

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) AND SPONSORSHIP POLICY**

### **1. Purpose of the policy**

- 1.1. The purpose of this policy is to establish a formal, structured, and documented framework to guide Fondul Proprietatea S.A. (the “**Fund**”) in undertaking and supporting Corporate Social Responsibility (“**CSR**”) and sponsorship activities, in accordance with 2025 Bucharest Stock Exchange Corporate Governance Code and other applicable legal and regulatory requirements.
- 1.2. This policy aims to ensure that the Fund’s CSR and sponsorship activities are aligned with its mission, values, and long-term strategic objectives, contribute to the well-being of communities, and promote sustainable development while maintaining transparency, accountability, and prudent use of resources.
- 1.3. This policy shall be interpreted in conjunction with the Constitutive Act of the Fund, the Management Agreement between the Fund and the sole director and alternative investment fund manager (“**AIFM**”), and any other applicable internal rules, policies, and procedures.

### **2. Scope and definitions**

- 2.1. This policy applies to all CSR and sponsorship initiatives undertaken by the Fund, whether financial, in-kind, or otherwise, and to all interactions with beneficiaries, partners, and stakeholders in this context.
- 2.2. For the purposes of this policy:
  - (a) **Corporate Social Responsibility (CSR)** means the voluntary integration of social, environmental, ethical, and governance considerations into the Fund’s operations and stakeholder interactions;
  - (b) **Sponsorship** means the support provided by the Fund for cultural, educational, scientific, social, environmental, or other initiatives, in exchange for recognition or association with the supported event or entity. The sponsorships made by the Fund are financed by reallocating the amounts owed to the Romanian State budget as taxes, which are redirected to qualified charitable organisations, registered under the Romanian law. The tax liability of the Fund exists regardless of whether the payments are made to the State budget or to charitable organisations, which is why the sponsorships do not involve any additional cost to the Fund.

### **3. Governance and responsibilities**

- 3.1. The AIFM is responsible for operationalizing this policy, including the identification, selection, and execution of CSR and Sponsorship activities, if any, in accordance with the

approved budget and strategic priorities, and for ensuring adherence to applicable legal and regulatory requirements.

3.2. After the approval by the AIFM, the AIFM presents, for information, CSR and Sponsorship activities to the Board of Nominees, including information regarding the allocation of resources, eligibility and evaluation criteria.

#### **4. CSR and sponsorship principles**

4.1. CSR and sponsorship activities shall:

- (a) align with the Fund's mission, values, and strategic objectives;
- (b) promote positive impact in areas such as education, environmental protection, health, culture, community development;
- (c) comply with applicable laws, regulations, and internal policies;
- (d) ensure fairness and transparency, and non-discrimination in the selection of beneficiaries on the basis of colour, religion, sex, sexual orientation, national origin, ethnicity, age, race, disability, political affiliation;
- (e) avoid any conflict of interest or reputational risk for the Fund.

4.2. CSR initiatives will prioritize projects that demonstrate measurable benefits for society and align with the Fund's commitment to sustainable and responsible investment practices.

4.3. Sponsorship activities will be evaluated based on their alignment with CSR focus areas, the capacity of the beneficiary to deliver the initiative effectively, the potential for reputational enhancement consistent with the Fund's values, and the availability of measurable performance indicators.

4.4. The Fund will not provide CSR or Sponsorship support to activities that create a conflict of interest, or initiatives that contravene laws, public morals, or human rights.

#### **5. Implementation and approval process**

5.1. Proposals for CSR and Sponsorship activities may be initiated by the AIFM or members of the Board of Nominees.

5.2. Each proposal shall include:

- (a) description of the initiative and objectives;
- (b) alignment with the Fund's CSR and sponsorship principles;
- (c) budget/funding source;
- (d) expected outcomes and impact;
- (e) risk analysis and mitigation measures.

- 5.3. The AIFM will review and validate proposals, ensuring compliance with this policy and the other internal policies and procedures of the Fund.
- 5.4. Approved initiatives will be formalized through written agreements specifying obligations, deliverables, timelines, and reporting requirements.
- 5.5. The AIFM will monitor the implementation of each initiative to ensure compliance with contractual obligations and evaluate impact against agreed metrics.

## **6. Review and Amendments**

- 6.1. This procedure is reviewed at least every four years or sooner if changes occur in applicable legislation, corporate governance codes, or the Fund's operational circumstances.
- 6.2. Amendments to this procedure require approval by the AIFM and must comply with the Constitutive Act and governance rules.