

**Statement of Carpathia Pensii S.A.F.P.P. S.A.
Supervisory Board regarding the conclusions
of the evaluation on risk management
system efficiency**

The Supervisory Board is responsible for the issuance of the risk management policy and risk profile of the company and of the private pensions funds.

The risk and internal control procedures are properly communicated within the company. Risk management for the Supervisory Board is an ongoing process and is focused on the evaluation, management and monitoring the significant risks identify within company's activity. The Supervisory Board is periodically informed about the significant risks identified, and about their evolution. The review of significant risks, risk management and internal control activities is performed annually. A structured risk management process has been implemented to ensure the consolidation of the portfolio of the pension funds managed for the benefit of our clients, for the efficiency of the processes carried out in the company, as well as for the development of human capital, in order to increase the operational and financial excellence.

The risks identified within the company are analyzed monthly, quarterly or semi-annually, a particular category being the investment risks that appear in the course of the asset management activity for managed pension funds. In order to minimize the risks within the company's activity, the ones related to the important processes were identified, evaluated and monitored and the application of the controls related to them was followed.

Existing controls consist in the implementation of working procedures and instructions, which include elements

**Declaratia Consiliului de Administratie al
Carpathia Pensii S.A.F.P.P. S.A. privind
concluziile evaluarii eficientei sistemului de
administrare riscurilor**

Consiliul de Supraveghere este responsabil pentru elaborarea politicii de administrare a riscurilor si a profilului de risc al societatii si a fondurilor de pensii private.

Procedurile de risc si control intern sunt comunicate adecvat in cadrul societatii. Gestionarea riscurilor in Consiliul de Supraveghere este un proces continuu si este axat pe evaluarea, gestionarea si monitorizarea riscurilor semnificative din activitatea societatii. Consiliul de Supraveghere este informat periodic despre riscurile semnificative identificate in cadrul societatii si despre evolutia acestora. Revizuirea riscurilor semnificative, precum si a activitatilor de administrare a riscurilor si de control intern se efectueaza anual. Un proces structurat de gestionare a riscurilor a fost implementat pentru a asigura consolidarea portofoliilor fondurilor de pensii administrate in beneficiul clientilor nostri, pentru eficientizarea proceselor derulate in societate, precum si pentru dezvoltarea capitalului uman, in vederea cresterii excelentei operationale si financiare.

Sunt analizate cu frecventa lunara, trimestriala si semestriala riscurile identificate in societate, o categorie aparte fiind reprezentata de riscurile investitionale care apar in cadrul derularii activitatii fondurilor de pensii administrate. Pentru minimizarea riscurilor din cadrul activitatii societatii s-au identificat, evaluat si monitorizat riscurile aferente proceselor importante si s-a urmarit aplicarea controalelor aferente acestora.

Controalele existente constau in implementarea de proceduri si instructiuni de lucru, care cuprind elemente



regarding: reporting lines, separation of employee's duties, establishing the approval frameworks for transactions, financial reporting and monitoring of process indicators, which provide information on the evolution of the activity over time. The investment risks that are identified in the activity of trading, evaluating and asset management are analyzed by both Investments Direction and the Risk Department through procedures that ensure the separation of the two activities and increasing the efficiency of the controls implemented. The internal procedures implemented ensure efficient and timely management of any conflict of interest situations that may arise during the course of the activity.

The procedures related to business continuity are reviewed half-yearly, and the tests have shown the efficiency of these procedures. In the current situation, the business continuity plan does not include anymore compulsory work scenarios linked to the pandemic situation, as a consequence of its termination. The hybrid work scenarios were successfully implemented, their application ensuring the security and safety of the company's employees.

In the first semester of 2025, the internal procedural framework was revised, in the sense of separating the risk management policy and procedure, as a result of updates related to the company's governance system and harmonization with some incident provisions of the VIG group, clarification of a definition of an indicator used in calculating the liquidity risk of managed funds, updating the work instruction regarding the methodology for identifying, evaluating and monitoring risks, as a result of the modification of the company's governance system and harmonization with some incident provisions of the VIG group, mainly adapting the Operational Risk Register and the control measures established to the VIG group model, reviewing other internal regulations as a result of the modification of the company's governance system.

privind: linii de raportare, separarea responsabilitatilor angajatilor, stabilirea cadrelor de aprobare a tranzactiilor efectuate, raportari financiare si monitorizarea indicatorilor de procese, care ofera informatii despre evolutia in timp a activitatii societatii. Riscurile investitionale care se identifica in activitatea de tranzactionare, evaluare si gestionare a activelor din portofoliile de fonduri administrate sunt analizate atat de Directia Investitii, cat si de Departamentul Risc prin proceduri care asigura separarea celor doua activitati, crescand eficienta controalelor implementate. Procedurile interne implementate asigura gestionarea eficienta si in timp a oricaror situatii de conflict de interese care pot aparea in cursul desfasurarii activitatii.

Sunt revizuite cu periodicitate semestriala procedurile referitoare la continuarea activitatii societatii, si desfasurarea testelor de continuitate a activitatii a demonstrat eficienta acestor proceduri. In contextul actual, planul de continuare a afacerii nu mai cuprinde scenarii obligatorii legate de situatia pandemica, ca urmare a incetarii acesteia. Scenariile de munca hibrid au fost aplicate cu succes, asigurand securitatea si siguranta angajatilor societatii.

In semestrul I 2025 a avut loc revizuirea cadrului procedural intern, in sensul separarii politicii si procedurii de administrare a riscurilor, ca urmare a actualizarilor legate de sistemul de guvernanta al companiei si de armonizarea cu unele prevederi incidente ale grupului VIG, clarificarii unei definitii a unui indicator utilizat in calculul riscului de lichiditate al fondurilor administrate, actualizarea instructiunii de lucru privind metodologia de identificare, evaluare si monitorizare a riscurilor, ca urmare a modificarii sistemului de guvernanta al companiei si de armonizarea cu unele prevederi incidente ale grupului VIG, in principal adaptarea Registrului riscurilor operationale si a masurilor de control instituite la modelul grupului VIG, revizuirea altor reglementari interne ca urmare a modificarii sistemului de guvernanta al companiei.



The internal training on anti-bribery and corruption (ABC) related risks, carried out online by The Risk Department, which was properly assessed by all Company's staff, was completed in HY2 2024, as well as at the moment of onboarding for the new staff.

The monitoring of the control measures put in place in relation with the operational risks (mainly IT) was carried on, both at the company level, and at the managed pension funds level. During HY1 2025, no risk events were identified that would lead to the appearance of new risks or to the modification of the risks identified at the level of the company and of the managed pension funds, or to lead to the implementation of additional controls. In the mentioned processes, only low and medium value risks were identified, and the risk profile remained unchanged, namely medium.

In the internal control missions, carried out during the same period, no deficiencies were identified that would lead to the identification of new risks.

Considering that, all identified risks have values that fall within the risk tolerance established at the company level and no new risk mitigation controls have been implemented, it is concluded that the risk management activity has been carried out effectively.

Dated July, 31st 2025

Trainingul intern privind conștientizarea riscului de mită și corupție, s-a desfășurat online de către Departamentul Risc, și a fost însușit de către angajații Societății, în cursul semestrului II 2024, precum și la momentul angajării în Societate în cazul personalului nou-venit.

S-a continuat monitorizarea măsurilor de control aferente riscurilor operationale (în principal IT) la nivelul societății și a fondurilor de pensii administrate. În cursul semestrului I 2025 nu au fost identificate evenimente de risc care să conducă la apariția de riscuri noi sau la modificarea riscurilor identificate la nivelul societății și a fondurilor de pensii administrate, sau să ducă la implementarea de controale suplimentare. În procesele menționate, au fost identificate doar riscuri de valoare mică și medie, iar profilul de risc a rămas neschimbat, adică mediu.

În activitatea de control intern, derulată în aceeași perioadă, în cadrul misiunilor de control intern nu au fost identificate deficiențe care să conducă la identificarea de riscuri noi.

Ținându-se cont de faptul că toate riscurile identificate au valori care se încadrează în toleranța de risc stabilită la nivelul societății și nu s-au implementat controale noi de mitigare a riscurilor, se concluzionează că activitatea de management a riscurilor s-a desfășurat în mod eficient.

Data: 31.07.2025