Energy High School. The class was initiated and is supported by Rompetrol Rafinare and brings together 23 high school students specializing in the electrical field, trained to become low-voltage electricians and electricians in relay protection, automation, and measurements.

Additionally, this year the Rompetrol community grew with the establishment of superior dual education group at Ovidius University of Constanta, initiated and supported by Rompetrol Rafinare. The program includes 15 students specializing in Environmental Engineering in the Chemical and Petrochemical Industry.

The dual education system combines theoretical training in high school or university with technical practice within Rompetrol Group companies. Students benefit from practical training, access to modern equipment and technologies and personal development workshops. To ensure its effectiveness, we continuously monitor key aspects - we keep track of high school students' attendance in classes, their grades for scholarship eligibility, and their engagement in the practice component of the program. In this case, the success metric is retention of the high-school students, from 24 high school students enrolled in 2024, 23 continue their dual education studies in 2025 also. Additionally, all the high school students received the scholarship and the attendance at practice classes was 100%.

Rompetrol school - The first step towards a refining profession

Launched in 2022, the project reflects our commitment to fostering enthusiasm for working at the Petromidia refinery, sharing the unique aspects of refinery operations, and contributing to the development of a new generation of specialists.

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The program is designed to prepare participants for the roles of Field Operator and Compressor Operator. Over a four-month period, trainees build and strengthen both theoretical and hands-on skills, guided by experienced colleagues.

Supported by more than 30 Rompetrol mentors - including Operators, Plant Managers, and Process Engineers - participants enhance their technical expertise and receive comprehensive guidance to support their transition into future professionals in the field.

The chemist operator role requires a strong combination of theoretical understanding, hands-on experience, and a high level of discipline and precision. To support this, graduates of the “Rompetrol School” qualification and requalification program will further develop their professional competencies over a period of 6 to 12 months within the refinery’s technological units, benefiting from ongoing supervision and assessment by production unit managers, foremen, and process engineers.

To ensure the effectiveness of the program, we measure effectiveness as for the Traineeship program. We consider how many participants we had in the program and how many of them remain after completing the program. In 2025, there were 25 participants enrolled and the exact number of future professionals hired within the company will be known in the first quarter of 2026.

We plan to further develop our initiatives, placing greater emphasis on programs that deliver tangible benefits for high school students. By maintaining and expanding projects that provide early exposure to industry skills and career opportunities, we seek to generate positive outcomes for both our organization and the communities in which we operate.

To strengthen workforce capabilities, Rompetrol continues to invest in training tools and development programs that enhance operational readiness and risk awareness. A key initiative is the Operator Training Simulator (OTS), which supports operational staff in developing technical competencies, decision-making skills, and confidence required for both routine operations and high-risk scenarios, including plant startups, shutdowns, and abnormal operating conditions.

These scenarios represent periods of elevated safety risk, during which the likelihood of major incidents increases significantly. By enabling realistic, scenario-based training in a controlled environment, the OTS contributes to incident prevention, strengthens safety performance, and supports a preventive safety culture across operations.

6.1.7 Metrics and targets

ESRS S1-5

Rompetrol companies have established human resources–related targets at entity level, reflecting their specific operational context, workforce profile, business objectives and identified material impacts, risks and opportunities. Where such targets are in place, they cover key aspects related to own workforce matters, including working conditions, health and safety, employee development and engagement, and are communicated internally and discussed, as applicable, with trade unions and/or employee representatives.

The process for setting workforce-related targets is coordinated by management/ HR at entity level, and takes into account applicable legal requirements, internal policies, historical performance, benchmarking where relevant, and feedback from employees and their representatives. Stakeholder engagement, including dialogue with unions and employee representatives, forms part of this process where required by law or internal governance practices.

Performance against workforce-related targets and indicators is monitored on a regular basis at entity level, with results reported to management. Entity-level targets and performance data are subsequently consolidated at KMGI Group level, providing an aggregated view of workforce performance and progress across the Group, while preserving the relevance and proportionality of targets at entity level.

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KMG International set as main HSE indicator Lost Time Injury Rate with a target of 13% decrease versus previous year. This was cascaded to all of the Group's entities (including Rompetrol Rafinare and its affiliated entities).

Overall KMGI Group achieved this target in 2025 managing to decrease the LTIR indicator with 55% versus 2024 figure.

Even under the conditions mentioned above, Rompetrol considers the possibility of revising the targets in 2026, either by adding new indicators or/and revising the existing ones after consultations with internal stakeholders, meaning that workers' representatives are engaged in the process.

We plan to maintain an adequate payment of the employees, and we continue to make the annual benchmarking with the specific Oil & Gas market, as well as ensuring health protection to the employees through life and health insurance and prevention and prophylaxis medical services.

KPI Rompetrol Rafinare	Base year 2022r	Actual 2024	Actual 2025	Target 2025	Target 2030	Target 2040	Target 2050
Average training hours per year per employee	39.85	22	23.49	31	33	40	45
Percentage of total employees covered by collective bargaining agreements	100%	100%	100%	100%	100%	100%	100%
Percentage of total employees with labour contract	100%	100%	100%	100%	100%	100%	100%
Share of women at management level (mid & top management positions)	27%	28%	27%	30%	33%	33%	33%
Ratios of standard level wage compared to local minimum wage	>100%	>100%	>100%	>100%	>100%	>100%	>100%
Percentage of employees receiving regular performance and career development reviews	>98%	95.1%	94.43%	>98%	>98%	>98%	100%

KPI Rompetrol Downstream	Base year 2022	Actual 2024	Actual 2025	Target 2025	Target 2030	Target 2040	Target 2050
Average training hours per year per employee	3	14	21	8	10	12	14
Number of employees that received one or multiple training sessions	19%	80%	60%	70%	75%	80%	85%
Percentage of total employees covered by collective bargaining agreements	100%	100%	100%	100%	100%	100%	100%
Percentage of total employees with labour contract	100%	100%	100%	100%	100%	100%	100%
Share of women at management level (mid & top management positions)	33%	34%	35%	34%	34%	35%	36%
Ratios of minimum wage in entity compared to national minimum wage	>100%	>100%	>100%	100%	100%	100%	100%
Percentage of employees receiving regular performance reviews	98%	100%	98%	>98%	> 98%	> 99%	100%

KPI Rompetrol Gas	Base year 2022	Actual 2024	Actual 2025	Target 2025	Target 2030	Target 2040	Target 2050
Average training hours per year per employee	23	47	49	47	48	49	50
Number of employees that received one or multiple training sessions	72%	59%	97%	60%	65%	75%	85%
Percentage of total employees covered by collective bargaining agreements	100%	100%	100%	100%	100%	100%	100%
Percentage of total employees with labour contract	100%	100%	100%	100%	100%	100%	100%
Share of women at management level (mid & top management positions)	14%	33%	33%	33%	33%	33%	33%
Ratios of minimum level wage compared to national minimum wage	>100%	>100%	>100%	100%	100%	100%	100%
Percentage of employees receiving regular performance reviews	96%	99%	100%	99%	99%	99%	100%

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To enable comparability over time, we maintain stability in our targets by ensuring consistent definitions and methodologies. The targets are based on our Company's commitments, including our Codes of conduct, sourcing policies, global frameworks, forming the foundation for our commitment.

6.2 Diversity and equal opportunities

6.2.1 Characteristics of the undertaking's employees

ESRS S1-6

In 2025, Company Rompetrol Rafinare and its subsidiaries employed a total of 1,858 employees, distributed across all six entities. Employee data was reported as the average headcount for the reporting period. At Rompetrol level, the company aims to maintain a balanced workforce structure in terms of age groups and gender categories; however, considering the operational nature of its activities, male employees represent **69.7%** of the **total headcount, while female employees account for 30.3%.**

Gender	Headcount 2024	Headcount 2025
Female	587	564
Male	1,301	1,294
Total	1,888	1,858

*Number of employees represent average headcount.

Number of employees by gender and entity

Gender	Year	Rom Oil S.A.	Rompetrol Downstream S.R.L.	Rompetrol Gas S.R.L.	Rompetrol Logistics S.R.L.	Rompetrol Quality Control S.R.L.	Rompetrol Rafinare S.A.	Grand Total
Female	2024	2	150	12	2	160	261	587
	2025	2	140	12	2	155	253	564
Male	2024	5	306	81	-	31	878	1,301
	2025	5	294	82	-	35	878	1,294
Total	**2024**	**7**	**456**	**93**	**2**	**191**	**1,139**	**1,888**
	2025	**7**	**434**	**94**	**2**	**190**	**1,131**	**1,858**

The evolution of the total percentage of female employees within the company registers a constant trend, this being mainly determined by the specifics of the jobs in the activity sector, whose particularities of availability and effort are addressed more to men.

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Number of employees and type of employees

	2024 (restated)		2025	
	Female	Male	Female	Male
Number of employees (head count)	587	1,301	564	1,294
Number of permanent employees (head count)	529	1,194	518	1,205
Number of temporary employees (head count)	58	107	46	89

Most of the employees have a permanent employment contract, and 99.26% of the contracts are full-time (full-time being 40 hours/week).

In prior year Sustainability report, the Group made an error of presentation by switching the number of female and male for 2024.

Number of employees by contract type and by gender

FEMALE		MALE		TOTAL	
2024 (restated)	2025	2024 (restated)	2025	2024 (restated)	2025
Number of employees (head count)					
587	564	1,301	1,294	1,888	1,858
Number of permanent employees (head count)					
529	518	1,194	1,205	1,723	1,723
Number of temporary employees (head count)					
58	46	107	89	165	135
Number of non-guaranteed hours employees (head count)					
-	-	-	-	-	-
Number of full-time employees (head count)					
584	562	1,290	1,282	1,874	1,844
Number of part-time employees (head count)					
2	2	12	12	14	14

* Gender is the one mentioned by the employees themselves

In the previous year's Sustainability Report, a minor presentation inconsistency occurred, whereby the figures for female and male employees were switched across certain contract categories for 2024.

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Number of employees by contract type and entity

		Rom Oil SA	Rompetrol Downstream SRL	Rompetrol Gas SRL	Rompetrol Logistics SRL	Rompetrol Quality Control SRL	Rompetrol Rafinare SA	TOTAL
Number of employees (head count)	2024	7	456	93	2	191	1,139	**1,888**
	2025	7	434	94	2	190	1,131	**1,858**
Number of permanent employees (head count)	2024	7	432	90	2	165	1,027	**1,723**
	2025	7	412	92	2	168	1,042	**1,723**
Number of temporary employees (head count)	2024	-	24	3	-	26	112	**165**
	2025	-	22	2	-	22	89	**135**
Number of non-guaranteed hours employees (head count)	2024	-	-	-	-	-	-	**-**
	2025	-	-	-	-	-	-	**-**
Number of full-time employees (head count)	2024	1	455	91	2	190	1,135	**1,874**
	2025	1	433	92	2	189	1,127	**1,844**
Number of part-time employees (head count)	2024	6	-	2	-	1	5	**14**
	2025	6	1	2	-	1	4	**14**

During 2025, a total number of 129 employees left the companies in scope, either voluntarily (resignations), or due to dismissal, retirement or death from natural causes. The staff turnover rate is calculated as the number of departing employees compared to the average number of employees in the reporting period (average headcount). The staff turnover rate was 7%, which is a slight increase compared to the previous year (the staff turnover rate for 2024 was 5.77%) due to processes streamlining inside Rompetrol Downstream SRL. In Rompetrol Downstream were implemented organizational adjustments, including changes in management roles, updates to the Hybrid Work Program related to office-based working arrangements, and initiatives to further improve organizational efficiency within the Commercial and Retail Network Operations departments. These actions were undertaken in the context of ongoing efforts to ensure effective governance, operational continuity, and workforce organization.

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Employee turnover by entity

Entity		Headcount	Leavers	Turnover (%)
Romoil SA	2024	6.83	-	0%
	2025	7	-	0%
Rompetrol Downstream SRL	2024	455.42	32	7%
	2025	434	60	14%
Rompetrol Gas SRL	2024	92.67	6	6%
	2025	94	6	6%
Rompetrol Logistics SRL	2024	2.00	-	0%
	2025	2	-	0%
Rompetrol Quality Control SRL	2024	190.92	12	6%
	2025	190	10	5%
Rompetrol Rafinare SA	2024	1,139.67	59	5%
	2025	1,131	59	5%
TOTAL	2024	**1,887.51**	**109**	**5.77%**
	2025	**1,858**	**135**	**7%**

Note: Internal movements of employees between companies part of Rompetrol Rafinare Group are not counted in leavers number.

All information regarding the number of employees is reported as the average headcount for the reporting period, calculated based on the monthly headcount indicator calculated at company level. The headcount is calculated according to the methodology agreed at the company level, based on the information exported monthly from the payroll system.

All the calculated data related to the employed personnel are concrete data, not estimates.

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6.2.2 Diversity metrics

ESRS S1-9

Top Management at Rompetrol include senior managers within the organization that are responsible for strategic direction and organizational leadership.

In preparing the disclosure on gender at top management, Rompetrol used the definition of top management as one and two levels below the administrative and supervisory bodies.

Top Management Gender Summary

		Female	Male	Total
Number	2024	7	4	**11**
	2025	5	5	**10**
%	2024	63%	37%	**100%**
	2025	50%	50%	**100%**

Top Management – Gender by Entity

Entity		Number			%		
		Female	Male	Total	Female	Male	Total
Rompetrol Downstream SRL	2024	4	1	5	81.82	18.18	100
	2025	3	1	4	77	23	100
Rompetrol Gas SRL	2024	-	1	1	0	100	100
	2025	-	1	1	0	100	100
Rompetrol Quality Control SRL	2024	1	0	1	100	0	100
	2025	-	-	-	-	-	-
Rompetrol Rafinare SA	2024	2	2	4	46.67	53.33	100
	2025	2	3	5	41	59	100
Total	2024	**7**	**4**	**11**	**63**	**37**	**100**
	2025	**5**	**5**	**10**	**50**	**50**	**100**

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Distribution of employees (headcount) by age:

		Under 30 years old	30–50 years old	Over 50 years old	Total
Number	2024	272	787	829	**1,888**
	2025	266	788	804	**1,858**
%	2024	14%	42%	44%	**100%**
	2025	14.3%	42.4%	43.3%	**100%**

Entity			Under 30 years old	30–50 years old	Over 50 years old	Total
Romoil SA	2024	Number	-	4	3	7
	2024	%	0%	56%	44%	100%
	2025	Number	-	3	4	7
	2025	%	0.0%	42.9%	57.1%	100%
Rompetrol Downstream SRL	2024	Number	42	296	117	455
	2024	%	9%	65%	26%	100%
	2025	Number	34	278	122	434
	2025	%	7.7%	64.2%	28.1%	100%
Rompetrol Gas SRL	2024	Number	6	47	40	93
	2024	%	6%	50%	44%	100%
	2025	Number	5	47	42	94
	2025	%	5.1%	49.6%	45.3%	100%
Rompetrol Logistics SRL	2024	Number	-	-	2	2
	2024	%	0%	0%	100%	100%
	2025	Number	-	-	2	2
	2025	%	0.0%	0.0%	100%	100%
Rompetrol Quality Control SRL	2024	Number	40	68	83	191
	2024	%	21%	36%	44%	100%
	2025	Number	39	74	77	190
	2025	%	20.8%	38.8%	40.4%	100%
Rompetrol Rafinare SA	2024	Number	184	372	584	1,140
	2024	%	16%	33%	51%	100%
	2025	Number	188	386	557	1,131
	2025	%	16.6%	34.1%	49.3%	100%
TOTAL	2024	Number	**272**	**787**	**829**	**1,888**
	2024	%	**14%**	**42%**	**44%**	**100%**
	2025	Number	**266**	**788**	**804**	**1,858**
	2025	%	**14.3%**	**42.4%**	**43.3%**	**100%**

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6.3 Fair and secure working conditions

6.3.1 Collective bargaining coverage and social dialogue

ESRS S1-8

The Collective Labor Agreement (CLA) provisions are applicable to all employees of the companies.

Entity		Headcount	Employees covered by CLA	CLA coverage (%)
Romoil SA	2024	6.83	6.83	100%
	2025	7	7	100%
Rompetrol Downstream SRL	2024	455.42	455.42	100%
	2025	434	434	100%
Rompetrol Gas SRL	2024	92.67	92.67	100%
	2025	94	94	100%
Rompetrol Logistics SRL	2024	2.00	2.00	100%
	2025	2	2	100%
Rompetrol Quality Control SRL	2024	190.92	190.92	100%
	2025	190	190	100%
Rompetrol Rafinare SA	2024	1,139.67	1,139.67	100%
	2025	1,131	1,131	100%
TOTAL	2024	**1,887.51**	**1,887.51**	**100.00%**
	2025	**1,858**	**1,858**	**100%**

Out of the total number of employees, 67% are registered in one of the legally established trade unions that operate at the company level.

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Entity		Headcount	Union Members	Trade Unionization rate (%)
Romoil SA	2024	6.83	-	0%
	2025	7	-	0%
Rompetrol Downstream SRL	2024	455.42	167.25	37%
	2025	434	173	40%
Rompetrol Gas SRL	2024	92.67	69.33	75%
	2025	94	70	75%
Rompetrol Logistics SRL	2024	2	1	50%
	2025	2	1	50%
Rompetrol Quality Control SRL	2024	190.92	156.16	82%
	2025	190	156	82%
Rompetrol Rafinare SA	2024	1,139.67	863.58	76%
	2025	1,131	852	75%
TOTAL	2024	**1,887.51**	**1,257.32**	**67%**
	2025	**1,858**	**1,252**	**67%**

6.3.2 Adequate wages

ESRS S1-10

Recognising that fair and competitive compensation is a cornerstone of employee satisfaction, motivation, and long-term retention, the organisation is committed to designing a pay structure that accurately reflects the value of individual's contributions. As a result, all employees receive remuneration in line with the industry, ensuring their efforts are recognised and rewarded appropriately.

Salary determination is carefully aligned with the responsibilities outlined in each job description, while also taking into account national market benchmarks for comparable roles. The process evaluates not only the tasks performed but also the level of responsibility, decision-making authority, and specialised expertise required. This approach ensures that compensation is equitable, transparent, and consistent with both organisational objectives and employees' professional value.

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6.3.3 Social protection

ESRS S1-11

Rompetrol provides comprehensive social protection for all employees, safeguarding against potential income loss resulting from major life events, including sickness, unemployment, work-related injuries, disability, parental leave, and retirement. The legislation in force that regulates the family related leaves are:

- Government Emergency Ordinance 111/2010 on maternity leave and allowance for childcare
- Law 76/2002 regarding the unemployment insurance system
- Government Emergency Ordinance no. 158/2005 on holidays and social health insurance allowances
- Law 360/2023 regarding the public pension system

The above-mentioned coverage is ensured through national programs mandated by the state, complemented by additional support from Rompetrol companies via private health and life insurance policies. In line with Collective Labour Agreements (CLAs), Rompetrol also offers targeted financial support, such as a maternity bonus that bridges the gap between state-provided benefits and employees' regular monthly salary, as well as retirement bonuses

Also, Rompetrol offers social protection benefits for its employees safeguarding against income loss during events such as sickness, unemployment, employment injuries and acquired disabilities, parental leave, retirement or any other similar situations. The company offers the following social benefits for its employees:

- Health, life, sickness and disability insurance
- Medical subscriptions
- Humanitarian aid - for significant damage following calamities
- Assistance and allowances during and after pregnancy
- Allowances/ vouchers for rest and relaxation
- Benefits related to major life events (marriage, birth, illness, death)

Together, these measures ensure employees are financially protected and supported throughout various life events.

6.3.4 Persons with disabilities

ESRS S1-12

Rompetrol supports the inclusion of persons with disabilities and applies the principle of equal opportunity in employment. At the same time, most of the positions within the Group are subject to specific occupational health and safety requirements that are **objectively justified by the nature of the work** and **mandated under applicable legislation**. Compliance with these requirements is verified through medical assessments performed at the time of hiring and subsequently at regular intervals by an authorized occupational medicine service. This process ensures the protection of employee health and safety, the safe execution of operational activities, and compliance with legal obligations, without constituting a limitation on the Group's commitment to non-discrimination.

Entity		No. of employees with disabilities			% Employees with disabilities out of Total		
		Female	Male	Total	Female	Male	Total
Rompetrol Rafinare and its affiliates	2024	2	4	**6**	0.4%	0.3%	**0.3%**
	2025	4	3	**7**	0.2%	0.2%	**0.4%**

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6.3.5 Remuneration metrics (pay gap and total remuneration)

ESRS S1-16

Rompetrol is committed to the principle of equal and transparent remuneration, recognising its critical role in attracting, retaining, and motivating qualified talent. Ensuring fair pay for women and men is a key priority, with compensation determined by merit, skills, and job value. By implementing transparent and equitable pay practices, in line with European legislation, Rompetrol actively works to eliminate gender-based wage disparities and foster an inclusive workplace.

Operating in an industry traditionally dominated by men, Rompetrol has taken deliberate steps to reduce gender inequality across all levels of the organisation. These efforts are reflected in a steady increase in the proportion of female employees, demonstrating progress toward a more balanced and equitable workforce. In 2025, the company reinforced its commitment to fair and equitable compensation, focusing on addressing the gender pay gap as part of its broader sustainability and social responsibility initiatives.

For the gender pay gap according to ESRS S1.97 (a), we applied the following formula: the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees. The gender pay gap, defined as the difference between the average pay levels of female and male employees, expressed as a percentage of the average pay level of male employees. For the base salary, we applied the following formula to calculate the gender pay gap: (gross hourly pay level of male employees - gross hourly pay level of female employees) / (gross hourly pay level of male employees x 100).

	***Pay Gap male vs female % (base salary) -entity specific disclosure**	**Pay Gap male vs female % (total remuneration)**
Rompetrol Rafinare and its affiliates	-5.26	+2.92

In our organization, as in refining and energy industry broadly, a significantly higher proportion of male employees occupy operational roles involving shift work schedules, which typically include additional compensation components. Consequently, incorporating these elements into the total remuneration reflects primarily the distribution of work schedules and operational roles rather than actual differences in salary levels.

While the base-salary pay gap is -5.26% — indicating that female employees receive, on average, a higher base salary than male employees — the total remuneration gap shifts to +2.92% in favor of male employees. This outcome is primarily attributable to shift allowances and other operational-role remuneration components predominantly associated with male-occupied positions.

Rompetrol Rafinare & affiliates		
Unadjusted pay gap according to the standard	**2024**	**2025**
Gender Pay gap (%)	+7.92	+2.92

Rompetrol Rafinare & affiliates - Entity specific disclosure		
Base Salary- method	2024	2025
Gender Pay gap (%)	-5.34	-5.26

The 2024 calculation for gender pay gap was based solely on gross salaries and did not include all categories of compensation (such as bonuses, benefits in cash and kind, and long-term incentives) as required by ESRS.

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Breakdown of the pay gap between women and men, by employee category for 2025

Management level	*Pay Gap male vs female % (base salary)- entity specific disclosure	Pay Gap male vs female % (total remuneration)
Top Management	21.21	21.64
Middle Management	2.05	-3.17
Staff	-4.74	4.15

Breakdown of the pay gap between women and men, by employee category for 2024

Management level	*Pay Gap male vs female % (base salary) - entity specific disclosure	Pay Gap male vs female % (total remuneration)
Top Management	34.46	47.17
Middle Management	-1.90	13.40
Staff	-4.36	7.93

***Negative values indicate higher gross hourly pay level for female in comparison to male**. In the oil and gas sector, this result may be influenced by the distribution of employees across job families and roles. Female employees are often represented in higher-skilled technical, specialist, or professional positions, while a significant proportion of male employees occupy operational, field-based, or entry-level roles with different pay structures.

Access to night shifts and other work arrangements that generate additional compensation beyond the gross base salary is offered to all employees on an equal and non-discriminatory basis. However, in practice, such roles are more frequently undertaken by male employees due to the operational nature of these positions. For this reason, we consider that the most relevant indicator for assessing gender pay equity is the calculation based on gross base salary, as it reflects the employer's compensation structure for comparable roles. At the same time, in order to ensure transparency, comparability and alignment with ESRS requirements, the company will continue to disclose both methodologies going forward: the gender pay gap calculated based on gross base salary, as well as the calculation based on total remuneration including additional compensations, thereby providing stakeholders with a clear and comprehensive view of the company's remuneration practices.

The ratio of the total annual compensation for the highest paid employee to the total median annual compensation for all employees (excluding the highest paid employee). We applied the following formula for the total annual remuneration ratio = (annual remuneration of the highest paid employee)/(median value of annual remuneration (excluding the highest income))

Ratio	2024	2025
Rompetrol Rafinare and its affiliates	8.24	**4.69**

Rompetrol applies the principles of equal remuneration, as an important factor in retaining qualified employees. One of our priorities, ensuring equal remuneration for women and men, involves prioritizing fair pay practices, aiming to eliminate gender-based wage gaps and fostering a workplace where compensation is based on merit and job value rather than gender. The calculation was made considering all salary incomes made in the year and includes all employees.

6.4 Protection of human rights

6.4.1 Incidents, complaints and severe human rights impacts

ESRS S1-17

All internal procedures and policies are aligned with local and European legislation in force. No incidents of discrimination, including harassment, occurred in the reporting period.

Between January and December 2025, a total of five complaints/reports was submitted for Rompetrol Rafinare and ten complaints/reports for its affiliates (for Rompetrol Downstream) through the reporting channels managed by the Group Compliance Department. In 2024, between January and December, a total of two complaints/reports was submitted for Rompetrol Rafinare and four complaints/reports for

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its affiliates (for Rompetrol Downstream) through the reporting channels managed by the Internal Control and Forensics Department. The status of the five complaints received for Rompetrol Rafinare is the following: four complaints were not confirmed and were closed, and the other complaint is in progress. In respect with Rompetrol Downstream, the status of the ten complaints is the following: four of them were not confirmed and were closed, one of them was partially confirmed (closed), four of them were confirmed and were closed and one is in progress.

In relation to identified cases of severe human rights incidents (e.g., forced labour, human trafficking or child labour) there were no severe human rights incidents connected to the undertaking's workforce in the reporting period, including an indication which of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. No such incidents occurred in either 2025 or 2024.

6.5 Employee Well-being and Development Metrics

6.5.1 Health and safety

ESRS S1-14

Ensuring health and safety measures at work is essential in any activity, even more so in a company active in the oil and gas industry. The essential role that the company has in the national economy, involves ensuring a high level of quality and safety, so that the incidents that may occur in the activity do not become problems of great importance.

Employees play a crucial role in this process, and safe working conditions are particularly important to maintain the high standards of quality and safety of the products offered. The daily activities that our employees carry out involve the use of hazardous substances that can pose a risk to their health and safety and that of the community if they are not handled and used correctly.

By implementing health and safety measures at the workplace, the company ensures that employees are protected against injuries, work accidents and occupational diseases. These measures include the provision of personal protective equipment, regular training on safety procedures and regular medical check-ups. Guaranteeing employees' access to these measures contributes to the prevention of work accidents and the reduction of risks of exposure to harmful substances.

Below we disclose required information, where applicable broken down between employees and non-employees in the undertaking's own workforce:

a) the percentage of people in its own workforce who are covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines;
b) the number of fatalities as a result of work-related injuries and work-related ill. This information supports the information needs of benchmark administrators to disclose ESG factors subject to health;
c) the number and rate of recordable work-related accidents;
d) with regard to the undertaking's employees, the number of cases of recordable work- related ill health, subject to legal restrictions on the collection of data; and
e) with regard to the undertaking's employees, the number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health.
f) LTI and LTIR

LTI - Refers to any work-related injury or illness that results in an employee being unable to return to work for at least one full workday after the incident. It is a critical measure of workplace safety performance.

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LTIR is a metric used to standardize and compare lost-time injuries across different organizations or time periods. The Lost Time Injury Rate (LTIR) is calculated by multiplying the number of Lost Time Injuries (LTI) by 1,000,000, then dividing the result by the total number of work hours during the reporting period. The multiplier (usually 1,000,000) allows for comparison regardless of company size or workforce hours.

The information for (b) we reported for other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites.

We included the following additional information on the health and safety coverage: the percentage of its own workers covered by a health and safety management system which is based on legal requirements and/or recognised standards or guidelines and which has been internally audited and/or audited or certified by an external party.

At KMGI level, all the workforce is covered by the implemented safety management system.

Entity		Worked hours	Fatalities	LTI	LTIR	TRI	TRIR	Occupational illness	No. of lost workdays
Year 2025	RRC	1,974,978	0	0	0.00	1	0.51	0	5
	DWS	752,612	0	0	0.00	0	0.00	0	0
	RQC	324,948	0	0	0.00	0	0.00	0	0
	GSS	1,360,000	0	0	0.00	0	0.00	0	0
	RPL	3,908	0	0	0.00	0	0.00	0	0
	RML	4,874	0	0	0.00	0	0.00	0	0
	GAS	162,639	0	0	0.00	0	0.00	0	0
	Total	4,583,959	0	0	0.00	1	0.22	0	5
Year 2024	RRC	2,036,027	0	4	1.96	5	2.46	0	84
	DWS	807,343	0	0	0.00	0	0.00	0	0
	RQC	331,464	0	0	0.00	0	0.00	0	0
	GSS	1,357,030	0	0	0.00	0	0.00	0	0
	RPL	4,268	0	0	0.00	0	0.00	0	0
	RML	4,898	0	0	0.00	0	0.00	0	0
	GAS	169,081	0	0	0.00	0	0.00	0	0
	Total	4,710,111	0	4	0.85	5	1.06	0	84

RRC - Rompetrol Refining; DWS - Rompetrol Downstream; RQC - Rompetrol Quality Control; GSS - Global Security System; RPL - Rompetrol Logistic; RML - Rom Oil Romania; GAS - Rompetrol GAS

*LTI – Lost Time Injury; LTIR – Lost Time Injury Rate; TRI - Total Recordable Injuries; TRIR – Total Recordable Injuries Rate

Rompetrol Refinery May 15th – RWDC (restricted work day case classification according to the KMG Rompetrol QHSE Management System) - One operator suffered a cut plague on the middle finger of the left hand trying to remove the plastic collars that secured a bag (solid peroxide) using a cutter. He was sent to Constanta Hospital to be checked. Further medical investigation from Constanta Hospital, the employee didn't need surgical intervention (only stitches) nor hospitalization.

(The work-related injury rate is calculated as the respective number of cases divided by the total number of hours worked by persons in the own labor force and multiplied by 1,000,000.)

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Process Safety

Rompetrol considers process safety a critical component of its environmental, social and governance (ESG) framework. Process safety focuses on the prevention of major accident hazards, including fires, explosions and unintentional releases of hazardous substances, which could cause harm to people, the environment and assets.

The Company operates a process safety management system designed to identify, assess and control major operational risks throughout the lifecycle of its activities. This system is aligned with internationally recognised practices, including API RP 754 and risk-based methodologies such as HAZOP and LOPA.

During 2025, one Tier 1 process safety event (defined as a major process safety event involving loss of containment, fire, explosion or toxic release) was recorded. The event resulted in no fatalities and no injuries and caused only minor material damage.

On 14 February 2025, an ignition occurred at the Mild Hydrocracker unit of the Petromidia Refinery**,** involving a heat exchanger. The investigation concluded that the root cause was a design-related weakness**.**

Following the incident, a detailed risk assessment was conducted and the following corrective and preventive actions were implemented:

- assessment of all process units to identify any similar design-related vulnerabilities.
- installation of steam rings on the affected heat exchangers, with an evaluation ongoing to determine the need for similar installations on the remaining heat exchangers;
- comprehensive review of HAZOP study recommendations across all units, including the establishment of clear prioritisation and implementation timelines.
- These measures are intended to prevent recurrence and to further strengthen process safety and operational risk management.

Process Safety Management Activities:

1. Process Safety Audits and Inspections

The Process Safety Department conducts monthly compliance audits of the process safety management system in line with the approved audit programme. Any non-compliances are documented, and corrective actions are tracked to closure.

In addition, daily site inspections focus on the condition and integrity of critical process equipment. All observations are recorded, and follow-up actions are tracked until completion, ensuring continuous monitoring of operational safety.

2. Emergency Operating Procedures (EOP) Drills

Rompetrol Refinery has established and approved procedures for conducting Emergency Operating Procedures (EOP) drills. Drills are executed according to the approved schedule, with **formal reports** generated and maintained at each control console.

The Process Safety Department oversees planning and monitoring of EOP drills. Drills are full-scale, physical exercises, including walkthroughs and timing of key field activities (e.g., ladder climbs, valve operations), to ensure preparedness for emergency situations.

3. Major Accident Prevention

In 2025, the Process Safety Department developed and implemented the procedure “Basic Principles for Preventing Major Accidents in Industrial Facilities”. This initiative aims to establish the fundamental principles and minimum requirements necessary to ensure process safety across refinery installations, covering both routine operations and maintenance activities.

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The procedure is a key element of our commitment to sustainable and responsible operations, focusing on the prevention of major accidents, including chemical leaks, explosions, and uncontrolled reactions. By systematically addressing potential hazards, it not only protects our employees and facilities but also minimizes environmental risks, contributing to the safety and sustainability of industrial operations.

Through this approach, the refinery reinforces its dedication to risk management, environmental protection, and the continuous improvement of safety practices, aligning operational excellence with broader sustainability goals.

4. Process Hazard Analysis (PHA)

HAZOP study recommendations are prioritised, assigned to responsible personnel, and tracked to completion by the Process Safety Department. This ensures that identified process hazards are addressed systematically and corrective actions are fully implemented.

A Safety Measures Package Program was initiated at Petromidia Refinery with the objective of increasing the overall safety level of the refinery units, with a particular focus on the hydrotreater installations.

The program comprises safety packages. Safety Package I focused on enhancing safety measures at the separation points between high- and low-pressure sections of the Petromidia Refinery hydrotreater units. All actions included in this package were derived from HAZOP study recommendations and have been fully implemented and completed.

Building on these improvements, Safety Package II addresses the upgrade of sampling points for all Petromidia Refinery hydrotreater units. Partial implementation, limited to tie-in activities, was carried out during general turnaround 2024, with full project completion planned for 2026.

Together, the measures implemented under Safety Packages I and II have significantly enhanced the safety level of the refinery's technological units, contributing to improved risk prevention, safer operations, and strengthened process safety performance.

In line with this continuous improvement approach, the five-year business plan for 2026–2030 includes dedicated capital expenditure for Safety Package III, Safety Package IV, as well as new HAZOP-related projects addressing recommendations identified in previous HAZOP studies. Overall, 7.5% of the total Capex budget for 2026–2030 is allocated to safety and security initiatives, underlining the Company's long-term commitment to operational safety, risk mitigation, and sustainable operations.

- **Actions related to Occupational safety**

Actions Taken or Planned

The organization continues to implement a wide range of HSE measures designed to strengthen risk prevention, operational discipline, and regulatory compliance across all refinery platforms. Actions such as training programs, safety audits, certification initiatives, and preventive controls are conducted on an ongoing basis, ensuring improvement and alignment with international best practices. These initiatives are applied consistently to all operational personnel as well as contractor teams, reflecting a unified safety approach across the entire site.

Planned actions follow the same strategic direction, focusing on maintaining high levels of workforce competence, enhancing hazard identification, and reinforcing emergency preparedness. Routine and targeted safety audits, refresh trainings, and updates of operational procedures are scheduled regularly to address emerging risks and support safe work execution in all areas. Preventive measures—including inspections, operational verifications, and certification renewals—remain an integral part of the organization's long-term safety management framework.

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Scope:

These actions cover all workers performing activities on the refinery platforms, including company employees, contractors, and subcontractors. They apply to all operational zones—production units, maintenance areas, logistics and transport routes, administrative buildings, and shared service locations—ensuring comprehensive HSE coverage across all operations conducted on-site.

Resources Allocated

To support the continuous enhancement of health, safety, and environmental performance, the organization allocated a balanced mix of financial, human, and operational resources. Financial investments remained moderate for smaller initiatives with significant impact—such as awareness tools and training materials—while strategic high-value acquisitions, including new fire trucks, further strengthened the company's emergency response capabilities.

The organizational structure of the QHSE function was expanded to ensure more robust oversight and field presence. New positions were created for Safety Inspectors, enhancing monitoring capacity across operations, along with an additional role for an Occupational Doctor to reinforce health surveillance and preventive care.

Operational investments also contributed to stronger risk management, notably through the deployment of Broadcast/Man Down communication stations, which provide real-time alerting and improved worker protection in high-risk areas. Collectively, these resources form a solid foundation for sustaining long-term safety performance improvements and operational resilience.

Expected Outcomes

As a result of the measures implemented—including the safety culture audit, the introduction of alcohol-testing detectors, and various motivation and reward initiatives—the organization expects a measurable improvement in overall workplace safety performance. These actions are anticipated to lead to a reduction in workplace incidents and unsafe behaviors, driven by increased employee awareness and accountability. Furthermore, the initiatives aim to strengthen the company's safety culture, fostering proactive reporting, responsible decision-making, and greater engagement at all organizational levels. Compliance with internal procedures and regulatory requirements is also expected to improve, supported by more consistent monitoring and enhanced prevention mechanisms.

Progress Tracking

The group established a composite index which measures personnel efforts to improve Health and Safety culture in the entity, targeting reduction of incidents at workplace and an increase in safety culture. These take into account the followings:

Reduction of number of occupational injuries, LTIR - Lost time injury previous year versus current year;

Percentage of closed Non-conformities out of total number issued - to ensure safe systems of work and a safe work environment, trough inspections or audits, or just simple random observation of unsafe conditions or actions (called non-conformities) are observed, communicated, investigated, and further mitigated.

QHSE Plan Execution (internal document) - the KPI follows the reinforcement of our QHSE policy and Life Saving Rules. Through interactive sessions and audits, we empower our team to prioritize safety in all activities.

Major milestones are covered by:

Promote and refresh awareness QHSE Policy via Safety Stand Downs and/or meetings (for all shifts)

On monthly basis: Promote Life Saving Rules during Monthly HSE Meetings

Monthly HSE Meeting at Unit

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Submit one Hazard Observation Card

Carry out Life Saving Rule Compliance Inspection

Permit to Work (PTW) monitoring audit using PTW audit form

Retraining of entire operational personnel present Petromidia and Vega Platform in regards with Company operational procedures and QHSE procedures is complete, and the extension of *Supervision* personnel on Platforms is initiated, in progress.

- **"SAFETY BEGINS WITH YOU!"** campaign was launched on both platforms, designed not only to improve safety culture, but also quality of working conditions and the detailed analysis of these aspects. This campaign refreshed the awareness about the risks and hazards associated with your job and influence each colleague to be responsible for taking necessary precautions to prevent accidents and injuries.
- Reinforce culture of safety with **LIFE SAVING RULES**. Each employee received these rules, welcomed by our top management on the main entering gates along with small motivational gifts,
- **A PERMANENT FEEDBACK FORM**, which was accessible for employees, mobile phones via a QR code and in printed format, in the control panels of units.

Permit to Work (PTW) Implementation and Monitoring

In order to align with international refinery best practices and enhance safety awareness among operational teams, an updated Permit to Work (PTW) system was developed and implemented at Rompetrol Rafinare Company (RRC).

The procedures governing the new PTW system were issued in March 2025 and subsequently revised in December 2025. During 2025, all RRC employees, as well as contractors and subcontractors, received comprehensive training on the new requirements.

The system was initially implemented at the Petrochemical Plant in April 2025 and was subsequently rolled out in a phased manner across all RRC-operated areas at the Petromidia platform.

The updated PTW framework introduces an enhanced Job Safety Analysis (JSA) methodology, incorporating detailed operational hazard identification, and formally integrates the Toolbox Talk (TBT) concept. TBT sessions are conducted by execution teams to increase awareness of hazards and control measures at each stage of an activity and to identify and address last-minute risks through Last-Minute Risk Assessment (LMRA).

Monitoring and compliance activities related to the PTW system, including PTW audits, ICC and EPI audits, as well as the analysis of related findings and trends, are incorporated into the QHSE Execution Plan. This document is formally endorsed by the General Manager of RRC and the QHSE Manager.

For shutdowns and turnarounds, a dedicated procedure has been developed to adapt the standard PTW process to the specific operational conditions of these periods, streamlining and simplifying the approval and control workflow while maintaining safety standards.

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Hazard Observation Cards Platform

The implementation of a dedicated Hazard Observation Cards (HOC) platform at refinery level significantly enhances the visibility of unsafe conditions and at-risk behaviors, enabling timely corrective actions. The platform supports a proactive safety culture by encouraging consistent and accessible hazard reporting by all personnel. Centralized digital data facilitates trend analysis, informed decision-making, and targeted preventive actions, contributing to a reduction in incidents. In addition, the platform improves communication between operational teams and management, strengthening accountability and continuous improvement in HSE performance.

The platform was officially launched on the World Day for Safety and Health at Work, reinforcing the message that safety is a shared responsibility. Regardless of role or location, every employee plays a vital part in maintaining and strengthening a safe working environment. The platform empowers all KMG International employees to identify and report potential workplace hazards and, where relevant, to provide positive feedback on health and safety practices.

To ensure accessibility, the Hazard Observation Card is available in two formats:

- **Digital format** – via the Timea chatbot, accessible through Microsoft Teams, Facebook Messenger, WhatsApp, and Webchat
- **Printed format** – available at operational locations in dedicated "HOC" collection boxes located in control rooms, notice boards, meeting rooms, and other common areas

All situations reported through the Hazard Observation Card system are systematically reviewed by the QHSE team and discussed with the relevant department managers to ensure appropriate corrective actions and continuous improvement.

Safety Recognition Program

The "Proactive Safety Action Awards" is a comprehensive safety recognition program designed to strengthen the safety culture at the Petromidia and Vega refineries. The program was jointly developed by the QHSE and HR departments and is structured around three core award categories:

- **Best Hazard Observation Card (HOC)** – Encourages employees to report unsafe acts, unsafe conditions, and positive safety behaviors.
- **Best Compliance during Safety Inspections and/or Audits** – Recognizes employees and contractors who demonstrate strict adherence to safety standards during inspections and audits.
- **Safety Champion Award** – Applies exclusively to employees carrying out their activities at the Petromidia and Vega refineries and recognizes outstanding commitment to safety performance

The program aims to: increase visibility of and responsiveness to HSE risks, encourage proactive safety behavior at all organizational levels and reinforce a culture of responsibility, accountability, and recognition.

The evaluation criteria, selection process, and incentive scheme are defined in a comprehensive regulation approved for the 2025–2026 period. The program is open to all employees working on the Petromidia and Vega platforms, excluding HSE personnel, in order to ensure objectivity. Through this initiative, leadership engagement across refinery teams is actively encouraged.

"1.Life / 1.Viata" Communication Channel

The "1.Life / 1.Viata" communication channel is a key element of the initiative to strengthen workplace safety culture. Through this channel, important information supporting the safe execution of activities is shared across the platforms.

Relevant safety messages are disseminated through Safety Bulletins and Safety Alerts, including incidents that have occurred at other KMG International operations and the associated lessons learned.

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These materials are used as “safety moments” at the start of operational meetings, as well as during monthly safety meetings with top management and operational staff.

Email-based safety communication, particularly when managed through a dedicated channel, is essential to ensure that critical information is shared quickly, consistently, and in a traceable manner. This structured approach prevents important messages from being overlooked, supports clear accountability, enables trend monitoring, and facilitates timely follow-up on identified hazards. It also strengthens the overall safety culture by providing employees with a reliable mechanism for reporting concerns and receiving guidance.

To ensure effective information management, responsibility for sending messages to the entire platforms or to specific entities through this channel is assigned exclusively to two designated QHSE representatives.

Occupational Health Doctor

Since 2025, we include as part of QHSE team an Occupational Health Doctor, for Navodari platform having the role of integrating the occupational health process into the QHSE department.

Major activities considered which will add value into the company are - coordinating the occupational health process, developing management systems for occupational health and health programs for employees, monitoring employees' exposure to occupational hazards, coordinating medical evacuation with occupational health services provider, review and analyze all occupational and non-occupational health cases and develop improvement plan, inspect workplace health and hygiene conditions and propose improvement plan and follow up with respective parties. Also, as part of activities will be :

- Maintain clinic governance in refinery medical facilities (including medical records, clinical practices pharmacy stock control, equipment management, infection control etc.);
- Review and maintain competency of the local occupational health service provider doctors;
- Provide advice and supervision to First Aiders during medical and operational emergencies;
- Ensure occupational health requirements are provided and maintained in regards to Company standards and local regulations;
- Actively participate in developing and implementing Health promotion programs at refineries in cooperation with QHSE Department and in collaboration with Facilities Management;
- Inspect catering facilities/process to identify health risks and provide improvement plan;
- Support QHSE Department in prevention and management of infectious diseases outbreaks;
- Conduct alcohol and drug tests as requested (all access points of employees and contractors – Vega and Petromidia Refinery);

Rompetrol’s rescuers

In an industry where risks are part of daily life, the operational rescuers from Rompetrol refineries respond swiftly and efficiently to emergency situations that might appear on the

platforms. These professionals - who volunteer to become rescuers - are in saving lives and protecting the environment from the hazards of the oil industry. Thoroughly trained and fully dedicated, they play vital roles, ranging from providing first aid to performing technical operations that eliminate potential hazards, demonstrating both courage and responsibility towards the community.

Based on these facts, we've compiled some impressive statistics about Rompetrol's rescuers:

- 174 operational rescuers are registered on Petromidia Platform, across all entities Rompetrol Rafinare, Midia Marine Terminal, Rominserv, Rompetrol Quality Control, Rompetrol Energy and Global Security System
- 52 Rompetrol Rafinare employees are registered as members of the Romanian Association of Mining and Surface Rescuers (ASMS)

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Safety culture audit

The purpose of conducting the survey is to access and map the strengths and the challenges that are present in the Rompetrol safety culture.

By initiating this survey Rompetrol have set a course to establish an evidence-based foundation for cultural transformation to better tackle risk and improve long-term safety for its employees, stakeholders and environment.

The external auditor conducted the Safety Culture Survey, considered as methodology:

- In-depth structured interviews with top managers and HSE department members
- Analysing of the observations, safety artefacts, safety leadership discourse, safety documents.
- Structured Questionnaire applied on a Statistical Representative Sample.
- Initial simple random selection based on random numbers was replaced with a quota sampling schema based on the respondent location under conditions of anonymity.
- A secondary variable (seniority in the company) was used to check the data and perform necessary corrections.

Culture refers to the pattern and strategies of shared beliefs of a group which are patterned and integrated into actions and behaviors and evidenced in artefacts, traditions, symbols, social patters, rules, habits, rituals, language and political space.

A cultural transformation roadmap for the next 3 years was issued.

There have been initiated and organized already during 2025 the safety strategic & team alignment workshops with the executive team as HSE Safety Leadership, the ones addressed to the HSE team.

Fixed automated alcohol-testing devices - During 2025 it was implemented fixed, automated alcohol-testing devices at the entry gates of a refinery

Ex proof mobile phones/cameras:

A clear rule “Only Ex devices allowed inside the refinery” - reinforces a mindset of hazard awareness and zero tolerance for unsafe behaviors, contributing to a strong safety culture.

The purpose of the project was the acquisition of 30 ATEX mobile phones to be used in Ex environments, including for documentation through photography.

Using only Ex devices ensures compliance with standards such as ATEX, IECEx, and local regulatory requirements, protecting the company during inspections or audits.at the same time, it reduces the likelihood of fires or explosions and supporting the facility’s Process Safety Management framework.

Broadcast/Man Down stations:

The purpose of the project consisted of acquiring licenses, software, and activating the GPS Tracking and Man Down functions on all TETRA stations available on the PEM platform, 170 units.

- GPS tracking allows emergency teams to see who is inside the area, track movements in real time, guide responders to the exact location; this improves coordination during fires, gas releases, or medical emergencies.

In this way, in a refinery, you may instantly see the exact location of the worker in trouble reach them much faster and reduce potential severity of injuries by enabling immediate intervention

Smoke detectors

The project consisted of installing smoke sensors in electrical station 306, installing a new ESSER control panel, and integrating them into the GSS control room.

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The major advantages are:

- Early Detection of Electrical Fires
- Prevents Large-Scale Equipment Damage
- Improves Personnel Safety
- Supports Business Continuity & Minimizes Downtime
- Enhances Compliance with Fire Safety Standards
- Provides Faster Emergency Response
- Protects Critical Infrastructure
- Enables Remote Monitoring

Fire Trucks

The purpose of the project was to purchase 2 fire engines and 2 foam transport vehicles. These will be used together to complement the semi-fixed fire extinguishing system for tanks.

As main benefits, we can mention the following

- Safety and Reliability - modern braking systems (ABS, ESP), traction control, safer cabins for the crew (airbags, impact protection), much lower risk of malfunctions during intervention
- Economic and Ecological Efficiency - reduced fuel consumption, lower maintenance and repair costs
- The project is completed.

Safety Polygon

Based on past experiences, the need to organize a centralized training was identified for Health, Safety and Environment aspects (issues) and the action of building/installing training places was started for development of the necessary skills to safely perform some types of dangerous works involving the risk of serious and/or fatal injuries.

Currently, the Group is implementing the “TRAINING MODULE-1”, a vessel used in confined space works and confined space rescue trainings.

In the second stage (2026)it a roof from the modular metal structure (to allow the dismantling of the structure in the future if necessary) will be built in order to allow to go further with the implementation of new training courses on Working at Height and Rescuing victims from Heights, Working in Confined Spaces and Rescuing victims from Confined Spaces, and so on.

Additional activities:

First aid training – we have been providing employees for several years in a row first aid trainings.

Safety truck – Refinery platform in Navodari is the host for a demo truck organized with complex and high-performance equipment for working in safe conditions - portable gas detection, respiratory protection equipment, self-rescue caps, drink alcohol, drug test.

Rompetrol Downstream has implemented a comprehensive set of measures to strengthen occupational health and safety performance and ensure compliance with applicable legal and regulatory requirements. These include the introduction of a fire safety assessment program across retail stations to evaluate compliance with fire protection regulations, identify corrective actions, and determine the need for re-authorization under applicable PSI requirements. QHSE Global Alerts are issued following incident investigations and are systematically disseminated across retail stations and depots as structured lessons learned to prevent recurrence and reinforce safety culture. In parallel, Health and Safety Information Notices (INFO SU) are regularly distributed to raise awareness of periodic operational activities and regulatory obligations. Occupational health and safety training is provided to contractors and subcontractors to ensure alignment with company standards and legal requirements, while specific personal protective equipment requirements have been strengthened and integrated into

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technical specifications and tender documentation, supporting safer operations and responsible procurement practices.

Rompetrol Gas has implemented comprehensive emergency and occupational health and safety systems to ensure the protection of employees, assets, and operations. Fire protection infrastructure includes safety lighting, technological safety installations, fire and gas detection systems, alarm and warning systems, special water-based extinguishing systems, lightning protection, fire extinguishers, outdoor hydrants, dedicated firefighting water reserves and pumps, stocks of extinguishing and neutralizing agents, and appropriate protective equipment for emergency response personnel, based on identified risks. Emergency preparedness is regularly tested through internal emergency plan exercises conducted quarterly, external emergency plan drills organized by the Emergency Situations Inspectorate every three years, and monthly drills in line with internal schedules. In parallel, occupational health and safety management is supported through the implementation of Hazard Observation Cards, integrated weekly QHSE and operational meetings, quarterly meetings of the Occupational Health and Safety Committee (CSSM), comprehensive OHS training for employees at onboarding, at the workplace, and periodically thereafter, the issuance and dissemination of QHSE Alerts where applicable, and the organization of first aid training courses.

6.5.2 Work-life balance metrics

ESRS S1-15

The percentage of our employees eligible for family-related leave is 100%. All our employees are entitled upon request to family-related leaves, such as: maternity leave, parental leave, and careers' leave, in accordance with the legislation in force, the Internal Regulations and Collective Labor Agreements. Also, our employees benefit of days off for personal events, such as child birth, marriage, death of a close relative, change of permanent address.

The table shows that all employees, regardless of gender, are entitled to family-related leave, reflecting the company's commitment to equal access to work–life balance measures. Uptake of family-related and care leave is observed among both female and male employees, indicating that such benefits are actively used across the workforce.

The proportion of employees taking maternity or parental is consistent with the demographic structure of the workforce and the operational nature of the oil and gas sector.

Rompetrol Rafinare and its affiliates		Female	Male	Total
Total Headcount	**2024**	587	1,301	**1,888**
	2025	564	1,294	**1,858**
Employees entitled to family related leave	**2024**	587	1,301	**1,888**
	2025	564	1,294	**1,858**
Employees who took maternity/paternity or parental leave	**2024**	43	8	**51**
	2025	22	3	**25**
Employees who took family related and care leave	**2024**	112	202	**314**
	2025	113	177	**290**
Percentage of employees entitled to family related leave	**2024**	100%	100%	**100%**
	2025	100%	100%	**100%**
% Employees who took maternity/paternity or parental leave	**2024**	7%	1%	**3%**
	2025	4%	0%	**1%**
% Employees who took family related and care leave	**2024**	19%	16%	**17%**
	2025	20%	14%	**16%**

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6.5.3 Training and skills development for own workforce

ESRS S1-13

At Rompetrol Rafinare and its affiliates, part of the KMG International (KMGI) Group, learning and development are considered key enablers for long-term value creation, business resilience, and responsible workforce management. In 2025, the Group continued to strengthen its approach to skills development, professional standards, onboarding, and employee engagement through a comprehensive and structured learning ecosystem, aligned with international best practices and sustainability expectations.

Professional Standards and International Certification

In 2025, Rompetrol Rafinare and all affiliated entities achieved ACCA Approved Employer – Improved Level certification, granted by the Association of Chartered Certified Accountants (ACCA). This internationally recognized certification confirms the Group's compliance with global standards related to employee learning, ethics, and professional development, and applies across all relevant Group entities.

Being certified as an ACCA Approved Employer represents a formal partnership with ACCA and demonstrates the Group's commitment to supporting ACCA members and students through structured learning environments, adherence to ethical standards, and continuous professional development (CPD). The certification covers the Professional Development stream, enabling qualified ACCA members within the organization to meet their annual CPD requirements.

Employees in Accounting and Finance functions benefit from access to international learning standards, and will have tailored development plan and a structured framework that supports professional growth, career progression, and long-term employability. As the certification is awarded exclusively to organizations, it further reinforces Rompetrol Rafinare's role as a responsible employer, focused on developing internal capabilities and retaining highly qualified professionals.

Digital Learning and Equal Access to Development

In parallel, Rompetrol Group with Rompetrol Rafinare and its affiliated companies continued to expand access to learning through e-learning platform based on paid subscription. The platform provides a portfolio of technical and soft skills courses, supporting both personal and professional development and ensuring access to learning opportunities across the Group.

Employees are encouraged to take ownership of their learning journey by selecting courses aligned with their individual development needs.

In 2025, to promote learning and engagement of the courses available on the platform we actively communicated through the Group's internal social media channel Yammer) periodical engagement posts. Employee participation based on paid subscription was further encouraged through an annual recognition mechanism, whereby employees with the highest course completion rates are acknowledged annually for their learning achievements.

Investment in Learning Infrastructure and Sector-Specific Capabilities

Recognizing the strategic importance of skills development in a highly specialized industry, in 2025, at the Group level was initiated the acquisition of a Group-wide Learning Management System (LMS). The procurement process was completed during the year, with the tender finalized and the contract in its final stages. The LMS is scheduled for implementation, configuration, and integration with existing HR systems in 2026.

Once implemented, the LMS will enable the development of tailored learning pathways for all categories of employees, supporting onboarding, continuous development, and career progression. The energy, oil, and gas sector requires specialized knowledge, terminology, and regulatory understanding across functions such as engineering, operations, finance, and support roles. The LMS will support faster and

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more effective integration of new hires—particularly during their first year of employment—and contribute to improved retention and long-term workforce stability.

In parallel with the LMS acquisition, the Group is developing fully digital, internally tailored training programs. These include a Risk Management and ESG Risk course, designed in full alignment with European Union regulatory requirements and international standards, which will be launched for all Group employees in January 2026.

A comprehensive digital induction program for new hires was also initiated in 2025, covering 17 key business areas and providing a structured overview of the entire Rompetrol value chain. This program supports consistent onboarding across the Group and enhances employees' understanding of business interdependencies and operational context from the beginning of their employment.

All digital learning content is developed using a user-friendly instructional design, with embedded assessments to evaluate knowledge assimilation and learning effectiveness.

Employee Engagement and Continuous Learning Culture

Following the feedback of the employee survey conducted in 2025, was launched a Group-wide learning initiative entitled "Energize U", designed to democratize access to learning and strengthen employee engagement. The program is open to all employees across the Rompetrol Group, irrespective of role or entity.

"Energize U" consists of open learning sessions covering skills of the future, with an average duration of approximately four hours per course. Training topics are identified based on business needs and employee feedback, ensuring relevance and practical applicability. In 2025, 9 sessions were delivered, addressing topics such as the integration of AI tools in daily activities, data storytelling, change management, and emotional intelligence.

By the end of 2025, around 85 employees from across the entities in scope have enrolled in the program. Promotion was carried out through multiple internal channels, including email communications, Yammer, and internal newsletters. Participant feedback was highly positive, with 97% of participants indicating they would recommend the program to colleagues, reflecting a strong learning culture and high employee engagement.

At Group level, training and development are governed by a formal Training and Development Procedure, which defines learning as a continuous and structured process. Employees are supported in developing their competencies through internationally recognized professional certifications—including CIPD and ACCA, as well as technical training programs tailored to specific operational activities.

Employees training needs are assessed by direct managers in collaboration with employees and consolidated at Group level into an integrated training plan, supporting continuous skills enhancement and long-term human capital sustainability.

The Talent and Development function at KMG Rompetrol level has been delivering Cultural integration workshops for expatriate employees, over the past years. This ongoing approach is regularly reviewed and improved, aiming to better respond to the evolving needs of expatriate colleagues.

In addition to cultural integration sessions focused on local culture in Romania, business conduct, and organizational values, the function also develops well-structured guidance materials to support expatriates during their initial local and administrative orientation. These initiatives aim to foster a sense of belonging, enable effective collaboration, and reduce integration-related risks.

To reinforce internal knowledge transfer and operational capability, the Group continued to invest in a "Train the Trainers" program. The program focuses on strengthening internal trainers' communication, facilitation, and knowledge-sharing skills, with a strong emphasis on practical application in operational contexts. This initiative supports effective knowledge retention, scalability of learning initiatives, and consistent quality of internal training delivery across the organization.

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Mandatory Training

In 2025, the company continued and consolidated the initiatives started in 2024 regarding mandatory trainings and the development of a QHSE culture, transitioning from a predominantly compliance-oriented approach to a mature one focused on prevention, leadership, and accountability at all organizational levels.

As a result of the sustained efforts from the previous year, in 2025 the mandatory trainings were expanded and structured based on identified operational risks, ensuring that personnel involved in high-risk activities possessed the necessary competencies and authorizations in compliance with legal requirements and internal standards.

These trainings targeted both the reauthorization of personnel and the development of the competencies required for carrying out activities safely, contributing to the reduction of operational risks and increasing safety awareness among employees.

In line with the strategic direction established in the previous year regarding the transformation of the organization towards a QHSE culture, 2025 represented a stage of consolidation, with a focus on increasing employee participation in hazard observation and reporting programs; developing leadership competencies in health and safety and empowering personnel involved in critical activities through specific trainings (PTW, Rescue Operator, Safety Electrical).

Building on the initiatives launched and developed to date, we aim to expand the use of a Learning Management System (LMS); define tailored learning paths for critical roles; further consolidate the QHSE culture across the entire organization.

Training Rompetrol Rafinare and its affiliates	**2025**	**2024**	**2022**
Average number of training hours per employee	23.96	20.54	26.42
Average training hours for female employees	22.70	15.51	11.53
Average training hours for male employees	24.50	22.80	33.25

Training Rompetrol Rafinare and its affiliates	**2025**	**2024**
Average training hours for managers	44.86	25.91
Average training hours for execution level employees	22.30	20.10

Training Rompetrol Rafinare and its affiliates	**2025**	**2024**	**2022**
Total training hours for female employees	12,792.5	9,094.5	6,732
Total training hours for male employees	31,711.5	29,677.5	42,322
Total hours of training	**44,504**	**38,772**	**49,054**

Training Rompetrol Rafinare and its affiliates	**2025**	**2024**
Total training hours for managers employees	6,116	3,661
Total training hours for execution employees	38,389	35,111
Total hours of training	44,504	38,772

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Performance Evaluation and Objective Setting

As part of its approach to managing its own workforce, the Group operates a structured annual performance evaluation and objective-setting process applicable to all eligible employees. This framework supports performance management, professional development, and alignment between individual contributions and organizational objectives. The performance evaluation cycle is conducted on an bi-annual basis and is administered through a dedicated HRIS platform. The process is initiated in mid-January with formal communication to employees regarding the launch of the appraisal cycle. It includes a self-assessment phase, followed by an evaluation performed by the direct supervisor and a performance review discussion that facilitates feedback and clarity on performance outcomes. The evaluation process is completed by the end of February.

Objectives for the current year are defined and approved by the end of March. During this stage, company-level objectives are cascaded to individual roles and translated into measurable performance indicators, which are jointly agreed upon by employees and their direct supervisors.

- Performance against agreed objectives is monitored on an ongoing basis throughout the year. Where necessary, objectives may be reviewed and adjusted during the mid-year review period in August, subject to supervisory approval, to reflect changes in responsibilities or business priorities.
- The performance evaluation process applies to the entire eligible workforce. In 2025, performance assessments carried out for the 2024 reporting period covered 1,813 employees, comprising 1,240 men and 573 women. This represents 96.03% of eligible employees, with participation rates of 96.46% among women and 95.83% among men, indicating broad and equitable coverage of the performance management process. The number of employees who went through the Performance Evaluation process in 2024, for 2023, was 1,828 employees, respectively 1,245 men and 583 women, which means 96.8% of the total eligible employees, respectively 97.2% of women and 96.7% of men.

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7 WORKERS IN THE VALUE CHAIN

ESRS S2 Workers in the value chain

Within the context of ESRS S2, we are applying a phased-in approach to the introduction of information, in accordance with Annex C of ESRS 1, for the presentation of sustainability information relevant to ESRS S2 (Workers in the value chain). Through the Group's value chain assessment, Rompetrol has identified four categories of workers as particularly significant to its business operations, based on their level of exposure to operational activities, and interaction with company assets and products.

The first category comprises personnel operating within the retail network of Rompetrol Downstream, under the Company Owned Dealer Operated (CODO) model. While these individuals are formally employed by independent dealers, they perform day-to-day activities in Rompetrol-branded stations, under operational standards, procedures and safety requirements established by the Group. From an ESRS perspective, these workers may be considered part of the value chain workforce (S2), although operationally they function in a manner closely aligned with the Group's own workforce.

The second category includes contracted personnel performing maintenance and operational services within refinery operations (Petromidia and Vega), primarily through Rominserv, the Group's general contractor. These workers are directly involved in core industrial activities and operate on company premises, being exposed to similar occupational risks as Rompetrol employees.

The third category refers to drivers employed by transportation contractors, responsible for the distribution of petroleum products to depots, retail stations and end customers. Given their direct involvement in handling and transporting company products, these workers are also considered relevant from both operational and safety perspectives.

The fourth category includes firefighting personnel subcontracted through GSS, under dedicated contracts for fire prevention and emergency response services. These teams play a critical role in ensuring operational safety, and are continuously present on or near company premises.

For all these categories, although Rompetrol does not hold direct employment relationships, they are subject to the Group's health, safety, security and environmental (HSSE) requirements, including mandatory compliance with internal procedures, training standards and site-specific safety rules. Furthermore, contractual arrangements with suppliers and contractors include explicit obligations regarding occupational health and safety, aligned with applicable legislation and internal management systems.

As a matter of both regulatory alignment and internal best practice, Rompetrol monitors and reports safety performance indicators (including for these contractors), in line with internationally recognized industry frameworks such as IOGP and IPIECA guidance, ensuring a comprehensive and transparent view of safety performance across both own workforce and relevant value chain workers. This approach reflects the Group's commitment to extending its safety culture beyond direct employees, recognizing that workers performing activities on its premises or directly linked to its operations may be exposed to similar risks and therefore require equivalent levels of oversight, protection and reporting.

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Year	Entity – Contractor data	Worked hours	Fatalities	LTI	LTIR	TRI	TRIR
2025	RRC	387,740	0	0	0	0	0
	DWS	7,017,208	0	4	0,57	4	0,57
	RQC	2,892	0	0	0	0	0
	GSS	657,520	0	0	0	0	0
	RPL	n/a	0	0	0	0	0
	RML	n/a	0	0	0	0	0
	GAS	1,639	0	0	0	0	0
	Total	8,066,999	0	4	0,5	4	0,5
2024	RRC	477,059	0	0	0	0	0
	DWS	7,135,182	0	1	0,14	1	0,14
	RQC	6,230	0	0	0	0	0
	GSS	709,080	0	0	0	0	0
	RPL	n/a	0	0	0	0	0
	RML	n/a	0	0	0	0	0
	GAS	817	0	0	0	0	0
	Total	8,328,348	0	1	0,12	1	0,12

RRC - Rompetrol Refining; DWS - Rompetrol Downstream; RQC - Rompetrol Quality Control; GSS - Global Security System; RPL - Rompetrol Logistic; RML - Rom Oil Romania; GAS - Rompetrol GAS

*LTI – Lost Time Injury; LTIR - Lost Time Injury Rae; TRI – Total Recordable Injuries; TRIR - Total Recordable Injuries Rate

We apply the phased-in approach for introducing information, in accordance with Appendix C of ESRS 1, for the disclosure of sustainability information required under ESRS S2 (Value Chain Workers)."

Based on the assessments carried out to date, except the ones mentioned above, no other actual or potential material impacts on value chain workers have been identified in relation to Rompetrol's own operations or downstream activities. With regard to the upstream value chain, procurement is carried out primarily through an oil terminal supplied by multiple upstream sources, predominantly located in Kazakhstan. Due to the nature of this supply model, detailed information on working conditions at individual drilling or extraction sites remains limited. The Group's main contractual supplier has not reported any incidents, grievances, or adverse labour practices associated with the extraction areas of its own suppliers. Furthermore, given the diversified supplier base and the availability of alternative sourcing options,except for the aspects mentioned above, no other material risks or opportunities related to value chain workers have been identified at this stage.

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8 PROTECTION OF CONSUMERS AND END-USERS

ESRS S4

8.1 Strategy and concepts related to the protection of consumers and end-users

8.1.1 Interests and views of stakeholders

ESRS 2 SBM-2

Since the consumers and/or end-users could be materially impacted by our activities, we perceive them as a key group of our affected stakeholders. Therefore, their interests, views, and rights have a significant impact on our business model by making our strategy to continuously adapt and follow the requirements of the consumers. We adapt our strategy and business model based on material impacts such as information related impacts and other customer concerns, by having comprehensive policies and procedures that aim to protect and fulfil the consumers' needs, which include privacy, freedom of expression, and access to (quality) information.

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

ESRS 2 SBM-3

There were no significant negative impacts on consumers and end-users materialized or that could have arisen from our business activities in the reporting year. The relationship between our material opportunities arising from impacts and dependencies on our consumers and end-users, and on the other hand, our strategy and business model results from the products and commercial activities performed while serving our consumers.

Even though a strategy is not formalized, opportunities relate to communication, properly informing our customers, including labelling and marketing communications. Communication related to our products and other commercial activities is unrestricted, fostering social inclusion, with potential financial impacts on brand awareness, loyalty, and sales. Additionally, maintaining market integrity and transparency in product pricing can mitigate regulatory risks and liabilities for Oil & Gas - Midstream & Downstream undertakings, while also safeguarding our consumers from unfair pricing practices.

They are no consumers and end-users of our products that are inherently associated with a potential harm from using our products, as we are mainly and energy supplier.

Our products do not possess a significant risk and potential for chronic diseases during regular usage.

Rompetrol applies strict own rules on labelling, marketing information, aligned with local legislation and communication is not restricted to anyone to ensure social inclusion. Our gas station product users may be elderly, children or disabled, for which instructions for product use are in place. This is our positive impact which is the result of our business strategy and care for the consumers and end-users of our products.

Our companies provide information on the risks related to their products through safe storage and usage instructions. The actual and potential impacts on consumers and end-users identified are more related to labelling, marketing and safety information for our fuel station activities and wholesales. In particular, Rompetrol Rafinare SA, Rompetrol GAS SRL – as wholesalers and Rompetrol Downstream SRL, as a retailer, have identified IRO related to their consumers and end-users.

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Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the protection of consumers and end-users IROs from the double materiality analysis conducted.

8.1.3 Policies

ESRS S4-1

Our policies with regard to consumers and end-users are aligned with internationally recognised instruments relevant to consumers and/or end-users. This is due to our interest to respect, adopt and follow the internationally recognised instruments relevant to consumers and end-users, including United Nations (UN) Guiding Principles on Business and Human Rights.

Our policies in place aim at zero accidents or severe human rights issues and incidents connected to our consumers and/or end-users every year.

Consumers have not raised any complaint in respect to non-respect of the UN Guiding Principles on Business and Human Rights. We included different stipulations and practices in almost every policy and code we have, in order to assure that the needs of our customers are respected. There is no formalized marketing policy aligned with ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. Rompetrol continuously invests in consumer engagement research, carrying out strategic studies such as market measurement and segmentation, brand tracking and customer satisfaction. These efforts aim to understand the impact of fuel quality and the potential of retail products. Every year, Rompetrol obtains detailed information on consumer engagement and satisfaction through dedicated studies in the regions where it carries out retail operations.

Complaint Resolution Policy for Non-Compliant Products

Resolving complaints related to non-compliant products is a crucial aspect that reflects a company's commitment to quality, transparency, and responsibility towards consumers.

The company has a clear and transparent complaint management policy, which includes standardized procedures for receiving, investigating, and resolving complaints related to non-compliant products. The policy aims to ensure a quick, fair, and efficient process that protects consumer rights and maintains product quality standards.

Key Points of the Policy:

- **Accessibility of Complaints**: Customers can submit complaints through multiple communication channels as presented on our website (phone, email, online platform, in-store).
- **Prompt Response**: The company is committed to responding to all complaints within a short time frame.
- **Confidentiality and Transparency**: All complaints are handled confidentially, and the consumer is kept informed throughout the process.

Identification of Non-Compliant Products

Non-compliant products may include:

- Manufacturing defects.
- Damaged packaging or packaging that does not meet safety standards.
- Products that do not match their advertising description (e.g., incorrect labels, incomplete information).
- Products that do not meet legal quality or safety standards.

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Identifying Non-Conformities:

- **Quality Control Inspection**: Products are inspected during production and prior to delivery to prevent non-compliant products from reaching the market.
- **Customer Feedback**: Complaints received are monitored to identify trends in non-conformities (e.g., a common issue with a specific batch of products).

Complaint Resolution Process

1. **Receiving the Complaint**:
   - Complaints are collected through the established channels and are recorded in a centralized system for tracking and management.
2. **Evaluating the Complaint**:
   - **Detailed Investigation**: Complaints are examined by the responsible departments to identify the root cause of the issue and evaluate the nature of the non-conformity.
   - **Product Verification**: If necessary, the product may be requested back from the customer for physical inspection or laboratory analysis, depending on the nature of the non-conformity.
3. **Resolving the Complaint**:
   - **Product Replacement**: If the product is non-compliant, the customer will receive a replacement product at no additional cost.
   - **Refund**: If replacement is not possible or preferred by the customer, a full refund will be provided for the product.

Corrective and Preventive Measures:

- Process Improvements: To ensure the highest standards of product quality and customer satisfaction, the company is committed to continuously improving its quality control processes. In the event of quality-related incidents, Rompetrol will take proactive measures such as enhancing monitoring and testing protocols, strengthening supplier requirements, and, if necessary, changing suppliers to prevent similar occurrences in the future. Additionally, we maintain open communication with customers, promptly addressing concerns and implementing corrective actions to uphold our commitment to safety, compliance, and product excellence. By reinforcing these measures, we aim to build trust and long-term partnerships while ensuring that our products consistently meet the highest industry standards.

This process reflects the company's commitment to quality and respect for consumers, and transparency in complaint management can enhance public trust in the company's brand. Rapid and efficient complaint resolution is crucial not only for customer satisfaction but also for the continuous improvement of products and services

8.1.4 Processes for engaging with consumers and end-users about impacts

ESRS S4-2

The perspectives of consumers and/or end-users inform our decisions or activities aimed at managing the actual and potential impacts on consumers by assessing and evaluating through multiple means (forms, direct communication, complaints, etc.) the viewpoints of the consumers. The engagement with consumers and end-user occurs as often is necessary and all the results regarding the perspectives of consumers are analysed and if necessary, further applied in order to assure the best practices for the consumers of our products.

We have set a target to implement a general process for engaging with consumers and/or end-users quarterly, through various types of surveys. The perspectives of consumers and/ or end-users regularly inform a series of decisions or activities of Rompetrol in respect to our marketing or communication approach to our customers.

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Customer Satisfaction

Continuous monitoring of Customer Satisfaction is essential for Rompetrol as it keeps the **Rompetrol** brand consumer-focused, helps the company improve customer experience, which strengthens brand loyalty, trust, and sustainability.

- **Customer-Centric Approach**: By conducting quarterly satisfaction surveys at station exit targeting Rompetrol Go customers, Rompetrol is deeply committed to the principle of "customer first."
- **Continuous Improvement**: Monitoring satisfaction helps Rompetrol identify areas that require improvement and adapt products, services, and experiences based on real customer feedback.
- **Sustainable Business Growth**: A high level of satisfaction and engagement is correlated with customer loyalty, which is essential for sustainable growth.
- **Improved Corporate Reputation**: Annual and quarterly monitoring of Customer Satisfaction and Engagement benchmarked with Competition, shows that Rompetrol values and listens to its customers. This constant feedback aligns with sustainable practices, contributing to the long-term resilience of Rompetrol's activities.

Constant investment in market research and consumer opinion surveys has supported the growth of Rompetrol's brands in 2023-2025. **Rompetrol** conducted strategic studies in the countries where it operates retail operations, covering market measurement, market segmentation, retail brand monitoring, customer satisfaction and engagement, fuel quality impact, and market potential for retail products.

B2B Segment

Continuous engagement is essential for Rompetrol across all B2B segments (retail, wholesale, trading), as the company planned to monitor the satisfaction of its B2B customers,

In a dynamic context, Rompetrol explores ways to improve products and services for B2B customers.

Shop Retail Sales Platform Analytics

The company uses the NIQ analytics platform, which provides updated and detailed data on consumer trends and preferences in the retail sector, enabling in-depth analysis of product preferences, pricing expectations, and other factors influencing purchasing decisions. This platform supports a comprehensive understanding of consumer behavior, allowing Rompetrol to adapt its marketing strategies, product portfolio, and services more effectively, including optimizing product mix, offering targeted promotions, enhancing the customer experience, and implementing solutions aligned with customer expectations. In addition, NIQ data enables Rompetrol to monitor market evolution and anticipate shifts in consumer behavior, supporting long-term competitiveness and relevance.

Customer Safety

In Rompetrol fuel stations, in accordance with occupational health and safety requirements, as well as regulations concerning the prevention of risks associated with potentially explosive atmospheres (ATEX), warning and prohibition pictograms are displayed in all identified risk areas.

These include signage such as “No Smoking”, “No Mobile Phone Use”, and “No Open Flames”, visibly placed both inside the station cabin and on technological equipment located on the platform (e.g., fuel dispensers, LPG skid unloading point, cylinder storage rack).

Additionally, periodic on-site verifications are conducted within Rompetrol stations to assess compliance and ensure the proper functioning of equipment installed in areas classified as potentially explosive. Following these inspections, certification is obtained from INSEMEX, confirming the safe operation of equipment in zones with potentially explosive atmospheres.

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This integrated approach—combining clear safety signage, technical verification, and external certification—contributes to preventing incidents caused by potential ignition sources, ensuring regulatory compliance, and maintaining a safe operating environment for employees and customers.

Monitoring through Mystery Shopping

- Rompetrol implements a mystery shopping program to assess the quality of services offered to customers. This tool allows the company to measure the shopping experience from the customer's perspective, evaluating aspects such as customer service, store atmosphere, product availability, and staff efficiency.
- Mystery shopping helps identify areas where the customer experience can be improved. For instance, if a mystery shopper reports a negative experience regarding checkout wait times or product availability, Rompetrol can take corrective actions, such as staff training, adjusting stock levels, or improving customer flow management. This helps create a better experience for customers and strengthens their loyalty.

By analysing data from market studies and mystery shopping, the company takes corrective measures and implement strategies that address current consumer needs while anticipating future market trends. Furthermore, the information gathered is used to optimize communication with consumers, ensuring that it is relevant, personalized, and contributes to building a responsible and sustainable brand in the long term.

By continuously monitoring customer preferences and satisfaction, Rompetrol contributes to:

- **Waste Reduction**: By adapting more quickly to customer demands and managing stock more efficiently.
- **Innovation in Products and Services**: Developing solutions that meet consumer needs, including in the direction of responsible and sustainable consumption.
- **Increased Customer Satisfaction and Loyalty**: By offering better services and a pleasant and efficient shopping experience.

Beyond marketing and communication activities, the Company applies a structured approach to consumer engagement and due diligence, focusing on identifying, preventing and addressing material impacts, risks and opportunities related to consumers and end-users. Consumer-related risks are assessed through internal processes covering product quality and safety, compliance with applicable consumer protection legislation, contractual obligations, complaint handling mechanisms and monitoring of incidents or grievances.

Engagement with consumers is primarily conducted through operational channels, including customer service functions, complaint and feedback mechanisms, and regulatory interactions, which provide input for the identification of material issues and potential adverse impacts. Information collected through these channels is analysed by relevant functions and escalated to management where necessary, supporting corrective actions and continuous improvement.

This approach ensures that consumer engagement is not limited to promotional activities, but forms part of the Company’s broader due diligence processes, contributing to the management of material consumer-related impacts and risks and to the protection of consumer rights and safety.

This approach not only improves customer relationships but also contributes to building a more responsible brand that is adaptable to market changes.

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8.1.5 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

ESRS S4-3

We included in our policies and procedures means to contribute to remedy where we caused or contributed to negative impact on consumers and end-users. We have specific channels in place for consumers and/or end-users to raise their concerns and needs. These channels are established by Rompetrol itself, such as the whistle-blower mechanism, and cannot be classified as third-party mechanisms. We support the availability of such channels by our business relationships, and we track and monitor issues raised and addressed by consumers and end-users of our products and ensure the effectiveness of the channels.

The Group Compliance Department oversees the Whistleblower reporting channel (speakup@rompetrol.com), which is also accessible externally via KMGI's official websites. This channel allows any individual—whether an employee, collaborator, or third party—to confidentially submit a complaint. To ensure its effectiveness, the process is governed by strict confidentiality protocols, timely investigation procedures, and a zero-tolerance policy for retaliation.

As part of its business development activities, Rompetrol monitors consumer engagement and satisfaction through its Marketing Research function. This function is responsible for collecting and analysing information related to customer needs, expectations and feedback, with the objective of supporting informed decision-making regarding products and services.

Consumer monitoring activities are conducted on an ongoing basis and provide input for the evaluation of market trends, customer satisfaction levels and potential areas for improvement. The information gathered supports the identification of issues that may affect consumers and contributes to the review and adjustment of commercial and operational practices, where relevant, in order to ensure alignment with applicable consumer protection requirements and internal standards.

We regularly assess the consumers and/or end-users' awareness and trust in our reporting mechanisms for addressing their concerns or needs during consultation for materiality. Furthermore, we have implemented policies to protect individuals who use these channels against retaliation. For further information, please refer to ESRS G1-1. Consumers and/or end-users may find this information on our website and social media platforms.

8.1.6 Actions

ESRS S4-4

The Company addresses and seeks to prevent material negative impacts on consumers and end-users through a structured due diligence approach embedded in its operational policies and practices. This includes providing accurate and transparent information on products, their intended use and associated risks, in line with applicable product safety and consumer protection legislation, as well as implementing controls to minimise consumer exposure to potential adverse impacts.

The identification and assessment of actual and potential consumer-related impacts are supported by internal processes covering product compliance, quality assurance, incident monitoring, consumer complaints and feedback mechanisms, as well as benchmarking against industry best practices. Where potential or actual negative impacts are identified, the Company applies a formal resolution and remediation process for non-compliant products, which may include corrective actions, product withdrawal or other appropriate measures, in accordance with internal procedures and regulatory requirements.

Consumer engagement and feedback channels provide input into the ongoing evaluation of risks and the effectiveness of mitigation measures, enabling continuous improvement of practices related to

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consumer health, safety and rights. These processes support the management of material consumer-related impacts and risks identified through the Company's materiality and risk assessment processes.

During the reporting period, no severe human rights issues or incidents related to consumers or end-users were identified or reported, based on the Company's monitoring, grievance handling and incident management processes.

8.1.7 Targets

ESRS S4-5

Fuel Stations in Romania

The Rompetrol brand is one of the leading players in the Romanian market, offering a wide range of products and services highly appreciated by customers, with customer satisfaction being at the level of the market average. Rompetrol's market share in the retail segment for individuals has consolidated at the level of previous year, due to marketing efforts, the variety of benefits provided through the "Rompetrol Go" loyalty program, the superior quality of fuel, and the quality of its convenience store and restaurant The direct station experience immediately after a visit is periodically evaluated through the Rompetrol Go app, showing a satisfaction score of 93 points on a 1-100 scale, a 2-point increase (Customer Experience Study through the Rompetrol Go app, October 2025 vs September 2024 wave compared) – a score indicating a high level of satisfaction among app users.

There are no targets or policies aligned to IROs or ESRS. Rompetrol previously defined some targets related to **customer satisfaction** results as follows. For our quarterly surveys the following apply:

Benchmarks	**1-5 scale**	**1-100 scale**
Threshold (minimum satisfaction score for regular clients)	4	80
Target (the key objective)	4.25	85
Challenge (the optimum level expected)	4.5	90

We achieved these targets on a **quarterly basis,** both for our company owned company operated fuel stations (CODO), as well as for the dealer owned, dealer operated (DODO) during the reporting period.

The company defines its customer satisfaction targets based on insights gathered from customer surveys, feedback mechanisms, complaint resolution processes, and industry best practices. While Rompetrol does not engage directly with every end-user in target-setting, it considers input from customer service interactions, market research, and industry proxies to ensure that targets align with consumer expectations and operational capabilities. Performance is monitored through customer satisfaction surveys, service quality evaluations, and complaint resolution metrics. The company regularly reviews customer feedback and service performance data to identify trends, strengths, and areas for improvement. Based on performance evaluations, Rompetrol implements corrective actions and process optimizations to enhance customer experience. This may include adjusting service standards, refining quality control measures, improving response times, or enhancing digital customer engagement platforms.

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GOVERNANCE INFORMATION

9 Business conduct

ESRS G1

9.1 Governance structures and risk management

9.1.1 The role of the administrative, management and supervisory bodies

ESRS 2 GOV-1

Rompetrol Rafinare SA is administered in a unitary system by a Board of Directors ("BOD" or "the Board") and is constituted in accordance with the provisions of the Articles of Incorporation of the Company. The Directors are elected by the Ordinary General Meeting of Shareholders ("OGMS"), at the proposal of the Board of Directors or the shareholders. The corporate bodies are structured as follows: the OGMS, which is the highest decision-making forum of the company, and the BOD. The OGMS is the main corporate governance body to discuss, approve or amend the annual financial statements as well as other financial related duties. The role of management and supervision related to business conduct is assigned to BOD members, with all members having the required expertise on business conduct matters. The main supervisory body is represented by the Board of Directors. The Board of Directors is responsible for the fulfilment of all measures necessary for the Company's activity, as well as for the supervision of the activity. All Group policies also apply to BOD members.

The Board of Directors of Rompetrol Rafinare SA has the following specific responsibilities and attributions related to business conduct:

- establishes the main directions of activity and development of the company,
- appoints and dismisses the directors and supervises their activity,
- prepares the **annual activity report for Rompetrol Rafinare SA and subsidiaries, including the sustainability report**,
- carries out the decisions of the OGMS.

According to the above-mentioned duties:

- the Board of RRC was convened for 24 meetings during 2025, out of which 3 - to approve the convening of General Meetings of Shareholders, the quarterly financial documentation as well as the key contracts to be signed and further executed by the company, including those regarding the main company's activity of acquisition of raw materials and selling of the petroleum products resulted from its processing activity.
- Acknowledge the measures envisaged by the executive management aiming to improve the overall activity.

In 2025, 4 of the Board of Directors participated in several targeted development activities totaling 49 hours. These included both formal training sessions and industry conferences, providing an overview of governance, ESG, and risk management topics. The sessions addressed governance best practices, ESG risk management, alignment with international sustainability standards, and operational safety awareness, reflecting the Board's ongoing need and interest in developing ESG knowledge and capabilities.

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The Board had quarterly meetings to discuss and be informed about the information received through the Whistle blower channel which raised certain allegations regarding the ethical standards and conflict of interests.

*Rompetrol Rafinare is a member of ARIR, an association dedicated to promoting transparency and fair practices among companies listed on the Bucharest Stock Exchange.

The approach is similar for all entities affiliated to RRC.

9.1.2 Description of the processes to identify and assess material impacts, risks and opportunities

ESRS 2, IRO 1

In the process to identify material impacts, risks and opportunities (IROs) in relation to business conduct matters, we included all Rompetrol's entities as well as the value chain. Associated impacts, risks and opportunities are identified and assessed in the double materiality analysis through internal consultation and other sources.

See also Section 1.5.4 Material impacts, risks and opportunities and their interaction with strategy and business model presented above, summarizes the water and marine resources IROs from the double materiality analysis conducted.

The assessment was carried out under the double materiality analysis process.

9.2 Governance and business practices

9.2.1 Business conduct policies and corporate culture

ESRS G1-1

Rompetrol adopted KMG International Business Conduct and Code of Ethics, which includes all values and principles of conduct, responsibilities and obligations that define the quality of professional activity. This code serves as a mandatory line of conduct and encourages the responsibility and involvement of the contractual staff within Rompetrol, so that they carry out a competent and responsible activity, in accordance with professional ethics. Addressing our material IROs, the Code reflects core values and behavioural rules, aligning with the Universal Declaration of Human Rights and ensuring the highest integrity standards.

Rompetrol's General Director is the most senior level in the organisation that is accountable for the implementation of the policy, and monitoring compliance.

The Businesss Conduct and Code of Ethics has the goal of promoting ethical values and principles, in order to increase the quality of services offered and to protect our Group's reputation. Rompetrol's business is based on a clear and long-term strategic orientation towards integrity, honesty and responsibility. Its core set of values includes:

- **People** – the company places the highest priority on the needs of its employees. The actions are always determined by their dynamism, contemporary spirit, creativity and experience
- **Care, Integrity and Responsibility** – Rompetrol is a trustworthy worldwide partner and a valued corporate citizen, taking responsibility for its actions and acting with honesty towards its stakeholders
- **Determination** – the strength of the business stems from the company's firmness of will and determination to succeed
- **Environmental Protection** – the company and its partners adhere to all the national laws and regulations governing the environment and proper management of resources

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- **Sustainability** – the company supports the e principles set forth in the Universal Declaration of Human Rights and maintain the high standards of integrity in its business operations
- **High Quality** – the company is committed to quality in everything we do, and we strive to continuous improvement;
- **Commitment to Leadership** – Rompetrol uses its experience, technology and perseverance to offer products and services of the high standards and is committed to leadership in all its actions.

By adopting the KMG International Business Conduct and Code of Ethics, Rompetrol establishes, develops and promotes its corporate culture and complies with the following organizational and behaviour rules in all its activities.

A Business Conduct and Code of Ethics plays a crucial role in both promoting and evaluating corporate culture by setting clear expectations for behaviour, fostering accountability, and providing mechanisms to measure ethical adherence.
Promoting Corporate Culture
Our Code of Ethics:

✓ Defines Core Values – Establishes principles like integrity, fairness, and transparency, aligning employees' actions with the company's mission.

✓ Sets Behavioural Standards – Outlines expected conduct in areas like conflicts of interest, bribery, workplace respect, and data confidentiality.

✓ Provides Ethical Decision-Making Guidelines – Helps employees navigate dilemmas by offering frameworks for responsible choices.

✓ Encourages Ethical Leadership – Guides managers to lead by example, reinforcing ethical behaviour at all levels.

✓ Supports a Speak-Up Culture – Establishes whistleblower protections and reporting channels to encourage employees to report misconduct.

The Group Compliance department, as owner of the regulation of Business Conduct and Code of Ethics, is managing and promoting the Business Conduct and Code of Ethics through trainings and awareness campaigns.

Rompetrol conducts its business in accordance with applicable laws, internal policies and transparency requirements, ensuring that accurate and relevant information is made available to customers and business partners where required. Information disclosure and communication practices are designed to support compliance, informed decision-making and the protection of stakeholder interests. The Company applies equal opportunity principles in its employment practices and complies with applicable human rights, civil rights and labour legislation. Any form of abuse, harassment or discrimination in the workplace is prohibited under internal policies and procedures.

Rompetrol maintains internal controls and procedures to safeguard its financial and non-financial resources, including the accuracy of financial records, the protection of company assets, the responsible handling of confidential information and the protection of intellectual property, in line with applicable legal and internal requirements.

Rompetrol is also highly committed to respect and follows all the applicable laws and regulations, and does not tolerate any form of conflict of interests, bribery and corruption. The Group is politically-neutral and we do not engage in any political activities

Rompetrol aims to be a socially responsible member of the local communities by being continuously active and involved in projects for the benefit of the local communities.

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As part of the business conduct and corporate culture, Rompetrol adopted the KMG International Group-wide code as well as policies developed and implemented a series of specific business policies, including, the following:

- Remuneration Policy - Establishes fair and competitive compensation structures aligned with industry standards and regulatory requirements.
- Quality, Health, Safety and Environment Policy - Defines the company's commitment to maintaining high standards in operational safety, environmental protection, and workplace well-being.
- Whistleblower Policy - Provides a secure channel for employees to report unethical behaviour, misconduct, or regulatory violations without fear of retaliation.
- Anti-corruption and anti-bribery Policy - Outlines measures to prevent bribery and corruption, ensuring compliance with international and national anti-corruption laws.
- Diversity and Inclusion Policy - Promotes an inclusive work environment that values diversity in gender, background, and perspectives, fostering equal opportunities for all employees.
- Marketing Policy - Ensures ethical and responsible communication, advertising, and branding practices aligned with regulatory and corporate standards.
- Tax Policy - Establishes guidelines for transparent and compliant tax management - while fully complying with the legal and regulatory frameworks of the countries in which it operates. The policy underpins all tax-related activities and it is guided by principles of compliance with applicable laws, transparent and proactive engagement with tax authorities, accurate and detailed tax reporting, and the selection of efficient tax structures without compromising ethical standards or commercial integrity. Developed by the Financial Director and approved by the Executive Director, the policy is a dynamic document, regularly reviewed and updated in line with strategic developments. To ensure compliance with national and international regulations, Rompetrol has implemented dedicated systems, established specialized internal teams, and developed detailed guidelines to promote awareness and adherence to fiscal requirements. The company maintains proactive relations with tax authorities, including the negotiation of Advance Pricing Agreements for key intra-group transactions, thereby reducing the risk of disputes. Ongoing initiatives include monitoring legislative developments, organizing regular employee training, and participating in public consultations through professional associations, with the overarching objective of achieving full compliance with tax legislation.
- Conflict of Interest Procedure - Provides mechanisms for identifying, disclosing, and mitigating conflicts of interest to maintain ethical decision-making.

The responsibilities for implementing Group policies and procedures are set within Policy no. 1 - Internal Regulations Management Policy. As such, the document owner of the respective policy is responsible for "drafting, content, update, implementation, administration and staff training of the internal regulation". Also, the document owner is responsible for implementation of the respective internal regulation. Without being limitative, the following implementation methods can be used: workshops, trainings, awareness campaigns.

The directors of key functions are responsible for each of these policies, ensuring their proper implementation and adherence. Additionally, all employees are required to be familiar with these policies and comply with their provisions. To facilitate accessibility, all policies are available to employees on the internal SharePoint platform and are also communicated through internal emails.

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9.3 Protection of whistleblowers

ESRS G1-1

Rompetrol has developed a framework of counselling and complaint resolution mechanisms, aimed at making each employee, business partner and stakeholder responsible for their conduct. This framework encourages the reporting of any incidents of non-compliance, environmental issues or social injustices to the relevant departments, including Group Compliance, and Human Resources. The aim is to ensure that every concern is considered and addressed, fostering a culture of integrity and ethical conduct throughout the organisation. The Group's target is to address and finalize an investigation for each grounded concern raised along the year.

Taking all these into account, the Group implemented multiple channels through which concerns and claims could be reported to the Group Compliance Department. Therefore, the concerns and claims can be reported as it follows:

- Whistleblower channel: An external email (speakup@rompetrol.com) accessible also from the company website, which allows confidential reports of unethical or illegal behaviour;
- Departmental email: Direct communication via compliance@rompetrol.com, offering another level of confidentiality and direct access to the responsible department
- Direct Communication: Employees, suppliers, customers, collaborators or any other party are also encouraged to report directly to members of the Group Compliance Department by email or in writing.

All these channels are designed to ensure that all complaints are handled with the utmost confidentiality in accordance with legal and internal regulations, emphasizing a non-retaliation policy against anyone who raise a concern in good faith, who are whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937 of the European Parliament and of the Council. The company confirms that it is subject to Romanian Law no. 361/2022, which implements EU Directive 2019/1937 on the protection of whistleblowers.

Access to the concerns received to this channel is granted only to two members of the Group Compliance Department and information is managed with strict confidentiality.

Rompetrol's Group Compliance Department encourages all employees and collaborators to report any violations of the Code of Ethics and Business Conduct, as well as any ethical concerns or dilemmas that could exist.

When a complaint is submitted, a detailed analysis/investigation is carried out by the responsible department. All investigations performed by Forensics Department are done according to Internal Investigations Methodology in place. Beyond the procedures to follow-up on reports by whistleblowers in accordance with the applicable law transposing Directive (EU) 2019/1937, Rompetrol investigates procedures on business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively. This structured process ensures that any negative impacts are addressed and rectified promptly. To increase awareness and understanding, periodically training sessions are held, focusing on the importance of reporting and the use of available mechanisms for this purpose.

Whistleblower Policy

The Whistleblowing Policy is approved at the KMGI Board of Directors level and is a critical component of the grievance mechanism managed by Group Compliance Department. It ensures confidentiality and, if the whistleblower wishes, anonymity.

Addressing the negative potential impact on the complainer and associated risk for Rompetrol, the KMGI's Protection of Whistle-blowers policy empowers employees, suppliers, clients, and collaborators or any other third party to raise concerns or complaints in good faith.

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Rompetrol's General Director is the most senior level in the organisation that is accountable for the implementation of the policy, and monitoring compliance.

The scope and the objectives of the Whistleblower Policy are to enable every employee, supplier, customer, collaborator or any other party accountable to honestly report concerns or complaints. Besides this, the Whistleblowing Policy guarantees confidentiality and protection against retaliation for those who use the whistleblowing channel and allows the reporting of any transactions or events suspected of violating the laws, internal regulations or ethical standards of the company.

The Whistleblower Policy also assures the maintaining of an accessible channel for whistleblowers, including external access through the company's website.

To ensure the effectiveness of, we have structured monitoring mechanisms that promote confidentiality, prevent retaliation, and track resolution outcomes.

- Confidential Reporting Channels – dedicated email addresses to ensure anonymity.
- Group Compliance Department oversees complaints. A structured process ensures timely investigation, with defined escalation steps. Reports are categorized (e.g. safety violations, human rights concerns) for systematic handling.
- Protection Against Retaliation - Clear policy prohibiting retaliation against whistleblowers. HR Legal and Group Compliance Departments monitor employees who report concerns to ensure they do not face discrimination, demotion, or dismissal.
- Regular Reporting & Transparency - Board-level reporting on whistleblowing cases and policy effectiveness; inclusion in sustainability reports.

During the reporting period, from January to December 2025, Group Compliance received a total of 15 notifications through this channel in relation with Rompetrol Rafinare and its affiliates entities – Rompetrol Downstream. Of these, 13 investigations were closed and two are in progress (no bribery and corruption incidents were confirmed during the reporting year).

Our targets are in our Whistleblowing Policy and relate to full compliance this means that all cases received to be analysed, managed and investigated according to their specificities and regulations in place.

9.4 Prevention and detection of corruption and bribery

ESRS G1-3

Rompetrol is committed to complying with ESG principles in order to create a sustainable and responsible business environment. To support these values, specific objectives have been defined to promote ethical conduct, protect personal data and ensure compliance within the company's operations.

We have implemented procedures aimed at preventing, detecting, and addressing any allegations or incidents of corruption and bribery which are outlined in the **Anti-corruption and anti-bribery Policy (ABAC Policy).** The reporting, review/investigation and follow-up processes of suspected non-conformities in relation with Rompetrol's internal rules and regulations are anchored in a comprehensive framework established by Group Compliance Department. Group Compliance Department is the owner of the Whistleblower process and objectively analyses each complaint received separately from the chain of management involved in the matter. Periodically, investigated cases are reported to Management.

Rompetrol ensures transparent and structured reporting of ethics, compliance, and misconduct investigations to its management and supervisory bodies**.** The Forensics Department compiles periodic reports detailing key findings, case resolutions, disciplinary actions, and systemic risks**,** which are submitted quarterly or annually to governance bodies. The Board of Directors and Supervisory Board receive high-level updates on significant compliance cases, while the Audit Committee oversees financial misconduct investigations.

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For high-risk cases escalation procedures ensure immediate executive management review and potential regulatory reporting. Confidentiality is strictly maintained, with anonymization measures in place to protect whistleblowers, ensuring compliance with GDPR and internal data protection policies.

Anti-corruption and anti-bribery Policy (ABAC Policy)

Rompetrol has a zero-tolerance policy towards corruption and bribery, applying rigorous standards at all levels of its operations and among all business partners, including suppliers and contractors. This uncompromising stance is reflected in the Group's Anti-Bribery and Anti-Corruption Policy, a mandatory internal regulation for the conduct of our business. Rompetrol has taken extensive steps to integrate ABAC principles into its operations by implementing robust policies, training programs and contractual clauses designed to mitigate risks and promote a culture of integrity and transparency.

The main scopes and objectives of the ABAC Policy are as following:

- Protecting the Group's entities reputation and ensuring compliance with legal and regulatory requirements,
- Minimizing the risk of bribery and corruption in all business relationships;
- Increasing employee awareness and understanding of the risks of bribery and corruption;
- Promoting integrity, accountability and transparent business management.

Rompetrol developed and implemented a series of procedures through which the ABAC Policy is enforced, as it follows:

- Regular dissemination of policy details to all employees to ensure widespread understanding;
- Implementation of training sessions aimed at preventing bribery and corruption, and promoting ethical behaviour; Rompetrol ensures a risk-based approach to anti-corruption training by identifying functions with higher exposure to corruption risks and providing them with enhanced, in-depth training. Departments such as procurement, sales, Human Resources, Finance and departments which collaborate through their activity with public authorities undergo specialized anti-bribery and compliance programs tailored to their specific risks. These training sessions cover conflict of interest management, third-party due diligence, fraud detection, and ethical decision-making, reinforcing adherence to the Anti-Corruption and Anti-Bribery Policy. These trainings are done periodically according to the Anti-Bribery and Anti-Corruption Policy. Since in 2024, we had a training coverage of 100% of employees considered to be exposed to ABAC risks, no additional trainings were carried out in 2025.
- Establish clear reporting channels for any suspected policy violations.

The anti-bribery and anti-corruption policy is supported by a suite of documents detailing the actions and principles necessary to prevent and eliminate the risks of bribery and corruption. These documents include the **Internal Order Regulations (ROI) of each entity,** the Code of Ethics and Business Conduct, the Conflict-of-interest procedure and the Whistleblower Policy. ABAC regulations, including the Anti-Bribery and Anti-Corruption Policy, the Conflict-of-Interest Procedure and the Whistleblowing Policy, are communicated to all Group entities, employees, business divisions and collaborators, ensuring universal adherence to ethical standards.

Group Compliance Department reports to the Board of Directors on how the ABAC Policy is implemented, and also the outcomes that came from the policy.

Rompetrol maintains a rigorous attitude against fraud, bribery, corruption and any relations with entities on international sanctions lists, implementing strict controls to mitigate these risks. We provide employees with a comprehensive education on the ethical principles, guidelines and standards that dictate their behaviour in the workplace. Topics such as the code of business conduct, anti-money laundering measures and anti-bribery and anti-corruption principles are essential components of employee training from the start of employment as part of their onboarding process.

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ESRS G1-4

During the 2025 fiscal year there were zero cases of corruption or bribery. Our ABAC trainings targets are in our ABAC Policy and relate to full compliance.

9.5 Management of suppliers

9.5.0 Management of relationships with suppliers

ESRS G1-2

To prevent late payments specifically to SMEs, the company implemented a set of policies – within the finance and procurement departments, that includes payment procedures, acquisition practices and other financial observations. The respective department leaders are the most senior level accountable for the implementation of those policies. Payments are handled entirely by the Finance Department. Regarding acquisition and procurement practices, the senior-level accountable person is the Group Procurement Director.

Rompetrol established a specific approach in managing its relationship with its suppliers and took into consideration the risks that could appear in relation with its supply chain and the impact on sustainability matters. In this regard, we developed and implemented the **Suppliers Code of Conduct** (available publicly on company's websites for consultation by stakeholders and reflecting the Employees' Code of Conduct described in this report).

Rompetrol has a strategic approach to supplier engagement, emphasizing the company's dedication to promoting a supply chain that is not only compliant, but also supports sustainable development and responsible business practices. Rompetrol implemented this high-performance **supplier management system** that ensures rigorous pre-selection processes, periodic questionnaires and performance evaluations to ensure compliance with our sustainability standards.

The **Suppliers Code of Conduct** was established drawing inspiration from the **Code of Ethics and Business Conduct,** ensuring that both Rompetrol and its entire network of suppliers strictly comply with all relevant local and international regulations. The Suppliers Code of Conduct covers critical business areas such as human rights, workplace safety, fair employment practices, environmental protection and maintaining high ethical standards. Rompetrol requires that both potential and existing suppliers align with the company's commitment to integrity and ethical business conduct.

Rompetrol wants to collaborate only with suppliers who embody these specific values. In this regard Rompetrol uses a rigorous pre-qualification process that reflects the expectations set out in its Code of Ethics and Business Conduct. This process assesses potential suppliers against the specific criteria set out in the Supplier Code of Conduct, assessing their environmental management systems, labor practices, health and safety policies and commitment to ethical business operations. Only the suppliers that would successfully pass the prequalification stage would receive the approval of the company and the recognition of adhering to the Rompetrol's Suppliers Code of Conduct.

9.5.1 Payment practices

ESRS G1-6

Rompetrol ensures that supplier payments are made in accordance with contractual provisions agreed upon with each business partner. There is no standard payment term; terms vary by supplier category and contract agreements.

In 2025, Rompetrol adhered to the agreed contractual terms, with no recorded delays in supplier payments. The average time to pay an invoice, measured from the start of the contractual or statutory payment term, was 49 days.

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The formula for calculating the percentage of payments made within the agreed standard terms is the average supplier balance divided by the cost of goods sold, multiplied by 360.

It is important to note that these figures exclude commercial contracts for crude oil, which follow distinct agreements; SMEs do not supply crude to the company.

As of the reporting period, there were no ongoing legal proceedings related to late payments registered for Rompetrol Rafinare.

Subsequent Event

On 18 March 2026, an incident occurred at Midia Marine Terminal (MMT), a company within the KMG International Group, which is not included in the scope of consolidation of the present sustainability report. During crude oil unloading operations at the terminal, a tugboat assisting the berthing and connection of a tanker sank, with five persons on board, all employees of MMT. At the date of this report, an investigation is ongoing in order to determine the causes and circumstances of the incident.

Further information regarding this event, including investigation outcomes and any related measures, will be disclosed in the KMG International Sustainability Statement for the financial year 2026.

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APPENDIX 1 - EU TAXONOMY DISCLOSURES ACCORDING TO ARTICLE 8 OF REGULATION (EU) 2020/852

1. Regulatory context and reporting scope

This Statement presents the disclosures required under Article 8 of the Taxonomy Regulation (Regulation (EU) 2020/852) for **Rompetrol Rafinare S.A.** and its subsidiaries – **Rompetrol Downstream SRL, Rompetrol Quality Control SRL, Rompetrol Gas SRL, Global Security Systems S.A., Rompetrol Logistics SRL, Rom Oil S.A.** (together comprising Rompetrol Rafinare Group, or Rompetrol) – for the financial year 2025. The assessment covers all economic activities carried out within Rompetrol during the reporting period: **1 January - 31 December 2025**.

The Taxonomy Key Performance Indicators (KPIs) have been calculated and presented in accordance with Article 8 Delegated Act (Commission Delegated Regulation (EU) 2021/2178) and its subsequent amendments, Delegated Regulation (EU) 2022/1214 and Delegated Regulation (EU) 2023/2486. While the identification and assessment of taxonomy-eligible and -aligned economic activities has relied on the list of activities and technical screening criteria provided by the primary Delegated Regulation (EU) 2021/2139, known as the Climate Delegated Act, and its subsequent amendments – Delegated Regulation (EU) 2023/2485 and Delegated Regulation (EU) 2024/3215 – and the Environmental Delegated Act (Delegated Regulation (EU) 2023/2486).

Although the EU Omnibus Regulation introduced a simplified reporting option from 2025 onward, under Regulation 2026/73, Rompetrol has chosen not make use of the materiality threshold simplification for FY2025 and will continue reporting under the full Article 8 framework to ensure consistency, accuracy, and comparability with previous years. However, the reporting templates have been updated to the latest regulation.

In the following section, Rompetrol, as a non-financial undertaking, reports the share of:

- Turnover,
- Capital Expenditure (CapEx) and
- Operating Expenditure (OpEx)

associated with eligible and aligned economic activities. In line with the Taxonomy Regulation, the relevant economic activities have been assessed against all six environmental objectives.

Following the internal assessment, 21 taxonomy-eligible activities were identified across the Group. These activities relate to operations within Rompetrol Rafinare S.A., Rompetrol Downstream SRL, Rompetrol Quality Control SRL, Rom Oil S.A. and Rompetrol Gas SRL.

To determine eligibility, all economic activities across all Group entities were screened against the full list of activities included in the Climate and Environmental Delegated Acts, covering all six environmental objectives. This process involved reviewing each activity performed within the Group and comparing it with the activity descriptions and scope notes set out in the delegated acts. Whenever an operational activity matched the description of a taxonomy activity, and monetary values corresponding to one or more KPIs for 2025 could be associated with that activity, it was classified as taxonomy-eligible. Through this comprehensive screening exercise, a total of 21 eligible activities were identified across Rompetrol Rafinare SA, Rompetrol Downstream SRL, Rompetrol Quality Control SRL, Rompetrol Gas SRL, and Rom Oil SA.

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From this set of eligible activities, taxonomy alignment was assessed by evaluating each activity against the three mandatory alignment criteria.

- Substantial contribution: Each eligible activity was reviewed against the applicable technical screening criteria to determine whether it contributes substantially to the associated environmental objective.
- Do No Significant Harm (DNSH): Compliance with DNSH requirements was verified by assessing whether the activity avoids adverse impacts on the other five environmental objectives, in line with the criteria set out in the delegated acts.
- Minimum safeguards: Adherence to minimum social safeguards was examined by considering the governance, risk management, and compliance processes relevant to the principles referenced in the Taxonomy Regulation, such as the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.

2. Our Activities

Economic activities eligible for taxonomy and their assessment for alignment

Rompetrol operates across the refining and retail sectors, supported by activities in natural gas distribution, fuel logistics and laboratory services.

An economic activity is considered eligible for Taxonomy if it fits the description of the activity presented in the EU Taxonomy. In order to identify eligible activities performed by Rompetrol, we carried out a full assessment of eligible activities and compared these activities with the description of economic activities listed in Annexes I or II of the EU Delegated Act on Climate Taxonomy and activities listed in Annexes I, II, III and IV of the EU Delegated Act on Environment.

The EU Taxonomy assessment commenced with the establishment of dedicated working groups involving the relevant operational departments, in order to obtain a detailed understanding of the operating model of each reporting entity. As an initial step, the main revenue streams were identified, using the applicable NACE codes as a reference point; however, the analysis was not limited to the NACE classification alone. Based on this assessment, turnover was mapped to the list of EU Taxonomy-eligible economic activities. Subsequently, investments (CapEx) and operating expenses (OpEx) were analysed in detail, using both financial and operational input. This analysis enabled the mapping of eligible activities to the corresponding economic activity descriptions set out in the EU Taxonomy, ensuring an accurate and substantiated classification.

Below is an overview of the eligible activities with the associated KPIs and descriptions by Rompetrol entity. Only entities with at least one eligible activity are presented in this section.

Rompetrol Rafinare SA (refineries)

- **Rompetrol Rafinare SA** (hereinafter referred to as Rompetrol Rafinare or RRC) - is KMG International NV's most important asset in Romania. In December 2025, Rompetrol Rafinare SA had 5 directly controlled subsidiaries and 2 indirectly controlled subsidiaries in Romania, as well as 2 work points, Petromidia Refinery in Năvodari, Constanța and Vega Refinery in Ploiești, Prahova. The main field of Rompetrol Rafinare SA is the "manufacture of refined petroleum products" according to NACE 19.20. This main activity is not taxonomy-eligible. However, other revenue streams have been identified as eligible, as shown in the table below, together with other relevant capital and operating expenses.

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	Activity	Turnover	CapEx	OpEx	Description
CCM 3.10	Manufacture of hydrogen			☑	Operational activities supporting hydrogen production processes.
CCM 3.14	Manufacture of organic basic chemicals	☑		☑	Production of organic basic chemical inputs used in refinery and petrochemical operations.
CCM 4.1	Electricity generation using solar photovoltaic technology			☑	Operation and maintenance activities for solar-based electricity generation.
CCM 4.9	Transmission and distribution of electricity	☑	☑	☑	Works and operational measures ensuring reliable electricity transmission and distribution across refinery facilities.
CCM 4.15	District heating/cooling distribution	☑		☑	Activities supporting the distribution of district heating and cooling within refinery infrastructure.
CCM 4.31	Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system		☑	☑	Maintenance and replacement works ensuring efficient heat and cooling production from gaseous fuels.
CCM 5.1	Construction, extension and operation of water collection, treatment and supply systems	☑	☑	☑	Development of a new raw water pumping station.
CCM 5.2	Renewal of water collection, treatment and supply systems		☑		Renewal and replacement of assets to maintain reliable water collection and treatment operations.
CCM 5.3	Construction, extension and operation of wastewater collection and treatment	☑		☑	Works on reliable water collection and treatment operations.
CCM 5.4	Renewal of wastewater collection and treatment		☑		Upgrades and refurbishment of wastewater treatment infrastructure to maintain compliance and efficiency.
CCM 7.2	Renovation of existing buildings		☑		Renovation and structural rehabilitation works across administrative and industrial buildings.

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CCM 7.3	**Installation, maintenance and repair of energy efficiency equipment**	☑	**Installation and maintenance of equipment improving energy efficiency in refinery buildings and processes.**
CCM 8.1	Data processing, hosting and related activities	☑	IT infrastructure and data-processing operations supporting refinery systems.
CCM 8.2	Data-driven solutions for GHG emissions reductions	☑	Implementation of digital solutions aimed at monitoring and reducing GHG emissions.
CCA 14.1	Emergency Services	☑	Acquisition and operation of equipment and systems supporting emergency response and safety management.

Rompetrol Downstream SRL

- **Rompetrol Downstream SRL** (hereinafter referred to as DWS) carries out its retail activity in gas stations distributed throughout Romania and the 6 fuel depots in Arad, Craiova, Șimleu Silvaniei, Vatra Dornei, and Zărnești. The main activity of the company consists in "retail trade of motor fuels in specialized stores" according to NACE code 47.30, which is also not eligible according to the EU Taxonomy

	Activity	Turnover	CapEx	OpEx	Description
CCM 5.4	Renewal of wastewater collection and treatment		☑	☑	Renewal and maintenance for wastewater systems, incl. equipment replacement and routine cleaning of treatment units.
CCM 6.15	Infrastructure enabling low-carbon road transport and public transport		☑		Installation of speed limiters and protective barriers at stations.
CCM 7.2	Renovation of existing buildings		☑		Renovation works on pumps, tanks, and station canopies to ensure continued operation.
CCM 7.3	Installation, maintenance and repair of energy efficiency equipment		☑	☑	Energy-efficient station equipment and works on refrigerated containers/platforms.
CCM 8.1	Data processing, hosting and related activities		☑		Implementation of an on-premise software solution enabling the storage, management, transmission and processing of operational data across the station network and headquarters.

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CCA 14.1	Emergency Services		☑	☑	Measures required for ISU re-authorization of Fundeni station.
PPC 2.4	Remediation of contaminated sites and areas			☑	Depollution costs for Brătianu 1 site after a tank failure and fuel infiltration.

Rompetrol Quality Control S.R.L.

- **Rompetrol Quality Control SRL** (hereinafter referred to as RQC) provides laboratory and product quality assurance services that support refinery operations and ensure compliance with national and international product standards. The main activity of the company consists in "technical testing and analysis" in specialized laboratories according to NACE code 71.20 – this activity is NOT eligible for taxonomy.

	Activity	Turnover	CapEx	OpEx	Description
CCM 7.2	Renovation of existing buildings			☑	Renovation works consisting of the hygienisation and refurbishment of existing locker rooms and sanitary facilities.

Rompetrol Gas S.R.L.

- **Rompetrol Gas SRL** (hereinafter referred to as RGS) handles the distribution and sale of liquefied petroleum gas (LPG), including both bulk deliveries and cylinder-based supply for household and industrial consumers. The main NACE code of 46.81 "Wholesale of solid, liquid and gaseous fuels and related products" is also not taxonomy-eligible. However, secondary streams of revenue under 68.20 "Rental of warehouse space for laboratories to RQC" and 38.21 "Recovery of recyclable materials" are eligible and reported accordingly.

	Activity	Turnover	CapEx	OpEx	Description
CCM 5.9	Material recovery from non-hazardous waste	☑			Recovery of recyclable materials (scrap income under 3821).
CCM 6.2	Freight rail transport			☑	Railway track rental costs related to freight operations.
CCM 7.3	Installation, maintenance and repair of energy efficiency equipment		☑		Replacement of lighting groups, repair works for energy efficiency, building envelope works and LED upgrades.

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CCM 7.7	**Acquisition and ownership of buildings**	☑			**Income from rental of warehouse space for laboratories (RQC) and franchise fee income.**
CCA 14.1	Emergency Services			☑	Inspection and refilling of fire extinguishers as part of emergency preparedness.
WTR 4.1	Provision of IT/OT data-driven solutions for leakage reduction		☑		Automation of PSI water tank level and installation of flame sensors for pump safety.

Rom Oil S.A.

- **Rom Oil S.A.** (hereinafter referred to as RML) carries out fuel storage, handling and wholesale distribution activities, supporting the Group's logistics chain and ensuring product availability across the network. RML also operates under NACE 68.20 – "Renting and operating of own or leased real estate", however these revenues arise from intra-group transactions and are, therefore, not eligible for taxonomy reporting.

	Activity	Turnover	CapEx	OpEx	Description
CCM 7.2	Renovation of existing buildings		☑		Repairs of concrete platforms and administrative buildings to ensure safe and continuous depot operations.
CCM 7.3	Installation, maintenance and repair of energy efficiency equipment		☑		Light rehabilitation of storage tanks to maintain equipment performance and energy efficiency.
CCA 14.1	Emergency Services		☑		Replacement of emergency diesel generator and upgrades to storage facilities and firefighting systems for improved emergency response.

Decisions in determining the alignment of our activities

Within Rompetrol, **21 activities** have been identified as eligible under the taxonomy, as they meet the description of activities defined in EU Regulation 2020/852 and the related delegated regulations. However, according to the analysis carried out, for the reporting period from 01.01.2025 to 31.12.2025, no activities are aligned with the taxonomy in accordance with Article 17 of Regulation (EU) 2020/852 and the subsequent delegated acts.

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For alignment assessment to the Taxonomy Regulation, the following steps were performed for each eligible activity:

- Significant contribution assessment
- DNSH assessment
- Climate risk and vulnerability assessment study of the activities
- Minimum social safeguards assessment

No main or secondary activities of Rompetrol are aligned with the taxonomy in 2025.

CapEx Plan

Our previous CapEx plan has been updated based on new business priorities. In 2025 we have set a new plan for 2026 to 2030. This will be reflected in the next EU Taxonomy reporting exercise. The new budget for the upcoming year for the Refining & Petrochemicals business unit is detailed in the table below.

Entity	Project Category	2026	2027	2028	2029	2030	2026-2030
Petromidia Refinery	**Development**	9,186	-	-	-	-	9,186
	Non Operational	0.801	2,034	1,080	2,080	1,295	7,224
	Operational	70,310	43,938	103,088	54,808	102,867	369,944
Rompetrol Petrochemicals	**Development**	1,625	0.097	-	-	-	1,722
	Non Operational	-	0.150	-	-	-	0.150
	Operational	10,177	1,980	5,362	2,674	11,768	37,984
Vega Refinery	**Development**	5,232	-	-	-	-	5,232
	Non Operational	0.020	0.063	0.015	0.015	-	0.113
	Operational	8,512	3,876	6,153	3,456	6,465	29,773
Grand Total (x kUSD)		**105,864**	**52,139**	**115,698**	**63,032**	**122,395**	**461,328**

3. EU Taxonomy KPIs

For the 2025 reporting period, the Taxonomy-eligible and -aligned Turnover, CAPEX and OPEX disclosed for the financial year ended 31 December 2025 are presented at consolidated level for Rompetrol Rafinare S.A. and its subsidiaries. Consolidation is applied to prevent double counting of intra-group transactions and to ensure compliance with Article 8 of Regulation (EU) 2020/852 and the related Delegated Acts. The accounting policies applied in the calculation of the KPIs are described below.

Turnover KPI

The Turnover KPI reflects the proportion of net turnover generated from Taxonomy-eligible and -aligned economic activities relative to total net turnover for the reporting period. It is calculated as the net turnover derived from products and services associated with Taxonomy-eligible economic activities (numerator) divided by total net turnover (denominator), both determined for the financial year from 1 January 2025 to 31 December 2025.

The denominator of the Turnover KPI is based on net turnover as reported in the section 22, located on page 73 of the **Consolidated Financial Statements** prepared in accordance with IFRS for the financial year ended December 31, 2025, totalling **~4.4 billion USD**.

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The numerator of the Turnover KPI comprises the portion of net turnover generated from products and services that are directly associated with economic activities identified as Taxonomy-eligible, based on the descriptions set out in the EU Taxonomy Regulation and its Delegated Acts.

CapEx KPI

The CapEx KPI represents the share of Taxonomy-eligible capital expenditure in total capital expenditure for the reporting period. The KPI is calculated as taxonomy-eligible CapEx (numerator) divided by total CapEx (denominator).

The numerator of the CapEx KPI includes capital expenditures that relate to assets or processes associated with Taxonomy-eligible or Taxonomy-aligned economic activities (type A) or relate to the acquisition of output from Taxonomy-eligible/aligned activities (type C).

For the reporting period, the total consolidated CapEx amounts to **~70 million USD**, as disclosed in section 28, page 83, with the **Consolidated Financial Statements.**

OpEx KPI

The OpEx KPI represents the proportion of Taxonomy-eligible operating expenditure compared to total operating expenditure for the reporting period. The KPI is calculated as the Taxonomy-eligible OpEx (numerator) divided by the total OpEx (denominator).

The denominator, total OPEX, consists of non-capitalized direct costs relating to research and development, building renovation measures, short-term rental, maintenance and repairs and any other direct costs related to the daily maintenance of real estate assets, facilities and equipment.

Operating expenditures are derived from relevant general accounts, including 611, 612, 652 and 6024, as disclosed in the consolidated Balance Sheet at 31.12.2025. For the reporting period, the total OpEx amounted to **~83 million USD.**

The numerator includes the portion of these operating expenses that are directly linked to Taxonomy-eligible economic activities, including costs incurred to maintain assets or processes associated with such activities in accordance with the Taxonomy requirements.

The quantitative KPI tables are presented in Annex I to this report.

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Annex I

Template I: *Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025 (summary KPIs)*

Financial year 2025															
					Breakdown by environmental objectives of Taxonomy aligned activities										
KPI	**Total (USD)**	**Proportion of Taxonomy eligible activities**	**Taxonomy aligned activities**	**Proportion of Taxonomy aligned activities**	**Climate Change Mitigation**	**Climate Change Adaptation**	**Water**	**Circular Economy**	**Pollution**	**Biodiversity**	**Proportion of enabling activities**	**Proportion of transitional activities**	**Not assessed activities considered non-material**	**Taxonomy aligned activities in previous reported period - 2024**	**Taxonomy aligned activities in previous reported period - 2024**
Turnover	4,404,155,168 $	0.28%	0.00 $	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00 $	0%
CapEx	70,024,529.46 $	24.81%	0.00 $	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00 $	0%
OpEx	82,792,774.00 $	20.58%	0.00 $	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0.00 $	0%

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Template II. *Proportion of* ***Turnover*** *from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)*

Financial year 2025														
Economic Activities	**Code**	**Taxonomy eligible KPI (Proportion of Taxonomy eligible Turnover)**	**Taxonomy aligned KPI (monetary value of Turnover)**	**Taxonomy aligned KPI (Proportion of Taxonomy aligned Turnover)**	**Environmental objective of Taxonomy-aligned activities**						**Enabling activity**	**Transitional activity**	**Proportion of Taxonomy aligned in Taxonomy eligible**
					Climate Change Mitigation	**Climate Change Adaptation**	**Water**	**Circular Economy**	**Pollution**	**Biodiversity**			
Manufacture of organic basic chemicals	CCM 3.14	0.06%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Transmission and distribution of electricity	CCM 4.9	0.11%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
District heating/cooling distribution	CCM 4.15	0.01%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0.04%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Construction, extension and operation of wastewater collection and treatment	CCM 5.3	0.06%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Material recovery from non-hazardous waste	CCM 5.9	0.0003%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Acquisition and ownership of buildings	CCM 7.7	0.002%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Sum of alignment per objective					**0%**	**0%**	**0%**	**0%**	**0%**	**0%**			
Total Turnover		0.28%	0.00 $	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0.11%**	**0.06%**	**0%**

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Template II. *Proportion of* ***CapEx*** *from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)*

Financial year 2025														
Economic Activities	**Code**	**Taxonomy eligible KPI (Proportion of Taxonomy eligible CapEx)**	**Taxonomy aligned KPI (monetary value of CapEx)**	**Taxonomy aligned KPI (Proportion of Taxonomy aligned CapEx)**	**Environmental objective of Taxonomy aligned activities**						**Enabling activity**	**Transitional activity**	**Proportion of Taxonomy aligned in Taxonomy eligible**
					Climate Change Mitigation	**Climate Change Adaptation**	**Water**	**Circular Economy**	**Pollution**	**Biodiversity**			
Transmission and distribution of electricity	CCM 4.9	0.05%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system	CCM 4.31	3.15%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0.13%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Renewal of water collection, treatment and supply systems	CCM 5.2	0.36%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Renewal of wastewater collection and treatment	CCM 5.4	0.75%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.15%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Renovation of existing buildings	CCM 7.2	7.54%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%

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Financial year 2025													
Economic Activities	**Code**	**Taxonomy eligible KPI (Proportion of Taxonomy eligible CapEx)**	**Taxonomy aligned KPI (monetary value of CapEx)**	**Taxonomy aligned KPI (Proportion of Taxonomy aligned CapEx)**	**Environmental objective of Taxonomy aligned activities**						**Enabling activity**	**Transitional activity**	**Proportion of Taxonomy aligned in Taxonomy eligible**
					Climate Change Mitigation	**Climate Change Adaptation**	**Water**	**Circular Economy**	**Pollution**	**Biodiversity**			
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	3.01%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Data processing, hosting and related activities	CCM 8.1	0.47%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Data-driven solutions for GHG emissions reductions	CCM 8.2	0.11%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Emergency Services	CCA 14.1	9.06%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Provision of IT/OT data-driven solutions for leakage reduction	WTR 4.1	0.04%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Sum of alignment per objective					**0%**	**0%**	**0%**	**0%**	**0%**	**0%**			
Total CapEx		24.81%	0.00 $	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**12.27%**	**3.15%**	**0%**

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Template II. *Proportion of* ***OpEx*** *from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)*

Financial year 2025													
Economic Activities	**Code**	**Taxonomy eligible KPI (Proportion of Taxonomy-eligible OpEx)**	**Taxonomy-aligned KPI (monetary value of OpEx)**	**Taxonomy aligned KPI (Proportion of Taxonomy**	**Environmental objective of Taxonomy aligned activities**						**Enabling activity**	**Transitional activity**	**Proportion of Taxonomy aligned in Taxonomy eligible**
					Climate Change Mitigation	**Climate Change Adaptation**	**Water**	**Circular Economy**	**Pollution**	**Biodiversity**			
Manufacture of hydrogen	CCM 3.10	1.73%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Manufacture of organic basic chemicals	CCM 3.14	0.38%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Electricity generation using solar photovoltaic technology	CCM 4.1	0.05%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Transmission and distribution of electricity	CCM 4.9	1.93%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
District heating/cooling distribution	CCM 4.15	0.25%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system	CCM 4.31	1.20%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	1.47%	0.00 $	0%	0%	0%	0%	0%	0%	0%			
Construction, extension and operation of wastewater collection and treatment	CCM 5.3	1.20%	0.00 $	0%	0%	0%	0%	0%	0%	0%			
Renewal of wastewater collection and treatment	CCM 5.4	0.01%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%

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Financial year 2025														
Economic Activities	**Code**	**Taxonomy eligible KPI (Proportion of Taxonomy-eligible OpEx)**	**Taxonomy-aligned KPI (monetary value of OpEx)**	**Taxonomy aligned KPI (Proportion of Taxonomy**	**Environmental objective of Taxonomy aligned activities**						**Enabling activity**	**Transitional activity**	**Proportion of Taxonomy aligned in Taxonomy eligible**
					Climate Change Mitigation	**Climate Change Adaptation**	**Water**	**Circular Economy**	**Pollution**	**Biodiversity**			
Freight rail transport	CCM 6.2	0.02%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Renovation of existing buildings	CCM 7.2	0.03%	0.00 $	0%	0%	0%	0%	0%	0%	0%		T	0%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	11.56%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Emergency Services	CCA 14.1	0.25%	0.00 $	0%	0%	0%	0%	0%	0%	0%	E		0%
Remediation of contaminated sites and areas	PPC2.4	0.50%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Remediation of legally non-conforming landfills and abandoned or illegal waste dumps	PPC2.3	8.83%	0.00 $	0%	0%	0%	0%	0%	0%	0%			0%
Sum of alignment per objective					**0%**	**0%**	**0%**	**0%**	**0%**	**0%**			
Total OpEx		29.41%	0.00 $	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**15.33%**	**1.82%**	**0%**

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Independent auditor's limited assurance report on Rompetrol Rafinare S.A.'s Consolidated Sustainability Statement

To the Shareholders of Rompetrol Rafinare S.A.

Limited assurance conclusion

We have conducted a limited assurance engagement on the consolidated sustainability statement of Rompetrol Rafinare S.A. (the "Company"), included in Appendix 3-Consolidated Sustainability Statement to the Annual Report of the Board of Directors on the Consolidated Financial Statements (the "Consolidated Sustainability Statement"), as at 31 December 2025 and for the year then ended.

The Company's registered office is in 215 Navodari Boulevard, Administrative Pavilion, 907500, Navodari, Romania and its unique fiscal registration code is 1860712.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Statement is not prepared, in all material respects, in accordance with the provisions of section 7^1.3 of the Order of Minister of Public Finance No. 2844/2016 for approval of accounting regulations in accordance with International Financial Reporting Standards, with subsequent amendments ("OMPF 2844/2016") implementing Article 29(a) of EU Directive 2013/34/EU, including:

- compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Company to identify the information reported in the Consolidated Sustainability Statement (the "Process") is in accordance with the description set out in note 1.5.1 - Description of the processes to identify and assess material impacts, risks and opportunities; and

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- compliance of the disclosures in Appendix 1 - EU Taxonomy Disclosures according to Article 8 of Regulation (EU) 2020/852 to the Consolidated Sustainability Statement with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

Basis for conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information ("ISAE 3000 (Revised)"), issued by the International Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Auditor's responsibilities section of our report.

Our independence and quality management

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour and of the requirements relevant in Romania, including Law 162/2017 regarding statutory audit of annual financial statements and annual consolidated financial statements and regarding changes to other regulations and subsequent amendments ("Law 162/2017").

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Other matter

The comparative consolidated sustainability information of the Company as at 31 December 2024 and for the year then ended was assured by another audit firm, whose assurance report dated 29 March 2025, expressed an unmodified conclusion. Our conclusion is not modified in respect of this matter.

Responsibilities for the Consolidated Sustainability Statement

The Board of Directors of the Company are responsible for designing and implementing a process to identify the information reported in the Consolidated Sustainability Statement in accordance with the ESRS and for disclosing this Process in note 1.5.1 - Description of the processes to identify and assess

material impacts, risks and opportunities of the Consolidated Sustainability Statement. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

The Board of Directors of the Company are further responsible for the preparation of the Consolidated Sustainability Statement, in accordance with the provisions of section 7^1.3 of OMPF 2844/2016 implementing Article 29(a)of EU Directive 2013/34/EU, including:

- compliance with the ESRS;
- preparing the disclosures in Appendix 1- EU Taxonomy Disclosures according to Article 8 of Regulation (EU) 2020/852 to the Consolidated Sustainability Statement, in compliance with Article 8 of the Taxonomy Regulation;
- designing, implementing and maintaining such internal control that the Board of Directors of the Company determine is necessary to enable the preparation of the consolidated sustainability statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

Inherent limitations in preparing the Consolidated Sustainability Statement

In reporting forward-looking information in accordance with ESRS, the Board of Directors of the Company are required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected.

Greenhouse gas emissions quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

Auditor's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the consolidated sustainability statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Considering whether the information identified addresses the applicable disclosure requirements of the ESRS; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Company's description of its Process set out in note 1.5.1 - Description of the processes to identify and assess material impacts, risks and opportunities.

Our other responsibilities in respect of the Consolidated Sustainability Statement include:

- Identifying where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures responsive to where material misstatements are likely to arise in the Consolidated Sustainability Statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the Consolidated Sustainability Statement. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise in the Consolidated Sustainability Statement, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
    - performing inquiries to understand the sources of the information used by the Board of Directors of the Company (e.g., stakeholder engagement, business plans and strategy documents); and
    - reviewing the Company internal documentation of its Process.
- Evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Company was consistent with the description of the Process set out in note 1.5.1 - Description of the processes to identify and assess material impacts, risks and opportunities.

In conducting our limited assurance engagement, with respect to the Consolidated Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Consolidated Sustainability Statement by obtaining an understanding of the Group's control environment, processes and information system relevant to the preparation of the Consolidated Sustainability Statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- Evaluated whether the information identified by the Process is included in the Consolidated Sustainability Statement;
- Evaluated whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS;
- Performed inquires of relevant personnel and analytical procedures on selected information in the Consolidated Sustainability Statement;
- Performed substantive assurance procedures on selected information in the Consolidated Sustainability Statement;
- Where applicable, compared disclosures in the Consolidated Sustainability Statement with the corresponding disclosures in the consolidated financial statements and Annual Report of the Board of Directors on the Consolidated Financial Statements ;
- Evaluated the methods, assumptions and data used by the Company for developing estimates and forward-looking information;
- Obtained an understanding of the Company's process to identify taxonomy-eligible and taxonomy-

aligned economic activities and the corresponding disclosures in the Consolidated Sustainability Statement.

On behalf of
PricewaterhouseCoopers Audit SRL
Audit firm
registered with the Public Electronic Register of financial auditors and audit firms under no. FA6

Refer to the original signed Romanian version

Kenneth Spiteri
Financial auditor
registered with the Public Electronic Register of financial auditors and audit firms under no. AF417

Bucharest, 27 March 2026